

Subject:

FW: Fish farm problems



**E-mail from: John F. Robins, Company Secretary,
Animal Concern Ltd, Post Office Box 5178, Dumbarton G82 5YJ.
Tel. 01389-841-639, Mobile: 07721-605521.**

E-mail: info@animalconcern.org website: <http://www.animalconcern.org/>

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Established in 1988 as Animal Concern (Scotland) Limited we changed our name to Animal Concern in 1992 as several of our campaigns were international.

It incorporates the Scottish Anti-Vivisection Society which was founded in 1876.

To Lorna Slater MSP, Minister for Green Skills, Circular Economy and Biodiversity.
& Patrick Harvie MSP, Minister for Zero Carbon Buildings, Active Travel and Tenants' Rights.
The Scottish Government,
St Andrew's House,
Regent Road,
Edinburgh EH1 3DG
1st November 2021

Dear Ms. Slater and Mr. Harvie,

I write with reference to my e-mail of 14th September 2021 to you both on the subject of fish farm problems, in particular specific problems within salmon farming.

I have now received reply reference 202100241816 of 13th October sent on your behalf by Panos Pliatsikas of the Aquaculture Unit of the Aquaculture and Recreational Fisheries Department at Marine Scotland. I assume you both have copies of that letter. I also assume that you and I will receive copies of any response from the APHA after they view the video footage I linked to in my original e-mail.

Can you please tell me how a letter written on your behalf can start with the totally misleading phrase; "We support the sustainable development of aquaculture" ?

As you are no doubt aware there is no such thing as sustainable salmon farming and, while not explicitly describing salmon farming as sustainable, the letter goes on to state; “..... we are clear that the growth of the aquaculture industry must be sustainable”.

Some years ago Scottish Government Ministers frequently directly referred to salmon farming as “sustainable” as did many producers and retailers. It is now recognised that salmon farming is not sustainable and neither producers or retailers refer to it as such. Those that do quickly apologise and drop the term when we point out the error of their ways. Instead the latest marketing strapline is “responsibly sourced”, a term which lacks any legal definition.

I know that this issue is not within your Ministerial remit Mr. Harvie but I would have thought that, as Minister for the Circular Economy and Biodiversity, it was well within your jurisdiction Ms. Slater. I had written to you both as I hoped the Green Party influence within Government might be able to lift the camouflage of respectability SNP Ministers have thrown over the animal welfare and environmental disaster which is salmon farming in Scotland.

In his letter Mr. Pliatsikas states that all fish farms in Scotland are regularly inspected by Marine Scotland fish health inspectors. Can you please tell me how many such inspections took place in the last four years and how many of those inspections were unannounced? If necessary please regard this as a request under FOI legislation.

As I understand it Green Party policy on salmon farming includes a moratorium on the current massive expansion of the industry which is being encouraged by the Scottish Government. As it now appears to be Government policy that “the growth of the aquaculture industry must be sustainable”, I ask you to demand that the Government call a halt to any expansion of salmon farming until the existing industry reaches the stage of being truly sustainable.

Mr. Pliatsikas also states in his reply on your behalf that farmed fish are protected under the Animal Health and Welfare (Scotland) Act 2006. I helped to have fish included in that Act. Indeed Ross Finnie would not have been able to launch the new legislation on the fact that it banned giving goldfish as prizes had I not corrected the person in charge of drafting the Act who mistakenly believed this practise was already illegal.

Under the 2006 Act farmed fish are afforded the same legal protection as animals farmed on land. That includes protecting them from predators, including letting predators get close enough to stress and frighten the animals. Despite my repeated requests for that part of the Act to be enforced on salmon farms it never has been. Can you tell me how many prosecutions, successful or otherwise, have been brought against salmon farmers under the Animal Health and Welfare (Scotland) Act 2006? If necessary please regard this as a request under FOI legislation.

Sincerely,

John F. Robins,
For Animal Concern.