



## **RSPCA / Freedom Food certification of Scottish farmed salmon**

**A report for the Salmon & Trout Association**

**January 2013**

## The RSPCA and Freedom Food

- 1.1 The Royal Society for the Prevention of Cruelty to Animals (RSPCA) is a well-respected and long-established charity and has made considerable progress with respect to the welfare of farmed animals in the UK over many years.
- 1.2 Freedom Food is the RSPCA's farm assurance and food labelling scheme.
- 1.3 Freedom Food is advertised as the only UK farm assurance scheme to focus solely on improving the welfare of farm animals reared for food.

*"The Freedom Food scheme covers every stage of a farm animal's life, each stage governed by strict and compulsory RSPCA welfare standards. So not only do we inspect farms against the RSPCA welfare standards, but we also check the animals are handled, transported and slaughtered to the RSPCA's standards too"<sup>1</sup>.*

- 1.4 The responsibility for setting the welfare standards used by Freedom Food lies with the RSPCA farm animals department.
- 1.5 Freedom Food's responsibility is limited to carrying out formal assessment of farms and recording areas of both compliance and non-compliance to the standards. The Freedom Food assessment process is repeated annually and between assessments all members can be subjected to unannounced visits from RSPCA farm livestock officers who, during their visits, check to confirm continued compliance.
- 1.6 Freedom Food state that *"if a member fails to comply with the rules of the scheme, their membership is withdrawn"*<sup>2</sup>.

## What is the relationship between Freedom Food Limited and the RSPCA?

- 2.1 Freedom Food Limited is a company limited by shares. The RSPCA is the sole member of Freedom Food Limited.
- 2.2 The membership of the board of directors of Freedom Food Limited in 2011 included 5 members of the Council of the RSPCA and the Chief Executive of the RSPCA, Mr Mark Watts. Freedom Food Limited's *"ultimate parent and controlling entity is the Royal Society for the Prevention of Cruelty to Animals"*<sup>3</sup>. In 2011, there were only 4 directors of Freedom Food Limited who were not associated directly with the RSPCA. It is clear therefore that the RSPCA remains the governing hand behind Freedom Food Limited.

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<sup>1</sup> [http://www.rspca.org.uk/freedomfood/aboutus/-/article/FF\\_AboutUs](http://www.rspca.org.uk/freedomfood/aboutus/-/article/FF_AboutUs)

<sup>2</sup> <http://www.rspca.org.uk/freedomfood/aboutus/howweoperate>

<sup>3</sup> Freedom Food Limited, Report and Financial Statements, 2011

## **The legal objects of Freedom Food Limited**

- 3.3 The legal objects of Freedom Food Limited are (a) to prevent cruelty to animals by the promotion of humane farming, transportation, marketing and slaughter of farmed animals, in particular but without prejudice to the generality of the foregoing by implementing a set of rearing and handling standards approved from time to time by the RSPCA; and (b) to otherwise prevent, suppress or alleviate cruelty to animals whether within the United Kingdom or elsewhere<sup>4</sup>.
- 3.4 There appears to be nothing within the objects of Freedom Food Limited that empowers it to become involved in matters relating to wider environmental impact or the impact upon wild salmonids as opposed to the welfare of farmed fish. The only possible avenue by which such work would fall under the objects is if one considered the impact upon wild salmonids via the spread of parasites and disease to constitute 'cruelty' as per object (b).

## **Freedom Food certification of farmed Atlantic salmon**

- 4.1 Freedom Food certification of farmed Atlantic salmon is overseen by two RSPCA/Freedom Food farmed salmon working groups (freshwater and seawater). The membership of the working groups is set out on the Freedom Food website<sup>5</sup>.
- 4.2 Of the 19 members of the working group, 15 are either fish farmers or from companies with a direct commercial interest in fish farming, for example, fish transport companies. The only members of the working groups not with a financial link to fish farming are Mr John Avizienius who leads on farmed fish welfare for the RSPCA, Ms. Alice Clark an animal welfare specialist with the RSPCA and an unnamed RSPCA Farm Livestock Officer and unnamed Freedom Food Assessor. Mr David Henderson, previously an independent chairman of the groups, is no longer listed.
- 4.3 Companies that operate fish farms represented on the groups include:
- Wester Ross Fisheries Limited (2 members)
  - Loch Duart limited (2 members)
  - Scottish Sea Farms (3 members)
  - Marine Harvest (one member)
  - Lakeland Smolt Limited (one member)

## **Does it cost anything to be certified?**

- 5.1 The Freedom Food certification scheme applies a tariff to salmon farms and farmers must pay a minimum membership fee of £475 per farm site plus a licence fee of 0.7 pence per kilogram of gutted weight made available for sale<sup>6</sup>.

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<sup>4</sup> Freedom Food Limited Articles of Association, 4<sup>th</sup> February 2010, Companies House

<sup>5</sup> [www.rspca.org.uk/sciencegroup/farmanimals/standards/salmon](http://www.rspca.org.uk/sciencegroup/farmanimals/standards/salmon), as at 20<sup>th</sup> September 2012

<sup>6</sup> CMI Certification Freedom Food Scheme Minimum Membership Fee and Licence Fee, undated

5.2 This appears to mean that, for example, the typical farm production, over a two year cycle, of 300,000 fish at 3 kilograms gutted weight each, would trigger a licence fee of £6,300 for that one farm.

