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**Animal Concern Ltd is a Registered Scottish Charity (No. SC050422) and a registered  
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**

RSPCA,  
Wilberforce Way,  
Southwater,  
Horsham,  
West Sussex,  
RH13 9RS

FTAO Chris Sherwood, CEO of RSPCA, Clive Brazier, CEO of RSPCA Freedom Foods  
(trading as RSPCA Assured) and the RSPCA and Freedom Food Directors and Trustees.

Dear Mr Sherwood and Mr Brazier,

I have had no response to the email (copied below) which I sent to you both on 25<sup>th</sup> March this year. I can only assume that is because you simply cannot defend your position regarding RSPCA endorsement of the cruel, unsustainable, environmentally damaging and wildlife persecuting industry contained within the filthy floating factory fish farms which are a blight on Scottish coastal waters.

Did you, as I requested, copy my email to your Directors and Trustees? If you did, surely some of them could see through your blind support for intensive salmon farming?

Once again I ask you to copy this email to your Directors and Trustees in the hope that someone within the RSPCA can see sense and get the RSPCA out of the stinking fishy mess you have got yourself into.

I've just had a quick flick through your updated Welfare Standards for Farmed Atlantic Salmon which you published in February 2021 and in which you acknowledge that salmon farmers can no longer legally kill seals after 1<sup>st</sup> March 2021. This of course is because the Scottish Government were forced by the US Government to ban the deliberate killing of seals by all salmon farmers in Scotland. The US Government has achieved this at a stroke while the RSPCA and others have been debating the issue with the salmon farming industry for the best part of two decades.

I was therefore somewhat surprised to read the following on page 14 of your current Welfare Standards for Farmed Atlantic Salmon:

***“The shooting of seals is against the principles of the RSPCA welfare standards. However, at the present time, it is acknowledged that as a last resort only, i.e. when all available non-lethal deterrents have been effectively deployed and the welfare of the fish is being compromised (i.e. they are being attacked), it may be necessary to use a lethal measure to safeguard the welfare of the fish.”***

***“The shooting of seals is not permitted, other than in exceptional circumstances (see i box below) and when all required non-lethal deterrents have been effectively deployed (see relevant Standards below), i.e. as a last resort.”***

***“An ‘exceptional circumstance’ is defined as an unexpected/unforeseen event, such as the unavoidable failure of nets, ADDs/ASDs (Acoustic Deterrent Devices/Acoustic Startle Devices), systems or other equipment used to protect the fish from seals due to extreme weather or human error, and where a seal is found to be in the act of attacking the salmon.”***

Can you tell me what I missed in either the Scottish Government announcement that no further licences to shoot seals would be issued to salmon farmers or the US Government announcement that fish imports would be banned from countries which allowed persecution of marine mammals by fishery and aquaculture interests? Unless I have missed something it appears that you are not only continuing to endorse the shooting of seals by RSPCA Assured salmon farmers, you are actually telling those farmers they can break the law protecting seals.

I have only had a quick look through your new Standards but I cannot see anything about farmers keeping seals at a distance from the salmon cages. As I explained in my email of 25<sup>th</sup> March (copied below, see pars 6 & 7) unless you ensure your approved farms do this you are endorsing a product which does not even meet the legal welfare standards for all animal farming as set out in the Animal Health & Welfare (Scotland) Act 2006.

Any chance of a reply this time?

Regards,

John F. Robins,  
Animal Concern

My email OF 25<sup>th</sup> March 2021  
RSPCA,  
Wilberforce Way,  
Southwater,  
Horsham,  
West Sussex, RH13 9RS

FTAO Chris Sherwood, CEO of RSPCA, Clive Brazier, CEO of RSPCA Freedom Foods (trading as RSPCA Assured) and the RSPCA and Freedom Food Directors and Trustees.

Dear Sirs,

I write concerning RSPCA Assured salmon farmed in Scotland. I would be grateful if you would forward this email to your Trustees, Board of Directors and any executives working in relevant areas.

For over fifteen years, in my position with Animal Concern and my previous post with Save Our Seals Fund, I tried, very much unsuccessfully, to persuade RSPCA Freedom Foods to insist that RSPCA approved salmon farms be forbidden to shoot seals and instead forced to deploy proper predator exclusion nets to keep seals and other predators well away from the salmon in the net cages.

