

From: [REDACTED]
Sent: 17 July 2017 00:11:49
To: scottish.ministers@gov.scot
Subject: Cruely to farmed fish

To: Mr. Fergus Ewing MSP, Cabinet Secretary

Dear Sir,

I [REDACTED] felt compelled to write about an absolute atrocity which I was horrified to hear about and which should be considered a national disgrace.

I have previously written to various organisations including the SSPCA and now feel that, due to a lack of any response, I should bring it to both your attention as the minister responsible for rural affairs in Scotland and that of the press with a hope that something can be done to stop this disgustingly cruel practice.

[REDACTED] when I was told about the mortality rate of farmed salmon due to what everyone told me was stress to the fish I was amazed that this is allowed to happen.

[REDACTED] Scottish Salmon was considered a luxury item, compared to that from overseas, and very expensive and it is now a commodity which is sold in every supermarket in the country which I suppose does benefit the economy of rural areas but at what cost? I was told that, on average, over 5% (and sometimes considerably more) of all fish farmed off the west coast and brought into the port of Mallaig for processing are dead on arrival due to the way in which they are shipped. I accept that they are not permitted to (but often do I am told because the numbers are so significant) then enter the human food chain so other than compliance with standards this is not a matter for environmental health officials because they are not breaking any law if they did adhere to the current legislation and codes of practice.

I have read a number of scientific articles about stress and pain in fish and it appears conclusive that they do genuinely suffer from this and feel pain but no one I spoke to even remotely cared about anything to do with the welfare of these farmed fish.

[REDACTED] and I know that if he took his sheep to the market or abattoir and some of them were dead on arrival the RSPCA would open a serious investigation into the reasons why and, if his procedures were such as to cause this to be a regular occurrence, he would be stopped from doing so and prosecuted.

I assume that your regulations in Scotland are similar, if not identical, to those here in England when it comes to animal welfare and I just cannot understand how you can allow this to happen. Unfortunately I suspect that Scotland is just too small and the government too interested in other matters to cause this to be a concern but, please let me assure you, it should be. Any civilized country allowing this degree of cruelty to farmed animals as a matter of course is beyond contempt.

I am not trying to single out any specific company or location because I believe, having asked a few people and checked on the internet, that this is normal and has been going on for years.

How this is permitted in the 21st century in what is supposed to be a developed

country, and especially one that tries to promote some of its iconic products to discerning consumers is beyond me especially when everyone in the industry seems to know about it.

As there does not appear to be either a political will or a desire amongst those supposedly responsible for cruelty in farmed animals I have copied this to the press and a few other organisations in a hope that narrow minded profiteering in the Fish Farm companies and political expediency in the government in Scotland won't be allowed to have this matter brushed under the carpet any longer.

Yours etc.

[REDACTED]

[REDACTED]

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E: [REDACTED]@gov.scot

[REDACTED]
[REDACTED]

Our ref: 2017/0024952
15 August 2017

Cruelty to Farmed Fish

Dear [REDACTED]

Thank you for your email of 17 July to Scottish Ministers, I am responding on behalf of Mr Ewing as aquaculture falls within my policy area.

Firstly, as you may be aware, the Scottish Government is supportive of the sustainable growth of the aquaculture industry with due regard to the wider marine environment; and alongside a thriving recreational fisheries sector. On 30 March 2017 a joint statement - endorsed by the Cabinet Secretary for Rural Economy and Connectivity and the Cabinet Secretary for Environment, Climate Change and Land Reform – was published to articulate the Scottish Government's vision for a sustainable and competitive aquaculture sector - attached at:

<http://www.gov.scot/Topics/marine/Fish-Shellfish/MinStatement>

All farmers in Scotland are under a moral and legal obligation to care for their animals, the Animal Health and Welfare (Scotland) Act 2006 covers fish (as vertebrates) and this offers farmed fish protection against unnecessary suffering and places a duty on the person responsible for the fish to ensure their needs are met. In addition, all fish farms in Scotland are regularly inspected by Marine Scotland Fish Health inspectors. They will report any significant case of poor welfare to the veterinarians in the Animal and Plant Health Agency who are responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006.

