

**From: \$camon \$cotland**  
**To: Wirral Trading Standards**  
**Cc: Competition and Markets Authority, Westminster Trading Standards & the Royal Borough of Kensington and Chelsea Trading Standards**  
**Date: 2 April 2024**  
**Subject: Complaint Vs Supermarkets for “Responsibly Sourced” Salmon**

Please consider this a complaint against supermarkets for false marketing of farmed salmon as “responsibly sourced” and other breaches of Trading Standards, the [Fish Labelling Regulations 2013](#), [DEFRA’s Guidance on Fish & Seafood Labelling](#) and the [Green Claims Code](#).

The photographic evidence presented below was captured yesterday (1 April 2024) inside Asda, Aldi, the Coop, Iceland, Lidl, Marks & Spencer, Morrisons, Sainsbury’s and Tesco in the Wirral Trading Standards area but similarly baseless ‘[green claims](#)’ can be found at supermarkets across the UK including [Waitrose](#) (which does not have a branch on the Wirral).



The Competition and Markets Authority – who [issued a landmark ruling last month vs Asda](#) – is copied into this complaint as this issue has national significance and farmed salmon is an outstanding case study in non-compliance with the [Green Claims Code](#). Last year, the Competition and Markets Authority [announced that it would be investigating green claims made by companies in the Fast Moving Consumer Goods sector, which includes food products](#) (hopefully the issue of farmed salmon will be tackled as part of that investigation).

Please note as relevant context to this complaint that in October 2023, Coastal Communities Network and WildFish [submitted a legal complaint to the Competition and Markets Authority](#) over the Scottish salmon farming industry’s claims to be ‘sustainable’. In November 2021,

Scottish Salmon Watch, Animal Concern, Ecohustler and Fishy Business [filed complaints with the Competition and Markets Authority, Advertising Standards Authority and Trading Standards](#) over false advertising and deceptive marketing of “responsibly sourced” and “responsibly farmed” Scottish salmon sold by supermarkets in the UK.

In recent months, some of the UK’s leading retailers such as [Harrods](#), [Fortnum & Mason](#) and [Selfridges](#) in London have been caught out falsely labeling and deceptively marketing farmed salmon as wild caught or ‘sustainable’. You may have read reports via MailOnline ([Harrods and Fortnum & Mason investigated for 'dressing up cheap factory farmed salmon as luxury wild fish sold for up to £75 per kilo'](#), 12 March 2024) and The Daily Telegraph ([Selfridges forced to remove misleading sustainable salmon claims](#), 7 December 2023).

More detailed information on those cases is found in \$camon \$cotland’s complaints to Trading Standards re. Fortnum & Mason (7 March 2024) and Harrods (4 March) [online here](#) and \$camon \$cotland’s complaint to Trading Standards re. Selfridges (5 December 2023) [online here](#). I have also copied in Westminster Trading Standards & the Royal Borough of Kensington and Chelsea Trading Standards as similar complaints will soon be raised in the wider London area.

A video summary of \$camon \$cotland’s complaint is [available online here](#):



I am on 07771 541826 if you have any questions.

Yours sincerely,

Don Staniford  
Director, \$camon \$cotland

- Aldi (Prenton):



- Asda (Woodchurch):

“All Asda fish is responsibly sourced” falsely claim Asda above farmed fish which includes irresponsibly farmed Scottish and Norwegian salmon.





 Don Staniford   
@TheGAAIA

Is all Asda fish really "responsibly sourced"? @asda  
Surely Norwegian farmed salmon is the definition of "irresponsible?"  
[@Naturvern](#) [@SjomatNorge](#) [@NFdep](#) [@PerErikSchulze](#) [@NMF\\_tweet](#)  
[@seafoodnorway](#) [@NorwaySeafoodUS](#) [@UK\\_NSC](#) [@ReddVillaksen](#)



4:28 PM · Apr 1, 2024 · 1,178 Views

**- Coop (Hoylake):**

“Responsibly sourced” falsely claims the Coop on packets of irresponsibly farmed salmon products from Norway and Scotland. One Scottish smoked salmon product features an RSPCA Assured logo which has been [widely criticized as ‘greenwashing’](#) with RSPCA Assured salmon farms [lambasted by the RSPCA’s president Chris Packham as ‘lice-infested, aquatic prisons’](#).

