

**The Global Alliance Against Industrial Aquaculture, 29 December 2015**

**[Closing the Net On 'Seal-Friendly' Scottish Salmon](#)  
[- Last orders on the RSPCA's abuse of 'last resort' killing of seals?](#)**

Faced with a barrage of negative public disclosures on seal shootings, the Scottish salmon farming industry has finally bitten the bullet and installed anti-predator nets. Exclusive figures obtained via Freedom of Information from the Scottish Government, reveals that the use of anti-predator nets on salmon farms leapt from 13% in 2011 to 79% in 2014 [1]. At the same time the number of seals killed on salmon farms fell from 241 to 80 [2].

Read more in today's Herald newspaper: "[RSPCA defend record as anti-seal cull campaigners allege salmon farms are not 'last resort' killers](#)"

"This could be the final nail in the coffin of 'seal-unfriendly' Scottish salmon," said Don Staniford, Director of the [Global Alliance Against Industrial Aquaculture](#). "The leap in the use of anti-predator nets shows the power of Freedom of Information and public disclosure. The naming and shaming of companies killing seals has forced the industry to buy nets instead of bullets. These figures blow out of the water the industry's claim that seals are shot as a 'last resort'. Even now, one in five salmon farms are still not using anti-predator nets and the use of seal blinds has fallen to less than 18%. Seal-friendly Scottish salmon is within easy reach - it just requires trigger-happy salmon farmers to stop reaching for their guns first! This New year we're calling last orders on the Scottish salmon farming industry's abuse of the definition of 'last resort' and the senseless slaughter of seals."

Shamefully, the [RSPCA](#) as well as other certification bodies such as the Soil Association and the Aquaculture Stewardship Council sanction the killing of seals as a 'last resort' [3]. The RSPCA brands over 70% of Scottish farmed salmon as 'welfare friendly' via the [RSPCA Assured](#) (formerly Freedom Food) scheme (read more via "[RSPCA Assured seal killers!](#)").



"The RSPCA, who certify over 70% of Scottish farmed salmon as 'welfare friendly', must now tighten the net on salmon farms who shoot seals first rather than as a 'last resort'," continued Staniford. "Bullets are clearly cheaper than anti-predator nets but companies such as Grieg have shown that seal-friendly salmon is attainable quickly and painlessly. Shamefully, Marine Harvest, Scottish Seafarms and the Scottish Salmon Company are still killing seals across Scotland during 2015 and must surely be expelled from the [RSPCA Assured](#) scheme. Until all salmon farms install anti-predator nets and seal blinds consumers should boycott all Scottish salmon."

In November, GAAIA wrote to the Minister for Environment, Climate Change and Land Reform (Dr. Aileen McLeod) and Cabinet Secretary for Rural Affairs, Food and Environment (Richard Lochhead) asking for clarification on the definition of 'last resort'. "How can the shooting of seals be deemed 'last resort' when all other options have not been tried first?" asked GAAIA [4].

In December, GAAIA wrote to Her Majesty the Queen (in her capacity as Royal Patron of the RSPCA), asking her to personally intervene to stop the slaughter of seals at salmon farms across Scotland (read letter [online here](#)).



"For around £1 million the [RSPCA](#) has sold their soul to the devil in the shape of the predominantly Norwegian-owned 'Scottish' salmon farming industry," concluded Staniford. "To rank the welfare of foreign-owned and factory farmed Atlantic salmon above wild Scottish seals is ethically and morally bankrupt. The RSPCA's certification of 'Scottish' salmon as welfare-friendly represents an abrogation of the RSPCA's guiding principles and founding values. If the RSPCA had any conscience at all about Atlantic salmon then they would not certify the factory farming of a migratory species. Cramping Atlantic salmon in cages is akin to farming Golden eagles in battery cages like intensively farmed chickens."