With regards to your specific concerns regarding fish transport, it is the Scottish Government's aim to ensure high standards of welfare for transported animals. The Welfare of Animals (Transport) (Scotland) Regulations 2006 make it illegal to transport fish which are unfit for transport and for any person to transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them.



In Scotland, the majority of salmon producers are signed up to the Scottish Salmon Producers Organisation's Code of Good Practice For Scottish Finfish Aquaculture. Additionally there are a number of assurance and accreditation schemes operating in Scotland including the Freedom Foods (RSPCA assured) scheme, of which 80% of the Scottish salmon farming industry is accredited under. The RSPCA scheme assesses farms against strict RSPCA welfare standards, including welfare during transport.

Earlier this year an Aquaculture Industry Leadership Group (AILG) was established. The group is tasked to deliver the sector's 'Aquaculture Growth to 2030' Strategy, launched in late 2016, which aims to double aquaculture's contribution to the Scottish economy to £3.6bn a year and support 18,000 jobs across the supply chain by 2030. We will continue to work with industry leaders, including through the newly established AILG, to ensure fish health is optimised.

Yours sincerely

[Redacted signature]

[Redacted signature]



From: [REDACTED]
Sent: 17 August 2017 09:53
To: [REDACTED]
Subject: Re: Cruelty to Farmed Fish

Dear Ms. Johnston,

Thank you for your reply.

In the best traditions of the civil service and politicians you have not addressed my concerns but have carefully avoided the issue.

The joint statement you referred to makes absolutely no mention of fish welfare and although you do refer to the Animal (Transport) Regulations it is very evident that this cruel practice is either accepted or disregarded as nothing appears to be being done to alleviate the suffering of these fish.

Your primary concern seems to be the profitability of big business and its contribution to and the economy - which is a very laudable concern, but it must be possible to achieve this without causing undue suffering and death.

