

Mr Don Staniford  
Director  
Global Alliance Against Industrial Aquaculture



Your ref:  
Our ref: 2015/0041448

31 December 2015

Dear Mr Staniford

Thank you for your e-mail of 29 November to Dr Aileen McLeod, Minister for the Environment, Climate Change and Land Reform, concerning seals. I have been asked to reply.

Scotland has more seals than the rest of the European Union – 100,000 grey seals and a minimum of 20,700 common seals. The story of seal management in Scotland therefore represents a significant example of conservation success and provides the basis for much wildlife tourism around our coasts. Such large numbers of seals inevitably mean that there are some local conflicts between individual seals and fisheries or fish farms, which are equally important to our coastal communities.

If a fishery or fish farm requires to manage seals in Scotland, a licence will only be granted if there is no satisfactory alternative and that the killing authorised by the licence will not be detrimental to the maintenance of the seal population at a favourable conservation status in their natural range.

The seal licencing system takes into account the status of local seal populations of each species. It does so through the use of Permitted/Potential Biological Removal (PBR) figure calculated by the Sea Mammal Research Unit at the University of St. Andrews. This sets, on a precautionary basis, a maximum number of animals of each species in each region around Scotland that can be safely removed without impacting on the wider regional population. The seal licencing system operates within the parameters set by these precautionary limits.

If granted, licences will authorise shooting of a limited number of seals within an area and for a period specified in the licence. In addition, individual seal licences will frequently specify additional restrictions on shooting during the breeding season. Failure to comply with licence conditions is an offence.



All seal licences include a requirement to follow the [Code of Practice](#) on Seal Management which sets out the principal that seals should be shot as a last resort.

Almost all fish farms included in applications for a seal licence already employ at least one and many a range of non-lethal alternatives and shooting is only to be used as a last resort. In addition to this, almost half of these fish farms use Acoustic Deterrent Devices (ADDs), a third seal blinds and a fifth anti-predator nets.

As we explained in our response to your Freedom of Information request from 20 November 2015, this information 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

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

The increasing use of non-lethal measures has contributed to the overall reduction of 55% of seals shot under licence since the system was introduced in 2011 and especially to the 66% reduction in seals shot at fish farms. The continual decrease in numbers of seals being shot each year in comparison with the numbers granted provides evidence that they are only being shot when all other alternatives have failed. Indeed 51% of licensees shot no seals at all in 2014.

You should, however, know that there are a range of views on the effectiveness of the various nonlethal measures and none have to date entirely eliminated the risk of seal predation.

It should also be noted that there are restrictions on the use of some non-lethal measures, including anti-predator nets and acoustic deterrents, as a result of their potential impact on other marine species.

Many acoustic deterrents disturb cetaceans and cannot therefore be deployed in areas that are important for such animals.

Anti-predator nets can be indiscriminate and result in the entanglement and drowning of other species including seabirds, otters, porpoises and dolphins.