Watch a video report shot outside the RSPCA's head office earlier this month - [online here](#)



RSPCA has blood on their hands for killing seals in Scotland

Read more via:

- [Dear RSPCA, please wash the blood of Scottish seals off your hands!](#)
- [Video Message to the RSPCA - stop the killing of seals on salmon farms!](#)
- [Photos: RSPCA Assured Seal Killers!](#)
- ["Anti-salmon farm campaigners petition Queen over RSPCA's seal-shooting sanction"](#)
- [Petition to the RSPCA: End your support for the killing of Scottish seals!](#)
- [Press Release: "RSPCA Savaged Over Seal Killing in Scotland"](#)
- [Letter to Her Majesty the Queen](#)
- [RSPCA Assured Seal Killers!](#)
- [RSPCA upsets people by saying seal shooting is OK](#)
- [RSPCA attacked for its policy on seal shooting](#)
- [RSPCA: Seals should be shot as an 'absolute last resort' to protect salmon](#)

An [exclusive analysis](#) by GAAIA of all the data made available by the Scottish Government (i.e. for the [first two quarters of 2015](#), [2014](#), [2013](#), [2012](#) and [2011](#)) reveals that nearly 700 seals have been killed by salmon farmers since 2011 when [official Scottish Government statistics](#) were first collected. Scottish Seafarms (who exclusively supply Marks & Spencer) are Scotland's worst serial killers with 150 dead seals followed by Grieg Seafood Hjalmland

(136 seals killed), the Scottish Salmon Company (128 seals killed) and Marine Harvest (76 seals killed).

Read more via:

- [Supermarkets: Stop Killing Seals at Salmon Farms!](#)
- [Scottish Salmon Blinded by Seal Killing](#)
- [Salmon farmers are shooting seals instead of installing non-lethal deterrents, campaigners say](#)
- [Seal killing slips through the net](#)
- [RSPCA Assured Seal Killers!](#)
- [M&S Caught in Cross-Fire Over Seal-Killing on Scottish Salmon Farms](#)
- [Stop shooting seals for salmon meals - protest outside M&S in Edinburgh](#)
- [Shetland Times: "Steps taken to reduce number of seals killed"](#)
- [Stop shooting seals for salmon meals!](#)
- [Did a seal die for your salmon meal?](#)
- [Cecil the Seal Killers Named & Shamed in Scotland - Call for Boycott of "Seal Unfriendly" Scottish Salmon](#)

**Contact:**

Don Staniford (07771 541826 and [dstaniford@gaaia.org](mailto:dstaniford@gaaia.org))

Download High Res images via:

["Did a seal die for your salmon meal?"](#)  
["Farmed salmon: sealed with a kiss of death"](#)  
["Stop shooting seals for salmon meals"](#)  
["M&S: Seal Killers"](#)  
["Scottish Seal Killers"](#)  
["The Scottish Seal Killers"](#)  
["RSPCA Assured Seal Killers"](#)  
["RSPCA as the Royal Seal Culling Association"](#)  
["Salmon farming kills seals"](#)  
["Salmon farming: licensed to kill"](#)  
["Salmon farming is the smoking gun"](#)

**Notes to Editors:**

[1] FOI reply from the Scottish Government:

From: [Ian.Walker@gov.scot](mailto:Ian.Walker@gov.scot) [<mailto:Ian.Walker@gov.scot>]

Sent: 17 December 2015 14:42

To: [salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)

Subject: FoI/15/01975 - Request for Information on the use of anti-predator nets and seal blinds on salmon farms

Dear Mr Staniford,

Thank you for your request dated 20 November 2015 under the Freedom of Information (Scotland) Act 2002 (FOISA).

### Your request

You asked for “information relating to the use of anti-predator nets and seal blinds on salmon farms”.

As the information you have requested is ‘environmental information’ for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are applying the exemption at section 39(2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA.

This exemption is subject to the ‘public interest test’. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

### Response to your request

In respect of your request for clarification of the information quoted in letters, the data comes from the published report of the 2011/12 Survey.

This showed that 20% of fish farms had anti-predator nets and 33% of fish farms had seal blinds.

In the former case 13% of the anti-predator nets were deployed all the time and 7% of them were held in storage for deployment in case of seal incidents, making 20% in total.

In subsequent years, there is no published data on anti-predator nets or seal blinds. We have access, however, to provisional unpublished data as follows:-

2012/13

62% anti-predator nets at fish farms

29% seal blinds at fish farms

2013/14

71% anti-predator nets at fish farms

25% seal blinds at fish farms

2014/15

79% anti-predator nets at fish farms

18% seal blinds at fish farms

The questions asked requested whether anti-predator nets or seal blinds had been employed at the site continuously during the last 12 months.

We hope to publish a report on the latest incomplete survey for 2015/16 in due course.

No advice was submitted to Scottish Ministers in respect of anti-predator nets or seal blinds during 2015.

#### Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to Linda Rosborough, Area 1B South, Victoria Quay, The Shore, Edinburgh, EH6 6QQ, or through Director of Marine Scotland Mailbox [Director.ofMarineScotland@gov.scot](mailto:Director.ofMarineScotland@gov.scot). Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your rights is available on the Commissioner's website at: [www.itspublicknowledge.info](http://www.itspublicknowledge.info).

Best wishes

Ian Walker

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Marine Planning & Policy  
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[2] From the Scottish Government's web-pages on '[Seal Licensing](#)':

2011:

"A total of only 241 seals were shot across 235 individual fish farms":

<http://www.gov.scot/Topics/marine/Licensing/SealLicensing/2011/2011>

2012:

"Only 208 seals have been shot across 230 individual fish farms"

<http://www.gov.scot/Topics/marine/Licensing/SealLicensing/2011/2012>

2013:

"Only 105 seals have been shot across 216 individual fish farms":

<http://www.gov.scot/Topics/marine/Licensing/SealLicensing/2011/2013>

2014:

"Only 80 seals have been shot across 214 individual fish farms":

<http://www.gov.scot/Topics/marine/Licensing/SealLicensing/2011/2014>

[3] Here's the section of the [RSPCA's welfare standards for farmed Atlantic salmon](#) (September 2015) sanctioning the killing of seals:

**HP 7.14** The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer that all of the procedures leading up to the point of last resort have been mobilised.

**i** The repeated shooting of seals without having deployed all of the measures leading to a last resort scenario, will result in the site being suspended from the scheme pending further investigation.

- HP 7.15** There must be positive identification that a seal is causing the problem of fish mortality, or is the cause of compromised fish welfare.
- HP 7.16 \*** The humane dispatch of any seal must only be undertaken as a last resort in order to protect the welfare of the fish and where all non-lethal methods have failed to do so.
- HP 7.17 \*** Before the humane culling of seals as a last resort can be considered, the following must have been implemented:
- a) nets are adequately tensioned
  - b) top nets secured to deny ingress by predators into the enclosure
  - c) dead fish have been regularly removed
  - d) where appropriate, ADDs/ASDs have been mobilised and are working properly
  - e) predator nets/curtains/screens have been deployed where it is appropriate to do so.
- HP 7.18 \*** The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer, that all of the steps leading up to a last resort scenario have been implemented.
- HP 7.19 \*** Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept:
- a) names of all persons with valid firearms certificates who are deemed competent to perform the task
  - b) details of any bullets used and returned in the ammunition register
  - c) details of any animal that has been shot, including:
    - i) the species
    - ii) the time and date of dispatch
    - iii) the location
    - iv) the reason for the shooting
    - v) the number of fish killed before resorting to a lethal method
    - vi) the number of fish on site.

- HP 7.19.1\*** In the case of members of the Freedom Food scheme, all the details in HP 7.19 relating to seal shootings must be reported to the Freedom Food office, within 72 hours.
- HP 7.20** All attempts must be made to recover the body of the animal that has been shot and it must be recorded as to whether or not the body was recovered.
- HP 7.21** Any carcasses must be disposed of in accordance with the law.
- HP 7.22** Seals must not be shot outside the Crown Estate lease area.
- HP 7.23** After every shooting incident, a review of all predator exclusion procedures must be undertaken and records kept of such reviews.

In June 2015, the RSPCA made "[key changes](#)" but maintained their shoot-to-kill policy on seals:

June 2015

### Key<sup>1</sup> changes to the RSPCA welfare standards for farmed Atlantic salmon

As part of the on-going process of reviewing the welfare standards, they have now been amended and updated, and include the addition of new standards and guidance. All the amendments to the current version of the [RSPCA welfare standards for farmed Atlantic salmon](#), dated October 2012, were sent to Freedom Food members on 9<sup>th</sup> June 2015 and these changes will come into force on 9<sup>th</sup> September 2015, unless otherwise stated by a standard. This document provides further information on the rationale underpinning the decision/s for making key amendments to the standards.