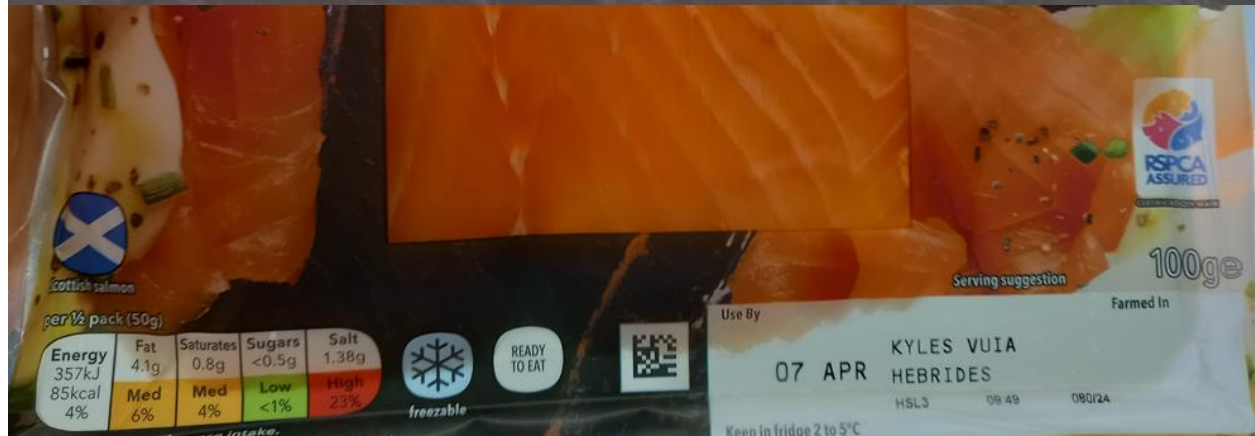


Salmon farming in Norway has been the subject of [intense media interest](#) with damning evidence of irresponsible activities [published by the Financial Times](#) and [broadcast by Norwegian TV](#).



Note that Bakkafrost’s Kyles Vuia salmon farm marketed by the Coop as “responsibly sourced” and RSPCA Assured has an [appalling environmental record](#) – including [the use of the toxic](#)

[chemical Emamectin benzoate in August 2023](#); [June 2023](#); [April 2023](#); [February 2023](#); [December 2022](#) and [November 2022](#) during the current harvest cycle for the salmon on sale:





Where is the evidence to justify the Coop's green claim that their farmed salmon from Norway and Scotland is "responsibly sourced"?

**- Iceland (Moreton):**



How can farmed salmon be legitimately marketed as 'our catch'? And why did Iceland fail to distinguish between salmon farmed in Scotland and Norway? Speak to Salmon Scotland and they will [claim that Scottish farmed salmon is "the best in the world"](#). Speak to Seafood From



Norway and they will [claim that Norwegian farmed salmon “is the most sustainable salmon in the world”](#).

This other Iceland salmon product fails to distinguish between Atlantic salmon farmed in Scotland, Norway, Iceland or the Faroe Islands:



- Lidl (Wallasey):



Where is Lidl's evidence that the salmon on sale is "responsibly sourced"? The Scottish Environment Protection Agency, for example, [revealed in March 2024 that 62 salmon farms \(all greenwashed via RSPCA Assured\) were guilty of breaching environmental laws](#) with [SEPA also accused of failing to properly police salmon farms](#).

- Marks & Spencer (Bidston):



How can M&S seriously claim that all of their Scottish farmed salmon is “responsibly sourced” when [photographic evidence](#) and [video evidence](#) has shown welfare abuse and mass mortalities at M&S’s exclusive salmon supplier Scottish Sea Farms?



When M&S claim that “M&S salmon is reared to higher welfare standards, responsibly sourced and RSPCA Assured” what evidence do they have to support this green claim? Conversely, there is [plenty of video evidence to show that M&S salmon is reared irresponsibly](#) and a [petition signed by over 115,000 people calling on M&S to stop labeling their Scottish salmon as “responsibly sourced”](#).

**- Morrisons (West Kirby):**





 **Don Staniford**   
@TheGAAIA

Fishy Labelling: When @Morrisons inform shoppers that "we freshly prepare your fish in Grimsby and Cornwall" is the supermarket misleading customers? @CMAgovUK

Put your reading glasses on & you discover the salmon in the fish display are "farmed in Scotland, Norway & Iceland"



6:28 AM · Apr 2, 2024

The marketing sign on the Morrison's fish display – with respect to fresh rainbow trout fillet – is clearly incorrect (rainbow trout is all farmed and not “caught in British waters”):



The “Caught in British waters” is so close to the farmed salmon that it is dangerously misleading:



The picture of a fishing boat and the claim that Morrisons is “supporting British fisherman” – along with the “Caught in British Waters” sign on the squid in close proximity to the farmed salmon is deceptive:



The “Responsibly Farmed” logo on the Scottish salmon is not backed up by any consumer information or evidence in support of such an audacious green claim:



