

John F. Robins, Secretary and Campaigns Consultant, Animal Concern,  
Post Office Box 5178, Dumbarton G82 5YJ. Tel. 01389-841-639, Mobile: 07721-605521.  
E-MAIL: [animals@jfrobins.force9.co.uk](mailto:animals@jfrobins.force9.co.uk) website: <http://www.animalconcern.org/>  
Animal Concern is a pressure group registered as a non-profit making Limited Company  
(Co. No. SC109126) established in 1988 as Animal Concern (Scotland) Ltd.  
It incorporates the Scottish Anti-Vivisection Society which was founded in 1876.

**The Aquaculture Stewardship Council (ASC) was created in 2010 from a WWF initiative started in 2004 to combat the negative impacts of salmon farming. Now a stand-alone body the ASC is working on raising standards and setting good practise levels for all kinds of aquaculture around the globe. They held a consultation, which closed today, to help in the development of Fish Welfare indicators. John Robins of Animal Concern does not have a lot of time for initiatives which involve a lot of talk between exploiting industries and those who should be opposing them.**

In the early 2000's John was very critical of the RSPCA for going into dialogue with salmon farmers over the shooting of seals in Scottish waters. Nearly two decades later the RSPCA and the industry are still talking and seals are still being shot.

There were only four questions in the ASC consultation. I don't think the answers they got from John would have been what they were expecting:

### **ASC Fish Welfare Project's Terms of Reference (ToR)**

It has been known for many decades, but not widely accepted that fish feel pain, fear and stress. Ask any angler or trawlerman.

The problem has been to turn that knowledge into charts, levels and figures acceptable to the academic community or to teach fish to scream loud enough for politicians to take notice.

While you fart about looking for methods to evaluate that pain and suffering, billions of fish are subjected to horrendous lives and deaths in filthy floating factory fish farms and billions more die slow, painful deaths after being dragged from the depths of our seas and either left to suffocate in icy holds which prolong their agony or gutted alive.

Instead of spending more decades refining policy on this it would be better if WWF, RSPCA and others came out fighting hard to stop overfishing, to force Governments to police and control aquaculture and to make people aware of the simple fact that fish can and do suffer.

### **Feedback on the ASC Fish Welfare Position Paper**

My area of interest is in the suffering caused to salmon in the myriad of intensive salmon farms in Scottish waters. The majority of these farms operate under the RSPCA Assured scheme.

The welfare of fish was recognised and covered in the Animal Health and Welfare (Scotland) Act 2006. Indeed the Act was launched on the fact that it made it illegal to give goldfish as prizes in Scotland - this would not have been included in the Act had it not been for a meeting I had with one of the Civil Servants drafting the legislation.

Despite Scottish law protecting the welfare of fish, despite the RSPCA governing welfare standards at 70% of farms and despite my trying since 2006 to use the Animal Health and Welfare Act to protect farmed salmon, Scotland has one of the worst records in the world as regards the welfare of farmed salmon. Hundreds of millions of salmon die every year from disease, parasitic infestations and physical damage.

Despite masses of evidence not one salmon farmer in Scotland has been prosecuted for cruelty.

If existing laws and welfare standards cannot protect these fish what chance do you think your welfare standards will have of making any difference?

Please re-evaluate the very principal of what you are spending a great deal of time and money doing. Are you wasting resources which would be better spent fighting the industries which are denuding our oceans of fish and causing more stress, pain and suffering than any other livestock industry on the planet?

### **Feedback on the ASC Fish Welfare White Paper summary**

Your introduction to this starts with:

*“The primary purpose of this White paper is to assist the Fish Welfare Technical Working Group (yet to be established) for it to have an informed and constructive dialogue prior to drafting ‘fish welfare’-relevant indicators. The full version of this White Paper will be made public during the Public Consultation of the first Draft.”*

This reinforces my concern that you are self-indulging in an academic exercise into a problem which, long before the laser printer churns out your final draft, may be resolved through industrial overfishing, disease epidemics in floating factory fish farms and the effects of Global Warming.

Like Global Warming this issue needs urgent action, not more words. Instead of co-operating with industries built on exploitation for profit you should be fighting them, forcing them to downsize and change their practises. Campaign to persuade the public to boycott farmed fish with the vigour and resources you use to get them to foster endangered felines. There's not much point persuading the public to adopt a dolphin if the dolphin has no fish to feed on.

Perhaps it is time to tackle the real problem and campaign to curb human population growth?

## **General feedback Fish Welfare Project**

Great idea, just 50 years late.