Soil Association
Spear House
51 Victoria Street
Bristol
BS1 6AD

29th January 2024

Dear Mr Robinson and Ms Browning,

We, the undersigned, represent a number of charities, NGOs and community groups across Scotland, the rest of the UK and internationally, and we write in response to the Soil Association's current consultation on its updated organic certification for UK aquaculture.

Fundamentally, we do not agree that open-net salmon and trout (finfish) farms should be included in your organic certification programme. The negative environmental impacts of the open-net salmon farming industry are completely counter to the organic principles of the Soil Association, and we believe the certification is a reputational risk for your organisation, misleading to consumers and an unacceptable greenwash of an inherently unsustainable industry. **We are therefore calling for Soil Association to remove organic certification from salmon and trout farms.**

WildFish published a report last year which found that certification is failing to adequately protect the marine environment and fish welfare. The report, ***Responsibly farmed?***, found that certification schemes for Scottish salmon require lower standards than might reasonably be expected by consumers, while breaches of the standards are rarely enforced.[1] Some examples of the limitations of the Soil Association organic standard (and proposed updated standard) are outlined below:

Mortalities
We acknowledge that the updated standard aims to address the gap in requirements around mortality levels on farms. However, as is the case with other certification schemes in the Scottish salmon farming industry, the suggested amendment relates only to reporting mortality incidents above specified thresholds (already required under the industry's Code of Good Practice voluntary reporting regime (2015)[2]) and does not impose any limit on the mortalities permitted. In practice, this means that farms experiencing eye-watering mortalities are able to continue to be marketed and sold as 'organic', as long as said mortality levels are merely reported to Soil Association.[3] This does not address the fundamental issue that high mortality rates are indicative of unsustainable farming practices, both from an environmental and welfare perspective.

Sea lice
Parasitic sea lice pose a threat to the survival of wild Atlantic salmon, recently reclassified by the IUCN as endangered[4], as well as impacting on farmed salmon welfare. It is difficult to see the 'added value' of Soil Association's organic standard in this area, even in its updated form, as the requirements do not go beyond the industry's Code of Good Practice and requirement of Regulations. For example, the suggested amendment on sea lice reporting (that producers must "assess and document [their] infestation rates of sea lice regularly") is

[1] WildFish | Responsibly Farmed?
[2] Fish Health Inspectorate | Mortality information
[3] See page 12 of the attached 'Responsibly Farmed?' report for an example of this.
[4] ICUN Red List | Atlantic salmon (Great Britian subpopulation) endangered status

something that is already required by law, under The Fish Farming Businesses (Reporting)(Scotland) Order 2020.

The proposed updated standard suggests requiring farms to comply with the Code of Good Practice (CoGP) thresholds. However, there is no mention in the updated standard about what action will be taken if farms breach these thresholds, and at what point certification will be rescinded. As with the proposed requirements on mortalities, the focus is on reporting actions taken by the farm, and not on the outputs and potential impacts of that farm on the environment. Patently, those impacts, and not mere reporting requirements, should be the focus of any certification that claims to "sustain the health of soils, ecosystems, animals, people".

Chemicals use
It is disappointing to see that the proposed updated organic standard still permits allopathic (chemical) treatments twice per year per farm. These include pesticides that are known to be toxic to marine life; for example, Deltamethrin, which has a half-life of 140 days, is known to be highly and acutely toxic to the European lobster and other crustaceans. It also represents a significant risk to particle-ingesting organisms and burrowing invertebrates, which are necessary to break down organic matter and fertilize the seabed, enhancing ecological biodiversity and ecosystem health.

Allopathic (chemical) treatments are not limited to the marine production phase of production, with the known carcinogen formaldehyde frequently used to treat young salmon on Soil Association certified freshwater hatcheries. After treatment, this potentially toxic chemical is released directly into surrounding waterways, including waterbodies that support endangered species, including wild Atlantic salmon.

Cleaner fish
We are also concerned by the heavy promotion of cleaner fish use in the updated standard; in particular the permitted use of wild caught wrasse. Wrasse are a keystone species within the inshore rocky reef and kelp beds they inhabit. A highly territorial species, local populations are highly vulnerable to collapse, over exploitation and localised depletion. The millions of cleaner fish, including wild wrasse, used on salmon farms across Scotland are then culled at the end of a production cycle (18-24 months) – if they do not perish before this point, as mass mortality events of cleaner fish on farms are common. The ecosystem impacts of taking these keystone species from the wild is unknown, and so promotion of their use in salmon farming is at best irresponsible; at worst, it is environmental vandalism.

Wild-caught fish as feed
As carnivorous species, farmed salmon and trout require substantial quantities of wild-caught fish in their feed, in the form of fishmeal and fish oil (FMFO). Heavily reliant on reduction fisheries as the main source of FMFO, companies are increasingly sourcing from the Global South, in places like Mauritania, South Africa, Chile and Peru. The demand for wild-caught fish from these waters has led to overfishing, the depletion of local livelihoods, and coastal communities facing the threat of malnutrition. Moreover, this large demand for FMFO derived from wild-caught fisheries is likely to have substantial and far-reaching ecological impacts, including in unique environments such as the Antarctic, where some salmon producers are sourcing krill for feed.

Time to remove certification
The Soil Association summarises organic farming in the following way: "Organic farmers aim to produce high-quality food, using methods that benefit our whole food system, from people to planet, plant health to animal welfare."

Open-net finfish farming is the antithesis of this definition. Intensive farming in our seas creates a breeding ground for parasites such as sea lice, and diseases. These transfer to wild fish, causing severe, sometimes fatal, damage. To treat this issue, salmon farming companies turn to chemicals; these poison the seabed, killing crustaceans and other marine life. To reduce use of chemicals, companies have started 'physical treatment' – such as pumping salmon through mechanised hot water baths to rid them of lice. These 'treatments' then leave the farmed fish stressed or physically damaged, rendering them more susceptible to diseases; and so, the cycle continues.

If a food production system cannot balance environmental impacts with fish welfare, without use of harmful chemicals, plundering ecosystems or use of treatments which in turn often prove fatal for the farmed salmon, this is not a sustainable food production system, and is absolutely not a food production system that should be endorsed by the Soil Association.

In the context of the Soil Association being an approved control body under applicable Regulations, we would expect any certification you apply to any sector to meet the general objectives and principles of organic production.

We would therefore urge you reconsider the inclusion of finfish aquaculture farms in your Organic Standard.

We would be happy to meet to discuss this further.

Yours sincerely,

WildFish.
Coastal Communities Network Scotland
PESTICIDE ACTION NETWORK UK
BLUE MARINE FOUNDATION
AFFtheCLYDE
Isle of Arran COAST
FEED BACK
INSIDE SCOTTISH SALMON FEEDLOTS
LONG LIVE LOCH LINNHE
Off the table.
$camon SCOTLAND
Scottish Salmon Think-Tank
Sealife Adventures
Skye & Lochalsh Environment Forum
a Bridge to Biodiversity
Skye Communities for Natural Heritage
MAR Y TIERRA
Clayoquot Action
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EFI Ethical Farming Ireland
GSFR GLOBAL SALMON FARMING RESISTANCE
LIVING OCEANS
LOWCOAU
NATIVE FISH SOCIETY
NOFF
NASF
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