Many salmon products sold by Morrisons fail to distinguish between countries:





Surely consumers should know if a salmon product is farmed in Scotland, Norway or Iceland where standards and regulations are different. For example, [mass protests in Iceland in October 2023 and shocking video evidence showcased Icelandic farmed salmon as environmentally irresponsible.](#)



 **Don Staniford**   
@TheGAATA

Please boycott "responsibly farmed" salmon from Scotland, Norway & Iceland! @Morrisons  
Stop the greenwashing & illegal labelling of farmed salmon @CMAGovUK  
[@wirraltsd](#) @WildFishCons



7:37 AM · Apr 2, 2024 · 2,127 Views

Video footage [captured of a Morrisons' truck approaching the M53 near Upton in March 2024](#) shows a 'Catch of the Day' advert with a picture of a farmed salmon:



 **Don Staniford**   
@TheGAAIA

CAUGHT @Morrisons Supermarket caught falsely advertising farmed salmon on the side of their truck - how can factory farmed fish be truly branded as 'Catch of the Day'? @CMAgovUK @ASA\_UK @wirraltsd #FishFraud #Deceptive @TheGrocer @JoannaBlythman



10:08 AM · Apr 1, 2024

Read more via: [Morrisons Caught Advertising Farmed Salmon as 'Catch of the Day'!](#)

- Sainsbury's (Upton):



Marketing Mowi Scottish salmon as “responsibly sourced” is a bad joke – with [Mowi's ASC-certification completely undermined by the use of toxic chemicals, mass mortalities and welfare abuse](#). Grotesque video footage – and a greenwashing report – [published in September 2023 by WildFish](#) reveals the irresponsible nature of Mowi's Scottish farmed salmon.



Even Mowi's 'organic' salmon has been heavily criticized by NGOs who [demanded in January 2024 that the Soil Association to stop greenwashing Scottish salmon](#). [Damning video footage shot at Mowi's 'organic' salmon farm in Loch Torridon in July 2023 led to Mowi withdrawing Soil Association certification](#).



Even from a public health perspective, a Scottish salmon product like this sold in Sainsbury's with 15% fat, is far from a 'responsible' food choice.



When Scamon Scotland visited Sainsbury's in Upton in March 2024, we found “responsibly sourced”, ASC-certified and RSPCA Assured Scottish salmon from Loch Sunart, the Isle of Rum and the Isle of Muck on sale:





Where is the proof from Sainsbury's to show that these salmon farms – all operated by Mowi – are “responsible”? Substantial video evidence to the contrary is publicly available – for example, this [video footage from Mowi's Invasion Bay salmon Loch Sunart shows welfare abuse, infectious diseases and mass mortalities](#):



Another video [published in January 2024](#) shows the irresponsible torture of RSPCA Assured, ASC-certified and ‘organic’ farmed salmon and cleaner fish in a ‘Thermolicer’ used at Mowi’s Camas Glas salmon farm in Loch Sunart in June and July 2023:



## ANIMAL WELFARE BLAST FOR SALMON FIRM

# You're in hot water with the fish torture machine



Mowi’s Isle of Rum and Camas Glas salmon farms are [amongst a list of 62 ‘non-compliant’ sites identified by the Scottish Environment Protection Agency in March 2024](#). Mowi’s ASC-certified and RSPCA Assured salmon farms have [suffered from a litany of irresponsible events which makes a mockery of the green claims advanced by Sainsbury’s and other supermarkets](#). Before making unsubstantiated and baseless green claims, Sainsbury’s should read the WildFish report: [Responsibly Farmed? Investigating the certification of Scottish farmed salmon](#).

Scamon Scotland maintains – and we [filed similar complaints vs Sainsburys with the Advertising Standards Authority in May 2022](#) and [with Trading Standards, the ASA and the CMA in November 2021](#) – that Scottish salmon (including fish greenwashed via RSPCA Assured, the ASC and Soil Association) is inherently irresponsible. Sainsbury's is guilty of fish fraud and deceptive green claims.



 **Free Salmon**  
@salmon\_free

This is how farmed salmon should be labelled.



12:50 PM · Mar 29, 2024 · 1,419 Views



**- Tesco (Bidston):**

Tesco sells “responsibly sourced” smoked salmon from Norway via The Real Seafood Co next to “free, not farmed” wild salmon from Leap:



Where is the supporting documentation from Tesco showing how Norwegian farmed salmon is “responsibly sourced”? \$camon \$cotland is fully aware of [information on irresponsibly farmed Norwegian salmon with alarming death rates and diseases](#) but consumers in Tesco may be ignorant.