Husbandry Practices		
Current standard	New/Amended standard	Reason for change and further information
	<b>New standard HP 7.16</b> The humane dispatch of any seal must only be undertaken as a last resort in order to protect the welfare of the fish and where all non-lethal methods have failed to do so.	It was felt to be necessary to make the previous information box into a standard, so that the last resort scenario is explicit within the main body of the document.
	<b>New standard HP 7.17</b> Before the humane culling of seals as a last resort can be considered, the following must have been implemented: a) nets are adequately tensioned b) top nets secured to deny ingress by predators into the enclosure c) dead fish have been regularly removed d) where appropriate, ADDs/ASDs have been mobilised and are working properly e) predator nets/curtains/screens have been deployed where it is appropriate to do so.	This has now been elevated into a standard, from its previous status as an information box. This defines the last resort scenario, so that there can be no doubt as to what it means.
	<b>New standard HP 7.18</b> The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer, that all of the steps leading up to a last resort scenario have been implemented.	This will provide verification that all of the steps have been taken.

<p><b>Current standard HP 6.16</b> Where it becomes necessary to humanely dispatch a seal, the following records must be kept:</p> <p>a) names of all persons with valid firearms certificates who are deemed competent to perform the task</p> <p>b) details of any bullets used and returned in the ammunition register</p> <p>c) details of any animal that has been shot, including:</p> <ul style="list-style-type: none"> <li>• the species</li> <li>• the time and date of dispatch</li> <li>• the location</li> <li>• the reason for the shooting.</li> </ul>	<p><b>Amended standard HP 7.19</b> Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept:</p> <p>a) names of all persons with valid firearms certificates who are deemed competent to perform the task</p> <p>b) details of any bullets used and returned in the ammunition register</p> <p>c) details of any animal that has been shot, including:</p> <ul style="list-style-type: none"> <li>i) the species</li> <li>ii) the time and date of dispatch</li> <li>iii) the location</li> <li>iv) the reason for the shooting</li> <li>v) the number of fish killed before resorting to a lethal method</li> <li>vi) the number of fish on site.</li> </ul>	<p>The fish are never mentioned in many of the reports which appear about seal shooting. The addition of including the number of fish involved in seal attacks helps to provide important information regarding the facts surrounding this issue.</p>
	<p><b>New Standard HP 7.19.1</b> In the case of members of the Freedom Food scheme, all the details in HP 7.19 relating to seal shootings must be reported to the Freedom Food office, within 72 hours.</p>	<p>This used to be a voluntary requirement. It is now mandatory and will help to ensure that information relating to this important issue is provided to the scheme in a consistent and timely manner.</p>

Download as a PDF [online here](#)

Read more via:

["RSPCA Assured Seal Killers!"](#)

["RSPCA upsets people by saying seal shooting is OK"](#)

["RSPCA attacked for its policy on seal shooting"](#)

["RSPCA: End your support for the killing of Scottish seals"](#)

["Letter to the RSPCA: Public Pledge to Stop Certifying Seal-Killing Salmon Farms"](#)

["Mass seal slaughter as RSPCA opts to protect fish farms"](#)

["RSPCA Freedom Food fish farmers killing seals"](#)

The Aquaculture Stewardship Council also sanction the killing the seals at salmon farms. The [ASC farmed salmon standards \(June 2012\)](#) actually specifies the number of "lethal incidents" permitted - with as many as eight animals including two marine mammals such as seals or sea lions allowed to be killed over a prior two year period!

Criterion 2.5 Interaction with wildlife, including predators<sup>27</sup>

INDICATOR	STANDARD
2.5.6 Maximum number of lethal incidents <sup>35</sup> on the farm over the prior two years	< 9 lethal incidents, <sup>36</sup> with no more than two of the incidents being marine

<sup>35</sup> Lethal incident: Includes all lethal actions as well as entanglements or other accidental mortalities of non-salmonids.

<sup>36</sup> Standard 2.5.6 applicable to incidents related to non-endangered and non-red-listed species. This standard complements, and does not contradict, 2.5.3.

*Final Salmon Aquaculture Dialogue Standards for the Aquaculture Stewardship Council, June 13, 2012*

Read more via:

["The Abominable Salmon Council"](#)

["WWF Greenwashes Marine Harvest"](#).

["Killer Panda"](#)

Here's the Soil Association's policy supporting the killing of seals:

3 September 2015

Don Staniford  
Director of the Global Alliance Against Industrial Aquaculture



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Bristol, BS1 3NX

T 0117 314 5000  
www.soilassociation.org

Twitter @SoilAssociation  
Facebook facebook.com/soilassociation

Dear Mr Staniford,

Thank you for your letters dated 30 August 2015 to our offices in Bristol and Edinburgh.

