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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.

To supporters of Animal Concern, Animal Concern Advice Line and Scottish Anti-Vivisection Society.

From John Robins, Animal Concern.

I've got some good news and some bad news about salmon farms. Thanks to all of you who lodged objections with Highland Council over the planning application for a new 12 x 120 metre cage salmon farm at Flodigarry. At their meeting in Inverness yesterday the Planning Committee refused the application! Well done to you and the local campaigners.

It is of course likely that the applicants will appeal the decision and, if they do, I'll let you know.

Now the bad news. I've just written to the Scottish Government and the Scottish Parliament telling them **I agree** with a statement made by an official of fish farming giant Mowi Scotland. As you will see below that's not actually the bad news. The bad news is that while I was writing that email I learned that Mowi have just lost, into what is an alien environment, 73,600 salmon. Most of them will likely starve to death or be eaten by predators but some will interbreed with already endangered wild fish.

I've sent a copy of my email to all MSPs. If you live in Scotland please email your MSPs and ask them if they will ask the Government to take action to protect the welfare of salmon in farm cages and to prosecute any company which allows fish to suffer on farms or escape to die a slow death in the wild. Details of your MSPs here:

https://www.writetothem.com/?gclid=EAlalQobChMI2e-5moiX5wIVC7DtCh0XRA8DEAAYASAAEgLY_vD_BwE

If you are not in Scotland you could write to one or all of the three Ministers (details below) with a short message urging them to act to prosecute salmon farms for cruelty and for allowing salmon to escape into the wild.

Cheers4now,

John

To: Nicola Sturgeon MSP (firstminister@gov.scot) <firstminister@gov.scot>
Cc: Roseanna Cunningham MSP (cabsececclr@gov.scot) <cabsececclr@gov.scot>; Mairi Gougeon MSP (scottish.ministers@gov.scot) <scottish.ministers@gov.scot>

EMAIL FROM: John F. Robins, Secretary and Campaigns Consultant, Animal Concern,

Wednesday, 22nd January 2020

Nicola Sturgeon MSP
The First Minister
Scottish Government
St. Andrew's House
Regent Road
Edinburgh EH1 3DG

COPIED TO: Roseanna Cunningham MSP, Cabinet Secretary for Environment, Climate Change and Land Reform and Mairi Gougeon MSP, Minister for Rural Affairs and the Natural Environment.

Dear Ministers,

I write concerning statements made last week by Mr. Ian Roberts, Director of Communications for the Norwegian owned intensive salmon farming company, Mowi Scotland.

In an article for trade magazine "Fish Farmer", Mr. Roberts makes serious allegations regarding the way governments monitor and regulate, or rather fail to monitor and regulate, the salmon farming industry. His comments reflect my own experience over the several decades in which I have been unsuccessfully calling for proper control of salmon farming in Scotland.

In the first sentence of his article Mr. Roberts states; "... **governments must step up to protect the health and safety of employees working within the laws of the country.**"

I totally agree. Last year we helped fund campaigner Don Staniford of Scottish Salmon Watch to tour various west coast salmon farms. In July Don supplied us with video showing conditions at a Mowi farm on Loch Linnhe. I am used to seeing pictures, many obtained after lengthy Freedom of Information battles with Marine Scotland, of dead, diseased and injured fish on salmon farms.

What I was shocked to see on the video taken by Don was the poor safety conditions at this salmon farm. Walkways and work areas were littered with loose equipment, nets and other obstructions which could easily have tripped and entangled workers, endangering their lives. I immediately raised this with the Health and Safety Executive.

Three days later Dr Penny Falconer of the HSE informed me; ***“I have contacted the company and brought these matters to their attention. I was given an assurance that it would be dealt with as a priority and I am currently awaiting formal confirmation that the matters you raise have been addressed.”*** This was a prompt and efficient response by the HSE.

I had also asked if the HSE made unannounced safety inspections of salmon farms and was astonished when Dr Falconer stated; ***“I am afraid we are unable to make unannounced visits to cage groups on fish farms as it is not logistically possible”***. For decades the Scottish Government has heaped praises on the salmon farming industry and made much of the jobs created and the wealth generated.