Outside Tesco in Bidston is a huge poster of a farmed salmon with a British union jack flag with the claim that Tesco is “working with British suppliers”. Yet inside the Tesco superstore is full of farmed salmon from Norway and ‘Scottish’ salmon from Mowi (a [Norwegian-owned multinational](#) which [imports millions of salmon eggs from Iceland and Ireland](#)):



 **Don Staniford**   
@TheGAAlA

Caught: Tesco claim they are "working with British suppliers" yet @Tesco is shamelessly flogging farmed salmon from Norway & 'Scottish' salmon farmed by Norwegian giant Mowi who imports foreign ova (salmon eggs) from Iceland & Ireland @tesconews @MowiScotlandLtd @ScotlandSalmon



10:48 AM · Apr 2, 2024

Scottish salmon sold by Tesco is also marketed as “responsibly sourced” without any supportive proof, documentary evidence or information available to customers:



As with the Norwegian farmed salmon, Tesco fails to provide consumers with supportive documentation proving their green claims. Again, the public information on Scottish salmon farming [showcases an inherently irresponsible industry racking up record-levels of farmed salmon mortalities](#) and [even dead Mowi workers](#).


Like Sainsbury’s, Tesco sells Mowi ‘superior’ salmon which is [falsely marketed online and sold in store as ‘responsible’](#):



**TESCO** Search  
[Search with a list of items](#)

Groceries ▾ My Favourites Recipes Special Offers Easter lunch Delivery Saver

Home > Fresh Food > Chilled Fish & Seafood > Salmon & Trout > Mowi 2 Scottish Salmon Fillets 230G



**Mowi 2 Scottish Salmon Fillets**  
230G

★★★★☆ 4.5 (38) [Write a review >](#)

£5.50 £23.91/kg

[Add](#)

### Product Description

2 Scottish Salmon Fillets

For more information and recipes go to [www.mowisalmon.co.uk](http://www.mowisalmon.co.uk)

High in Omega 3: Each portion typically has 2190mg of which more than half (1130mg) are DHA and EPA. Eating 250mg of EPA and DHA omega 3 fatty acids contribute to the normal function of the heart. Make salmon part of a varied and healthy diet and lifestyle.

At Mowi, we hand select the best Scottish Salmon and are the only one to raise, prepare and pack our own salmon with care in Scotland (UK). We love our 'chefs cut' restaurant style portions to elevate any dish. Mowi is also the first Scottish Salmon brand to be ASC approved - an independent certification of responsible farming to a new high standard.

ASC - Farmed Responsibly ASC Certified™, ASC certified as responsibly farmed. [www.asc-aqua.org](http://www.asc-aqua.org), ASC-C-02028

RSPCA Assured - Certification Mark, The salmon in this product is from a producer inspected to RSPCA welfare standards by the RSPCA's independently certified farm assurance scheme.

Hand Selected, Restaurant Style Cut

Pioneering Responsible Farming Excellence Since 1964

[Leaked photos from a whistleblower](#) shows how irresponsible – and far from superior – that Mowi Scottish salmon can be:

**MOWI**

**Sea Lice Damage: Rebate**

**Uszkodzenia od wszy morskiej: Do odrzucenia**



**MOWI**

**Lesions: Rebate**

**Zmiany: Do odrzucenia**

Lesion with flesh visible > 50p piece  
Zmiany z widocznym mięsem > moneta  
50pensów



Another Mowi whistleblower leaked stomach-churning video footage – [published by The Sunday Mail in December 2023](#) – showing the truly irresponsible side of Scottish salmon:

# WHISTLEBLOWER IN FAECES SLUDGE CLAIM AT FISH HATCHERY

■ Dawn Thompson

**A whistleblower has revealed stomach-churning behind-the-scenes footage of a supermarket salmon giant's Scottish farm.**

Mowi's on-shore Highland hatchery produces millions of young fish which are then transferred to other sites. But an insider has made public a video which shows the floor thick with fish faeces from an overflowing tank.

In it, a huge waste container appears to have overflowed, leaving the sides stained and the ground carpeted in brown sludge.

As the worker walks around, the waste - which appears to have been splashed or smeared on nearby equipment - becomes ankle deep.

The latest revelation comes after 'zombie salmon' footage revealed by the Sunday Mail made headlines worldwide.

Last night Mowi strongly defended itself against environmental and welfare concerns as campaigners demanded the industry be shut down.

Activist Don Staniford said: "This lifts the lid on the horror lurking inside this salmon farm."

"It lifts the curtain on land-based salmon farming and it is truly shocking."

Mowi's Inchmore salmon farm is a horror story with seeping faeces spewing out of the tanks.