Companies licensed under Soil Association organic standards are only permitted to cull seals as an absolute last resort after every possible deterrent has been explored and it is only permitted under licenses issued and controlled by the Scottish Government.

Our records show that in the past 3 years, one seal has been culled on a Scottish organic fish farm currently licensed with Soil Association Certification. This action was an absolute last resort at the time and was permitted under licenses issued and controlled by the Scottish Government.

Read more via:

["Letter to the Soil Association: public pledge to stop certifying seal-killing salmon farms"](#)

["Organic Scamon: the greenwashing of toxic farmed salmon"](#)

["Why organic salmon is causing a nasty smell"](#)

[4] Email from GAAIA to the Scottish Government:

**From:** Don Staniford [mailto:salmonfarmingkills@gmail.com]

**Sent:** 29 November 2015 08:36

**To:** 'Richard.Lochhead.msp@scottish.parliament.uk'; 'scottish.ministers@gov.scot'; 'Aileen.McLeod.msp@scottish.parliament.uk'

**Cc:** 'alison.johnstone.msp@scottish.parliament.uk'; 'Roderick.Campbell.msp@scottish.parliament.uk'; 'Carey.Cunningham@gov.scot'; 'Stephen.Bruce@gov.scot'; 'Oana.Racu@gov.scot'; 'Ian.Walker@gov.scot'

**Subject:** Seal killing at salmon farms - "last resort"?

Further to today's Sunday Times article (enclosed below), what steps are the Scottish Government taking to increase the use of anti-predator nets and seal blinds on salmon farms?

Please note that a letter from Richard Lochhead, Cabinet Secretary for Rural Affairs, Food & the Environment (22 October 2015) to Roderick Campbell MSP (following a query directed at Dr Aileen McLeod) included the statement that "a third (of fish farms) use seal blinds and a fifth use anti-predator nets":

As Dr McLeod mentioned during the debate, all fish farms included in applications for a seal licence already employ at least one and many a range of non-lethal alternatives. All use tensioned nets, almost half use Acoustic Deterrent Devices (ADDs), a third use seal blinds and a fifth use anti-predator nets.

Read the letter in full [online here](#) (p1) and [online here](#) (p2)

If 80% of the salmon farming industry do NOT use anti-predator nets and 67% do NOT use seal blinds then how can the industry and the Scottish Government claim that seals are shot as a "last resort"?

For example, a report - "[The use of Anti-Predator Controls at Scottish Marine Salmon Farms](#)" - published in 2002 by Fisheries Research Services indicated that less than 10 salmon farms used seal blinds (but that nearly 100 salmon farms used "shooting"):

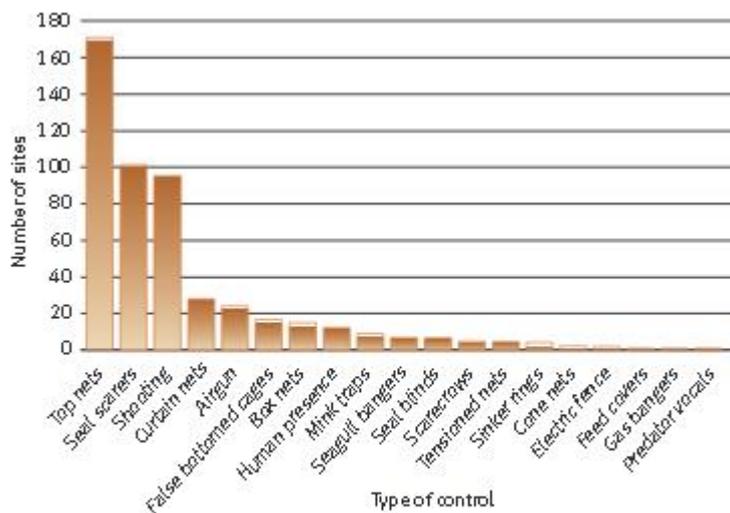


Figure 2: The number of sites at which each of the 19 predator control methods was used.

Do you have same data as above for 2015?

It seems painfully clear (to seals at least) that salmon farmers across Scotland are reaching first for the gun and not exhausting the other 18 predator control options listed in the above graph.

The definition of "last resort" seems to have been corrupted.

For example, the [Cambridge English Dictionary](#) defines "last resort" as "if all other methods fail".

Since (in 2002 at least) there were 19 predator control methods then how can shooting be defined as a "last resort" when other methods such as seal blinds and anti-predator nets are not being universally used?

