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22<sup>nd</sup> December 2020

To Fergus Ewing MSP Cabinet Secretary for Rural Economy and Tourism,  
The Scottish Government,  
Edinburgh

Copied to Jeane Freeman MSP, Cabinet Secretary for Health and Sport.

Dear Cabinet Secretary Ewing,

My MSP, Jackie Baillie, has been in communication with you on my behalf regarding mass escapes of salmon from farms around our coast. She recently asked you about the procedures for warning the public of the possible dangers of eating salmon which have escaped from salmon farms.

Ms Baillie has sent me a copy of your reply (your reference 202000113787 of 10/12/20).

I was shocked to learn from your letter that no-one has responsibility to warn the public of the possible serious health risks from eating salmon which have escaped from farms.

In your letter you say that, "Where there has been an escape of farmed fish the Aquaculture Production Business is required to inform relevant stakeholders, and local Fisheries Trusts .....

As far as I am aware the Aquaculture Production Business does not exist as an organisation and is simply a generic term created by Marine Scotland to refer to fish farm companies.

What you are saying in your letter is that it is up to individual fish farmers to decide whether or not to warn the public if an incident at a farm has resulted in diseased or otherwise contaminated fish (perhaps heavily dosed with antibiotics, toxic parasite treatments or other medicines and chemicals) escaping into the marine food chain. I know from experience that salmon farmers and Marine Scotland have on numerous occasions had to be forced by the Scottish Information Commissioner to release information which could be even slightly embarrassing to the industry. Salmon farmers are extremely unlikely to voluntarily alert the public to potential serious health risks posed by any of the hundreds of thousands of fish which escape from farms in any given year.

It should be noted that in recent years millions of fish which have died on salmon farms have been designated as toxic waste and transferred hundreds of miles across Scotland to disposal plants which are licensed to deal with such dangerous substances. It concerns me

greatly that there is no warning system to alert the public when farmed fish, which are notoriously easy for anglers to catch, escape into our coastal waters and head for our rivers and streams.

Many places on the Clyde coast are popular with anglers, especially during the mid to late summer mackerel season which this year coincided with the escape of 48,834 salmon from a Mowi farm near Campbeltown. Many escaped farmed salmon, most likely from this incident, have been caught in the Clyde and tributaries of the Clyde.

Salmon farmers have to purge their fish of medical treatments for a period before slaughter to ensure the flesh is not contaminated with residues of medication or chemical treatments. If salmon escape soon after being treated with medicines or chemicals they could be caught by anglers and eaten while still containing potentially dangerous levels of medicines or toxic chemicals.

I urge the Scottish Government to address this problem immediately and bring in legislation to ensure the general public is warned quickly if any potentially contaminated farmed salmon escape into the wild. The salmon angling season restarts in several rivers in January and February, a time when severe storms often result in escapes from salmon farms (70,000 salmon escaped from a Mowi farm off Colonsay during storm Brendan in January this year).

Yours sincerely,

John F. Robins,  
Animal Concern

PS: On 1<sup>st</sup> December Marine Scotland issued a press release about plans to try and control the damage caused by the unregulated use of wild wrasse to reduce sealice infestations on salmon farms. In that press release you are quoted as saying; "These measures will support the sustainable growth of our valuable aquaculture industry ....". You are surely aware that the salmon farming industry is most definitely not sustainable?

Apart from the environmental damage and the huge numbers of salmon (over 25% of stock) which die during the growth cycle there is the basic fact that to produce salmon feed pellets far more wild fish have to be caught and killed than the farms produce in edible salmon. The ratio of wild fish killed to edible salmon produced can be as high as three to one and the removal of wild fish to feed farmed salmon causes disruption of the marine food chain and collapses in fisheries where people catch fish for sustenance, not massive profits. One of the reasons the Scottish Government has been forced to address the use of wild wrasse (and lumpfish) as cleaner fish in salmon farms is because that fishery is proving to be unsustainable with the risk of populations of wrasse and lumpfish being substantially reduced causing damage to marine ecosystems in areas all around the UK coast. I did not realise the extent of the damage to cleaner fish populations until I saw the large number of wrasse and lumpfish carcasses in skips filled with salmon farm morts.

I cannot think of anyone in the Scottish salmon farming industry who would describe the production of salmon as "sustainable". I believe the last time the word was used was on packets of salmon sandwiches sold by the Co-op. I asked them to identify the "sustainable"

farm supplying their salmon and they apologised for their error and removed the word “sustainable” from their packaging. I suggest, for the sake of accuracy and to avoid misleading the public, you and the Scottish Government stop describing salmon farming as “sustainable”.