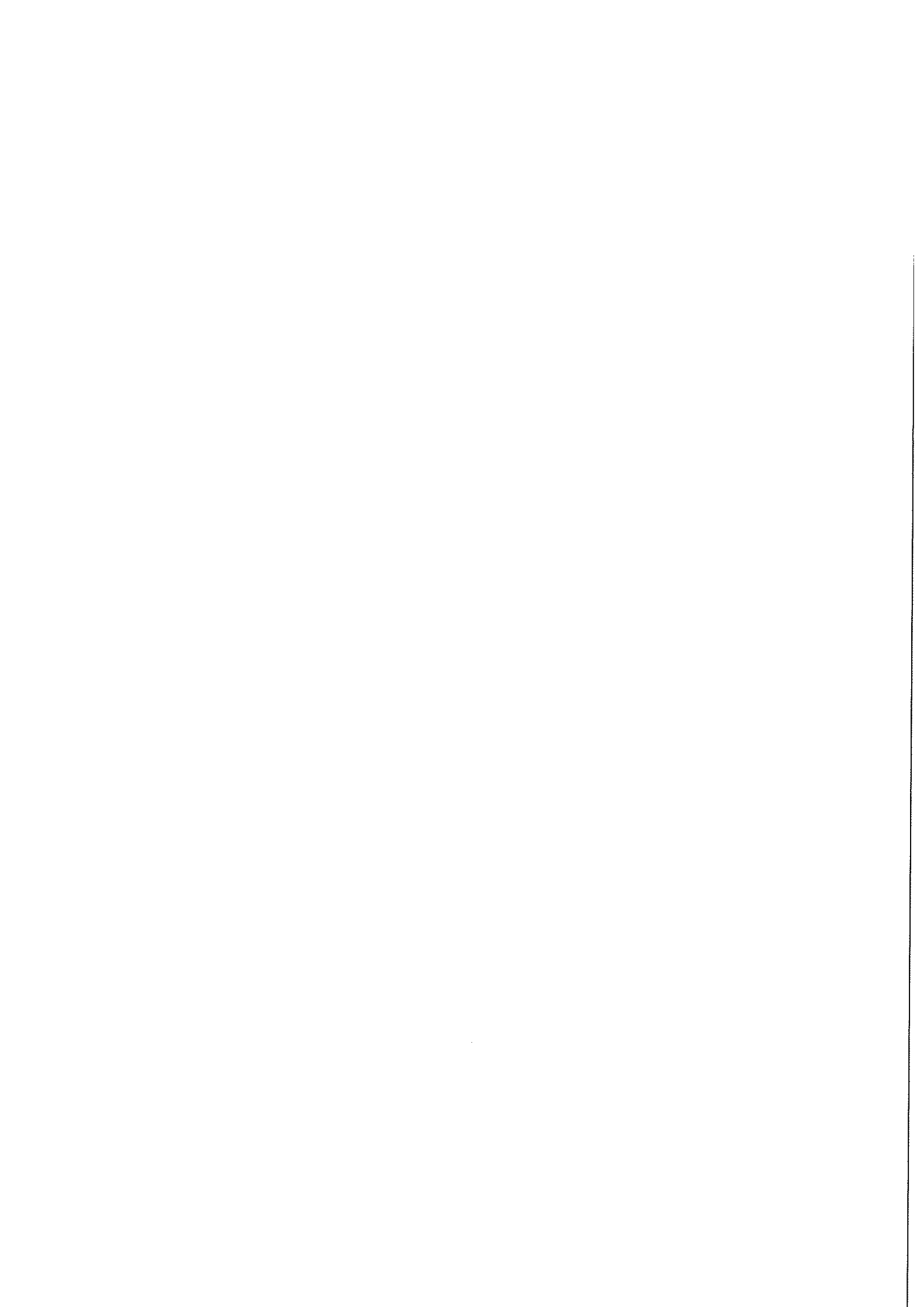
For the avoidance of doubt, I would respectfully ask, specifically, what is being done to stop a very large number of fish from suffering and dying during the harvesting operation.

I look forward to receiving a clear and concise answer.

Thanking you for your attention.

Yours sincerely

[REDACTED]



[REDACTED]@gov.scot

[REDACTED]
[REDACTED]

12 September 2017

Dear [REDACTED]

Thank you for your further correspondence regarding fish mortality during transport to harvest.

Well boat transport of live salmon has successfully been carried out by global salmon farming countries since the late 90s and in Scotland there is a robust regulatory framework in place to ensure the welfare of animals during transport. As previously stated, the majority of fish farms in Scotland go above and beyond legal requirements through participation in independently audited welfare and quality schemes. It is of utmost importance to operators to ensure stress is kept at a minimum during transport of live fish to harvest stations. This is not only with regards to ensuring fish welfare, but also with respect to producing a high quality flesh product, with a good shelf life.

We take your concerns regarding Mallaig harvest station seriously and I would like to assure you that the figure quoted to you of 'on average, over 5% mortality' of fish arriving into Mallaig harvest station is unfounded. To avoid any confusion, it is also useful to note that the station itself is able to take both live and dead haul fish – this meaning that it will sometimes take deliveries of 100% dead salmon (which have been harvested at site). Marine Scotland's fish health inspectorate has been in contact with the sole operator of Mallaig harvest station to discuss your concerns and we are satisfied that there is no problem regarding mortality of live harvest sized fish by wellboat to the station.

You may also be interested to know that this specific operator is subject to Royal Society for Prevention of Cruelty to Animals (RSPCA) Assured, GlobalGAP, Label Rouge, ISO 9001, ISO14001, Code of Good Practice and Protected Geographical Indication audits. If you would like further information about the various accreditation schemes in Scotland, or information regarding the use of wellboats by the industry, The Scottish Salmon Producers Organisation would be able to assist with your enquiries; <http://scottishsalmon.co.uk/about-us/>

Yours sincerely

[REDACTED]
[REDACTED]