I also described the seals discussion forum the RSPCA and others entered into with the salmon farming industry as a useless talking shop used by the industry to prevent you taking decisive action to stop them killing seals. I think I was proved right when, after over a decade of you talking with the industry, it instead took action by the US Government to finally stop salmon farmers in Scotland shooting seals. I'm proud to say that when the US Government announced their ban on the import of fish from countries which allow commercial fishery interests to persecute marine mammals they referred to a letter I sent them requesting such a ban.

While this US initiative, campaigned for by ourselves and several other organisations, was successful, the RSPCA seemed content to receive reports from their endorsed fish farms on the numbers of seals shot. Only today I received copies of a few scraps of information obtained under FOI by my colleague at Scottish Salmon Watch. These showed that in the space of only 5 days in May 2020 one of your endorsed salmon farmers, Scottish Sea Farms, killed 3 seals. Perhaps you could tell me how many seals in total were killed at RSPCA endorsed salmon farms in 2020?

Forgive me for appearing to blow my own trumpet but I am only trying to make it clear that, after forty plus years campaigning on this issue, I do know a little about what I am talking about. I hope you will take seriously what I am about to ask you.

I was instrumental in having fish welfare recognised in the Animal Health & Welfare (Scotland) Act 2006. Under that Act fish farmers, like their terrestrial colleagues, have a legal duty to protect their stock from the attention of predators. This does not mean simply stopping predators from physically attacking the fish. It requires farmers to prevent predators from getting close enough to be seen or smelled by the fish thus causing them fear and

stress. Shooting seals cannot achieve this and neither can the use of double cage nets which still allow seals to get very close to the fish. What is required are external, properly tensioned and maintained predator exclusion nets to keep seals well away from the caged salmon.

I must admit that I was wrong about the effect predator proximity has on farmed salmon. A recently published report (linked below) shows that I vastly underestimated the adverse effect this has on the welfare of the salmon. After reading that report I do not see how the RSPCA can, on fish welfare grounds, endorse any marine salmon farm which does not deploy predator exclusion nets as described above. Either insist your endorsed farms use such nets or, better still, move to closed cycle production in land based tanks. This will become even more necessary as the harmful effects of many sonic predator scaring devices cause them to be withdrawn or their use made illegal by the Scottish Government in an attempt to belatedly meet the requirements of the USA Marine Mammal Protection Act.

Finally I would appreciate it if you would tell me what you have done to address the horrific problems of salmon welfare at time of slaughter as shown by the video evidence obtained by Animal Equality UK (see the video linked below)? Since that video was published I have seen a statement by another industry whistleblower who claims the cruelty and extreme suffering shown on the Animal Equality UK video is not unique and may be commonplace in other salmon slaughtering facilities.

Salmon farming is a cruel, unsustainable and environmentally damaging industry. It is estimated that between 10 and 20 million salmon die from injury or disease on salmon farms in Scotland each year. Huge numbers of salmon also escape into the wild every year causing more suffering and environmental damage.

In the last couple of months evidence has come to light of incidents where gannets have become entangled and killed in the top nets of salmon farms. Yet another example of suffering caused by salmon farming.

If you cannot find salmon farmers genuinely worthy of endorsement by the RSPCA I ask you to stop allowing your once good name being used to peddle products cruelly produced in these filthy floating factory farms.

If, despite the vast array of evidence of cruelty to fish, wildlife exploitation and environmental damage, the RSPCA does decide to continue endorsing salmon farms can I ask you to at least close the doors on any more farms joining your scheme. Instead of calling a long overdue moratorium on the expansion of salmon farming the Scottish Government is making the huge error of encouraging the industry to rapidly increase output, aiming to double production within 10 years. Salmon farming is already totally unsustainable and the huge volume of salmon in the current system is beyond the handling capacity of the industry thus the massive numbers of mortalities and the inability to slaughter fish humanely.

Massive volumes of wild fish are caught all around the world to be processed into food pellets for farmed fish. This is causing depletion of wild fish stocks, damaging wildlife food chains and causing shortages for human populations reliant on subsistence fishing.

Do not let the RSPCA name be used to expand the market and thereby increase even further the animal suffering and environmental damage inherent in industrial scale salmon production.

Yours faithfully,

John F. Robins,  
Animal Concern

Predator related stress:

<https://www.fishfarmermagazine.com/news/genuswave-gives-salmon-a-fighting-chance-against-sea-lice/>

Animal Equality UK salmon slaughter video: <https://youtu.be/gFH-ws2g5IA>