"That a whistleblower working inside Mowi feels so appalled at the welfare and



**DISGUSTING** Slurry overflowing at hatchery and Loch Torridon, main



**GRISLY** Our story defended itself on farm



# Salmon farm's slurry sickener



**Mowi Whistleblower - overflowing crap from tanks at Inchmore: land-based salmon farming is shitty!**

Don Staniford



If Tesco and Sainsbury's were being truthful, this is how Mowi Scottish salmon would be advertised and marketed:



## Summary – please stop the greenwashing of “responsibly farmed” salmon!

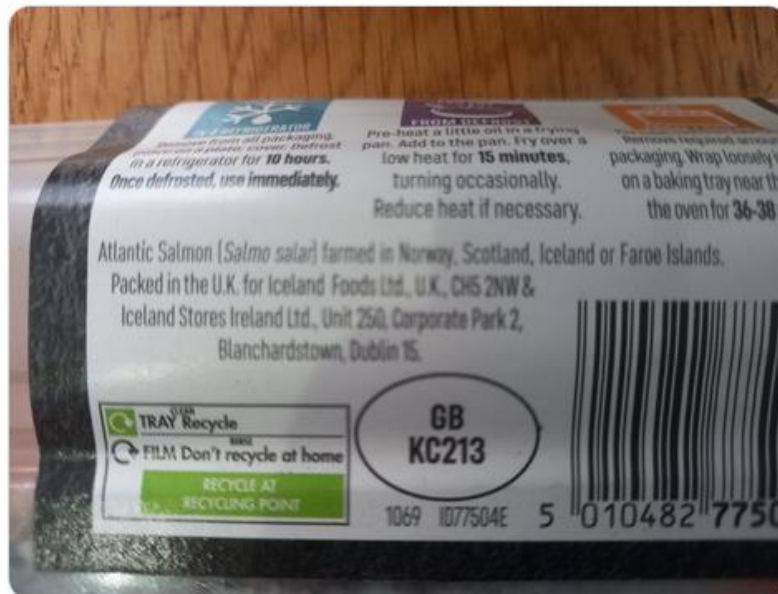
In conclusion, all supermarkets were caught breaching Trading Standards and fish labeling laws. Iceland was the only supermarket NOT to make the false green claim with respect to “responsibly sourced” or “responsibly farmed” salmon but tripped up by referring to ‘Our Catch’ on the back of a farmed salmon product from “Scotland and Norway” with another Iceland supermarket product failing to distinguish between salmon farmed in Scotland, Norway, the Faroe Islands or the country Iceland.

The use of multiple countries in the labeling of farmed salmon products is unacceptable from a consumer point of view. Surely shoppers in Morrisons deserve to be informed if their farmed salmon is sourced from Scotland, Norway or Iceland? Surely shoppers in Iceland supermarkets should be able to choose between salmon farmed in Scotland, Norway, Iceland or the Faroe Islands? For example, [over 100,000 people signed a UK petition in 2022](#) against the import of wild caught and farmed fish from the Faroe Islands – without specific country of origin labeling that is impossible!



Don Staniford  
@TheGAAIA

Anyone for playing Salmon Roulette @IcelandFoods?  
You can buy Atlantic salmon "farmed in Norway, Scotland, Iceland or Faroe Islands".  
I personally boycott ALL farmed salmon but some people may only want to avoid Faroese products for ethical reasons. Why not give them a choice?



Competition & Markets Authority and 4 others

2:42 PM · Apr 2, 2024

Moreover, even in the greenwashed world of salmon farming not all farmed salmon is accredited as environmentally ‘responsible’ by the ASC (you can search which farms are ASC-certified



[online here](#)). Scottish Sea Farms - exclusive salmon supplier to M&S – [announced their withdrawal from ASC certification in December 2023](#). And not all salmon farms in Scotland, Norway, Iceland and the Faroes can point to a welfare certification system such as RSPCA Assured ([however flawed the RSPCA Assured and ASC schemes are in practice](#)).

Suffice to say here that all supermarkets failed to provide substantive evidence to prove their green claims of “responsibly sourced” and “responsibly farmed”. Aldi, Asda, Coop, Iceland, Lidl, Marks & Spencer, Morrisons, Sainsbury’s and Tesco are all guilty of fish fraud in relation to false green claims.

The onus should surely be on supermarkets to provide documentation with respect to their green claims of ‘responsible’ Scottish, Norwegian and Icelandic salmon (Iceland appears to be the only supermarket on the Wirral sourcing from the Faroe Islands and it is the only supermarket not making the “responsibly farmed” or “responsibly sourced” green claim).