It should not have taken an unannounced visit by a salmon welfare campaigner to get the HSE to make Mowi clear up their life endangering mess and protect their workforce. Can your Government not spare a few bob from the taxes and other revenue you collect from the salmon industry and provide the HSE with a small but safe boat to make it logistically possible for them to make surprise visits to fish farm sites? Perhaps fishery protection aircraft could take aerial photographs of fish farms thus allowing the HSE to ascertain if farms are being maintained to at least minimum, if not high, safety standards?

Since its inception in 2006 I have been trying in vain to have the Animal Health and Welfare (Scotland) Act enforced on salmon farms. My first priority was to have farmers prosecuted for failing to protect their stock from the attention of predators as required under the Act. This can only be achieved by use of predator exclusion nets to keep marine mammals out of sight of the salmon in their floating cages. Fourteen years later and this law is still not being enforced.

In recent years, mainly through the work of a very small number of activists making unannounced visits to fish farms and by the Scottish Information Commissioner forcing Government Departments to release documents and photographs they had been withholding to protect the interests of salmon farming companies, we have learned that farmed salmon and the wild cleaner fish which are put into the salmon cages, are frequently suffering from physical injuries, disease and mass mortalities.

Seallice numbers on fish farms are often abnormally high resulting in salmon literally being eaten alive. Attempts to kill mass infestations of seallice using hot water has resulted in large numbers of fish being literally cooked alive.

These deaths are not counted in tens, hundreds or thousands but in millions every year. Despite this there have been no prosecutions under the Animal Health and Welfare (Scotland) Act 2006.

Police Scotland cannot use the excuse given by the HSE for not visiting fish farms. The police proved they do have the ability to visit fish farms when they turned up at one last Autumn to try and stop Don Staniford in the quite legal activity of filming near a fish farm.

The millions of “morts” routinely produced at salmon farms are classed as toxic waste and have to be transported hundreds of miles for so-called “safe” disposal. The problem is that some of the trucks used have more leaks than the Westminster Cabinet Office. Several have shed their loads of tonnes of diseased salmon on Scottish roads. Roads which cross rivers holding breeding stocks of endangered wild Atlantic Salmon which your Government has an international duty to protect.

Last autumn I asked Highland Council to investigate such a spillage only to be wrongly informed that this was a “SEPA incident”. I then discovered that five agencies share responsibility for such dangerous incidents. The Animal and Plant Health Agency, Scottish Environment Protection Agency, the relevant local authority, the Fish Health Inspectorate at Marine Scotland and Police Scotland.

There seems to be a lack of coordination between these agencies. Can you please tell me who has overall responsibility to maintain public and environmental protection in the transport of toxic waste from salmon farms to disposal facilities hundreds of miles from those farms?

It has just become public knowledge that a few days ago Mowi suffered yet another mass release of farmed salmon due to adverse weather conditions. Over 73,000 salmon escaped into the sea near Colonsay. This is the largest of three such incidents at Mowi farms in the Hebrides in just four months. Apart from the suffering caused to farmed fish which may find it difficult to survive in the wild, there is also concern over possible disease problems and corruption of the native salmon gene pool through breeding with farmed fish which may well have been reared from non-native fertilised ova imported from Norway.

An accident is something you learn from and then take action to avoid repetition. Three similar incidents in four months deserves a full investigation to determine if Mowi were in anyway negligent in their legal duty to protect their stock from unnecessary suffering and to avoid polluting the marine environment through the release of vast numbers of non-native fish.

I ask your Government to instigate such an investigation with a view to prosecuting Mowi if they are found to have been in anyway negligent in their use of cage design or materials incapable of withstanding the severe storms which are known to be commonplace off our west coast.

I look forward to your reply in due course.

Yours sincerely,

John F. Robins,
Animal Concern

The article by Ian Roberts, Director of Communications for Mowi Scotland:
<https://www.fishfarmermagazine.com/news/comment-leave-our-farms-alone/>

Health and Safety hazards at a Mowi farm:
<https://www.facebook.com/don.staniford.3/videos/10162569303130355/>

Police can access salmon farms but don't seem interested in allegations of criminal acts as defined by the Animal Health and Welfare (Scotland) Act 2006:
<https://theferret.scot/staniford-police-scotland-scottish-sea-farms/>