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**From:** [Redacted]  
**Sent:** 19 February 2021 12:09  
**To:** [Redacted]  
**Subject:** media query about breaches of seal shooting licences  
[Redacted]

Hi

Thank you for agreeing to help with a query for an article I am writing for [The Ferret](#). I would be grateful if you could get back to me before noon on Monday (22 February), and I would appreciate an acknowledgement of this email.

Scottish Government freedom of information responses to the campaigner, [Redacted], suggest that salmon farming companies have been reprimanded but not punished for breaching seal shooting licences. Marine Scotland wrote to Scottish Sea Farms on 14 January 2021 saying that the company "has acted outwith the conditions of your seal licence" under the 2010 Marine (Scotland) Act. It listed two conditions that were apparently breached: the requirement to report any killings within 48 hours, and the authorisation for a maximum of 12 grey seals and 1 harbour seal to be killed. The letter from Marine Scotland is attached. Latest official figures show that Scottish Sea Farms has killed 235 seals under licence since 2011, more than any other salmon farming company. Altogether more than a thousand seals have been killed by salmon farms under licences since 2011.

On 29 April 2020 a Scottish Government official reported that Mowi Scotland failed to register the shooting of a seal at Eilean Grianain salmon farm near Carradale on Kintyre within the required 48-hour period. "I appreciate that during this time these seal licence misdemeanours will not be actioned," the official stated. This is presumably a reference to difficulties caused by pandemic restrictions. Another official said that the company would be telephoned to "remind them of their responsibilities" followed up by a letter. The correspondence is attached.

In another case Mowi was said by government officials to have killed a seal at Poolewe without authorisation on 22 January 2020, though Mowi said the seal had been shot for animal welfare reasons with the agreement of the Scottish Society for the Prevention of Cruelty to Animals. The correspondence is attached.

On 14 January 2020 a government official wrote that "that there would appear to be something amiss" with the strategy for dealing with seals adopted by The Scottish Salmon Company at Loch Roag on the Isle of Lewis, following criticisms from the Sea Mammal Research Unit at St Andrews University. The correspondence is attached.

Campaigners are likely to criticise salmon farming companies for breaching their seal licences, and the Scottish Government for failing to take tougher action. They may claim that there's a risk that salmon farms will kill seals illegally now they cannot get licences to do so.

What comments would the Scottish Government like to make? Is it the case that breaches of seal licences are not being "actioned" during the pandemic? Comments by email before noon on Monday would be much appreciated.

Thank you for your help.

[Redacted]

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**From:** [Redacted]  
**Sent:** 22 February 2021 12:48  
**To:** [Redacted]  
**Subject:** RE: media query about breaches of seal shooting licences  
[Redacted]

Hi

Apologies for the delay, please see SG line below:

SG spokesperson said:

“Licences granted by Scottish Ministers under the Marine (Scotland) Act 2010 permitting the limited lethal removal of seals are subject to a number of strict licence conditions.

“Where Marine Scotland are informed of licence holders acting outwith these conditions, these are referred to Marine Scotland Compliance. Any course of action taken is based the level of evidence provided and within the current covid-19 restrictions.”

### **Background**

Changes to the Marine (Scotland) Act 2010 which came into force on 1 February 2021 mean that Scottish Ministers can no longer grant licences for the purposes of protecting the health and welfare of farmed fish and to prevent serious damage to fisheries and fish farms. Any potential offences should therefore be reported to Police Scotland.

Thanks.

[Redacted]

Scottish Government | Communications | St Andrew's House | Regent Road | Edinburgh | EH1 3DG  
t: [Redacted] m: [Redacted]

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**From:** [Redacted]  
**Sent:** 19 February 2021 12:41  
**To:** [Redacted]  
**Subject:** RE: media query about breaches of seal shooting licences  
[Redacted]  
Hi

Thanks for this. I'll come back to you with a response as soon as I can.

[Redacted]

Scottish Government | Communications | St Andrew's House | Regent Road | Edinburgh | EH1 3DG

t: [Redacted] m: [Redacted]

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[Redacted]