As explained at the beginning of this complaint, [a detailed dossier and complaint was submitted in October 2023](#) to the Competition and Markets Authority by WildFish and Coastal Communities Network Scotland.



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The complaint details the extensive use of the term ‘sustainable’ by Salmon Scotland in its recent communications, as well as the environmental, welfare and sustainability issues which cast doubt on this claim – including:

- The negative impact of parasites and escaped fish from Scottish salmon farms on wild salmon
- High mortality rates on the farms
- Pollution of the sea by toxic chemicals used by the industry
- Unsustainable use of other fish species as parasite ‘cleaner fish’
- Use of fish from unsustainable wild-caught fisheries to feed farmed salmon
- Increasing use of antibiotics on Scottish salmon farms
- Significant carbon footprint of Scottish salmon farming

A report - [Responsibly Farmed? Investigating the certification of Scottish farmed salmon - published by WildFish in September 2023 along with grotesque video footage](#) found salmon farms are certified by leading bodies despite substantial marine pollution, inadequate parasite control and monthly mortality rates as high as 74%.

Data published by the Scottish Government’s Fish Health Inspectorate detailing ‘Case Information’ on infectious diseases at salmon farms across Scotland and site specific mortality statistics is available [online here](#)

Data published by the Scottish Environment Protection Agency detailing the use of toxic chemicals, breaches of environmental limits, lice infestation levels, weight of dead fish, sea-bed pollution and escapes is available [online here](#)

Scottish Salmon Watch’s dossier [submitted to Trading Standards, the CMA and ASA in November 2021](#) also casts serious doubts on the green claims made by supermarkets with respect to ‘responsible’ Scottish salmon.



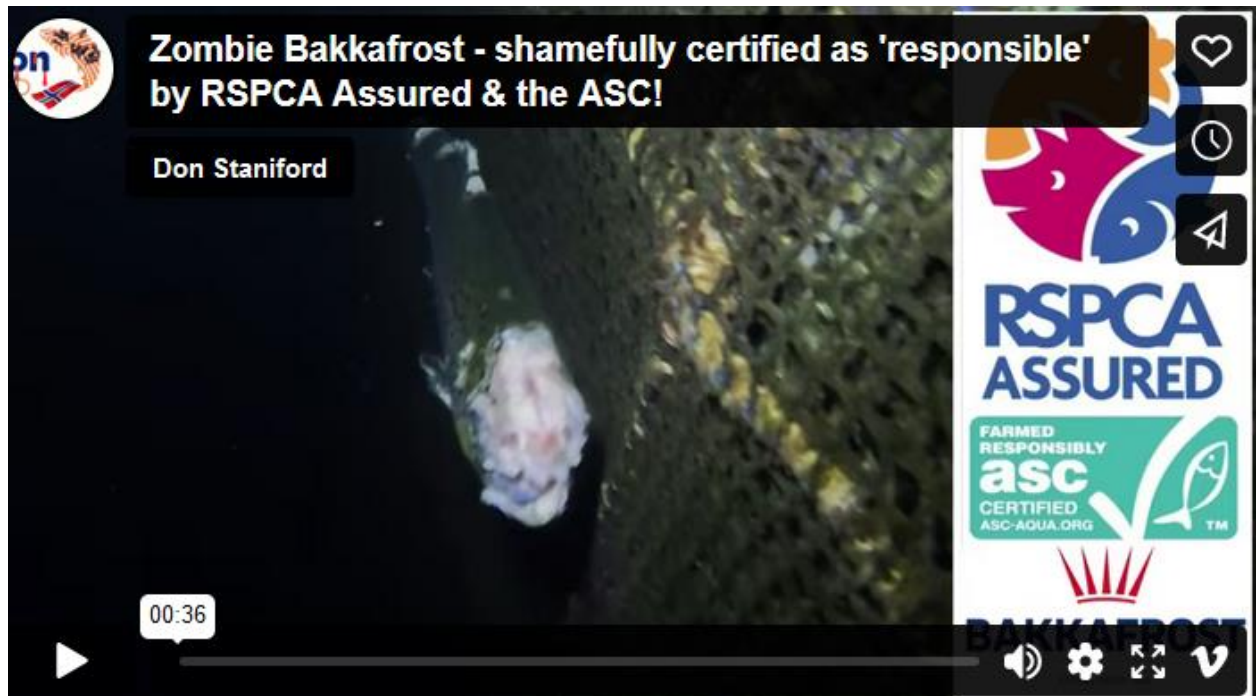
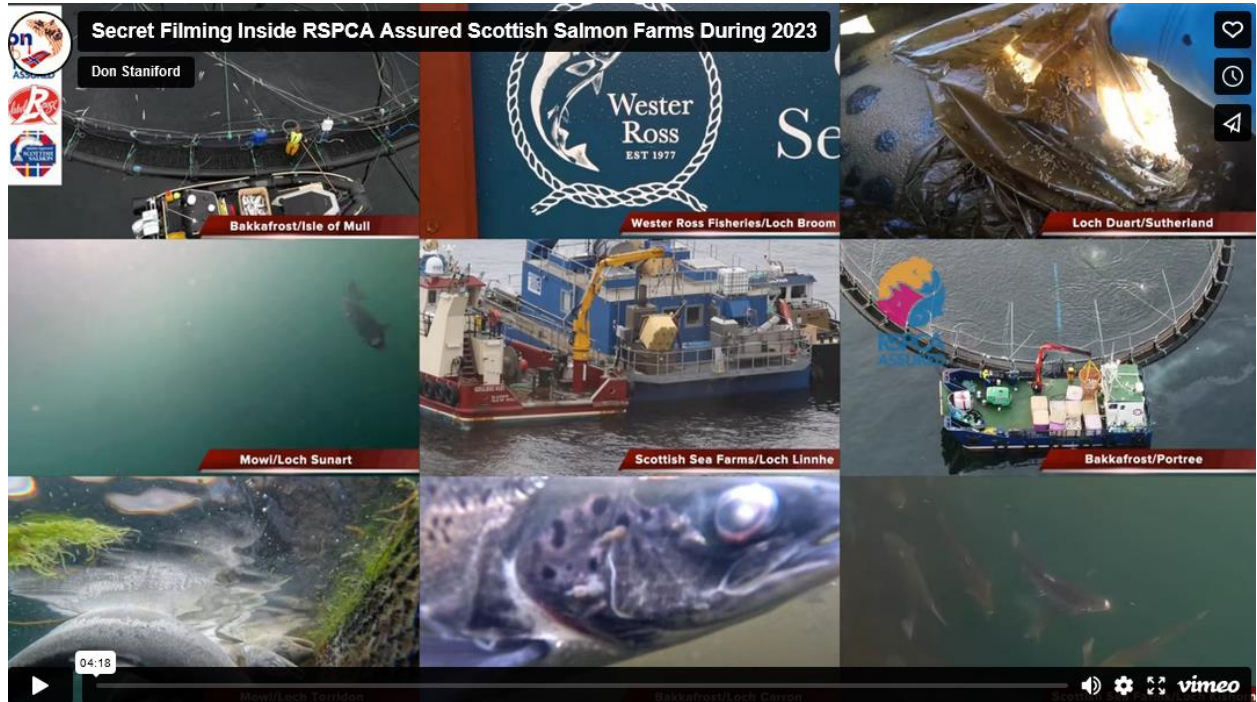
Key documents are available via:

[Trading Standards & CMA Letter of Complaint Vs Supermarkets](#) (19 November 2021)

[Hard Evidence Vs 'Responsibly Farmed' & 'Responsibly Sourced' Scottish Salmon](#) (submitted to Trading Standards & the CMA on 19 November 2021)

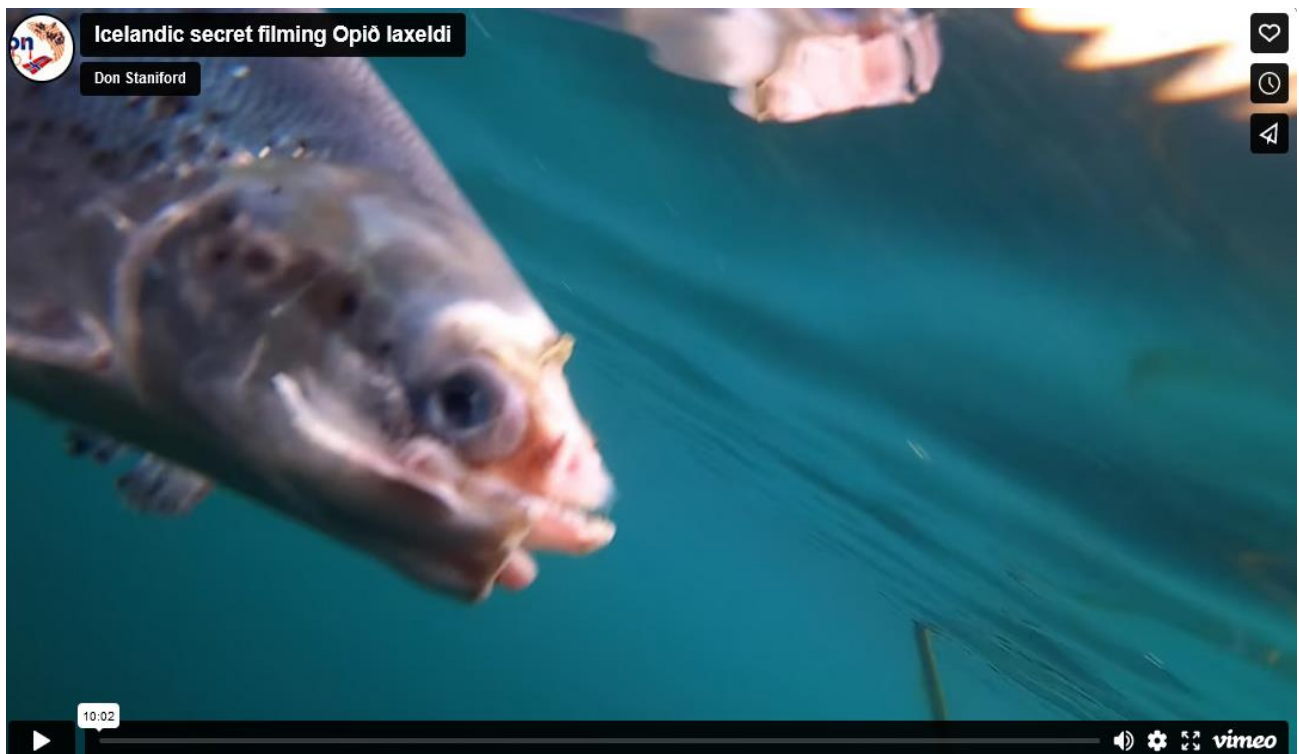
[Advertising Standards Authority Complaint & Hard Evidence Vs 'Responsibly Farmed' Mowi salmon sold by Tesco & Sainsbury's](#) (19 November 2021)

Video footage gathered via covert surveillance at Scottish salmon farms during 2023 is also available below:



Similar evidence on the irresponsible nature of salmon farming in Norway and Iceland is publicly available from various government and NGO sources and can be used to ground-truth

the shameless greenwashing of “responsibly farmed” salmon. For example, shocking video footage of welfare abuse inside salmon farms in Iceland is available here:



And gruesome photos of welfare abuse inside disease-ridden salmon farms in Norway was [broadcast by Norwegian TV in November 2023](#):

 **Salmon Scotland**  
@SalmonScotland · Follow



The tide is turning on pharmed salmon in Norway as national TV hosts a show dedicated to the welfare, cruelty, ethical & moral SCANDAL which is now at crisis point:

@MairiGougeon @GillianMSP @CVOScotland  
@AngusRobertson



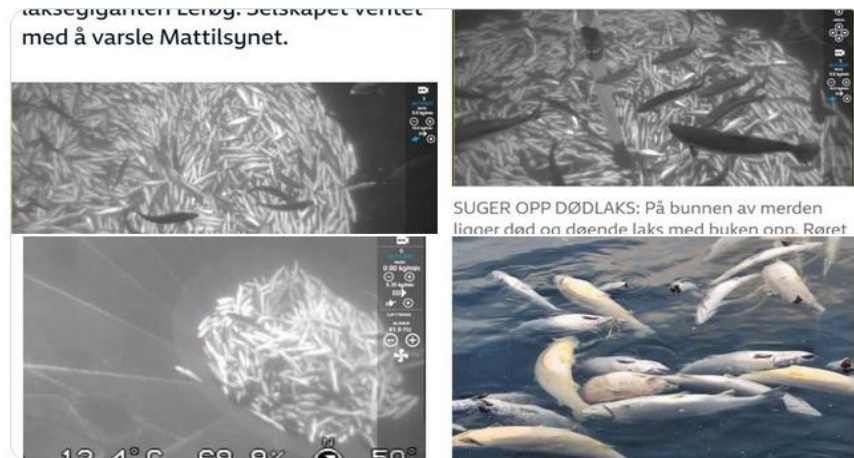
8:18 AM · Nov 18, 2023



 **Per-Erik Schulze**  
@PerErikSchulze · Follow



Norwegian farmed salmon industry is in serious trouble, violating animal health and welfare standards. New photos surfacing with national broadcaster NRK today show piles of dead, gill diseased salmon in the fish pens of seafood giant Lerøy this autumn  
[nrk.no/norge/plutseli...](https://nrk.no/norge/plutseli...)



6:14 AM · Nov 1, 2023



Further information is presented via:

[Media Backgrounder: The Pushback Vs Greenwashed Scottish Salmon](#) (April 2024)