



OneKind
Ending cruelty
to Scotland's animals

Finlay Carson MSP
Convener, Rural Affairs and Island Committee
Scottish Parliament
By email: rural.committee@parliament.scot

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Dear Convener,

OneKind appreciates the committee's attention to farmed fish welfare, as part of its follow up inquiry into salmon farming. Following the evidence session with the Cabinet Secretary yesterday I would like to pick up on a few points.

Mainly, I would like to offer a clarification regarding the reference that was made to our previous submission to the committee. That document said that, as sentient animals that are protected under the Animal Health and Welfare (Scotland) Act, farmed fish should have statutory welfare standards and official guidance, as other farmed animals do.

As we wrote in our previous submission, farmers raising terrestrial animals must comply with species-specific requirements set out in the Welfare of Farmed Animals (Scotland) Regulations 2010. Additional detailed guidance is also published for most species, which describes how farmers can meet their legal responsibilities and recommends how to go beyond the legal minimum to achieve higher welfare. Farmed fish are not included in the 2010 Regulations and there is no official government guidance.

I apologise if the summary bullet point at the top of that document was not worded clearly enough.

We appreciate the committee picking up on that point, though, and note that the Cabinet Secretary said that she would be happy to hear any recommendations the committee has on standards. We ask that the committee considers recommending that there should be species-specific welfare standards and official guidance for farmed fish, as there is for terrestrial species.

We were also glad to hear some of the other lines of questioning around welfare issues, whether regulation is sufficient to protect welfare, and whether a moratorium on expansion of the industry is necessary. We do not believe that regulation is sufficient or that welfare, industry-wide, is adequate, and we first called for a moratorium prior to the REC committee report.

As was noted throughout the session, high mortality rates are largely outside of the industry's control, which is a grave concern.

Yours sincerely,

Kirsty Jenkins

Director of Policy