5.3 It is however difficult to put a figure on Freedom Food's income from certification of farmed salmon.

5.4 The annual salmon production of the Scottish salmon-farming industry was 158,013 tonnes in 2011<sup>7</sup> and is slowly rising. The Scottish Salmon Producers Organisation (SSPO) states that more than 90% of Scottish salmon will be farmed to RSPCA Freedom Food welfare standards within the next two years<sup>8</sup>. Allowing for a 25% difference between the weight of fish harvested and of gutted fish, this would imply a revenue stream to Freedom Food of between £800,000 and £1 million per annum.

### The standards – animal welfare or environmental?

6.1 The RSPCA's welfare standards for farmed Atlantic salmon were first published in July 2010<sup>9</sup> and the October 2012 version is available on the RSPCA website<sup>10</sup>. The standards have been subject to some minor amendment since their first publication.

6.2 The standards cover a number of features of fish-farming, from matters dealing with freshwater stages, management and stockmanship, husbandry practices, equipment and environmental quality, feeding, health, transport, smolt transport, wellboats, slaughter and, finally, **wider environmental impact**.

6.3 The RSPCA's website states that "*Freedom Food salmon must be given more space to swim, good water quality and oxygen levels in every tank they house, even feeding with observation, **minimum environmental impact to other wild fish or water life**, smooth net pens, gentle and short handling only when necessary and trained and competent farm staff looking after welfare standards*" (emphasis added)<sup>11</sup>.

6.4 Standards that apply to the wider environment include, for example:

6.4.1 Standards H 4.1 to H 4.6, dealing with sea-lice and closely reflecting the salmon farming industry's own Code of Good Practice. The general requirement is that farms must take all reasonable steps to minimise the gravid lice population as per the requirements of the Aquaculture and Fisheries (Scotland) Act 2007.

6.4.2 Standards EVI 1.1 to EVI 5.1 are general environmental requirements.

6.4.3 EVI 1.1 requires that an Environmental Impact Plan must be drawn up and complied with.

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<sup>7</sup> <http://www.scotland.gov.uk/Publications/2012/09/8092>

<sup>8</sup> [http://www.scottishsalmon.co.uk/corporate/standards/freedom\\_food.aspx](http://www.scottishsalmon.co.uk/corporate/standards/freedom_food.aspx)

<sup>9</sup> RSPCA (2010) RSPCA Welfare Standards for farmed Atlantic salmon, July 2010, pp71

<sup>10</sup> <http://www.rspca.org.uk/sciencegroup/farmanimals/standards/salmon>

<sup>11</sup> [www.rspca.org.uk/freedomfood/wheretobuy/salmon](http://www.rspca.org.uk/freedomfood/wheretobuy/salmon) as at 20th September 2012

- 6.4.4 EVI 1.2 requires compliance with the industry's Code of Good Practice.
- 6.4.5 EVI 2.1 requires that every reasonable step is taken to prevent the escape of farmed fish.
- 6.4.6 EVI 2.2 requires farms to be designed so that they are not damaged by adverse weather conditions.
- 6.4.7 EVI 2.3 requires a containment plan to be in place.
- 6.4.8 EVI 2.4 requires that the containment plan details what is to be done if fish do escape.
- 6.4.9 EVI 4.1 requires following of the farm in accordance with the Environmental Impact Management Plan [it is not clear whether this is the same plan as the Environmental Impact Plan referred to in EVI1.1].
- 6.4.10 EVI 5.1 requires that farms must be kept tidy and free of litter and that waste be disposed by approved method.

6.5 Freedom Food certification appears therefore to be aimed not only at securing the welfare of the farmed fish but also at requiring improved environmental performance of fish farmers, beyond what might be required for the welfare of the farmed fish alone, and it is these standards which this report seeks to examine and compare to the reality of achievements on the ground.

6.6 The extent to which the Freedom Food certification, although dealing primarily with animal welfare, is viewed by others as addressing the impact on the wider environment can be seen from the Greenpeace website which states:

*"Freedom Food standards developed by the RSPCA for farmed fish are also good although the standards are primarily welfare based, the better environment which they provide for the fish not only produces healthier fish, but **also reduces the impact on the marine environment around the farm.**"<sup>12</sup>*

6.7 The Scottish Salmon Producers' Organisation adds to the confusion by stating, on its webpage entitled "Freedom Food" that:

*"the Scottish salmon industry is committed to an **ever improving environmental performance** and animal husbandry for which they have an enviable record"<sup>13</sup>.*

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<sup>12</sup> [www.greenpeace.org.uk/oceans/what-you-can-do/better-buys-what-fish-can-i-eat](http://www.greenpeace.org.uk/oceans/what-you-can-do/better-buys-what-fish-can-i-eat)

<sup>13</sup> [www.scottishsalmon.co.uk/corporate/standards/freedom\\_food.aspx](http://www.scottishsalmon.co.uk/corporate/standards/freedom_food.aspx) as at 20th September 2012

## Raising concerns over the Freedom Food environmental standards

- 7.1 The Salmon & Trout Association (S&TA) has concerns that those standards applied by Freedom Food that purport to take account of the wider environmental impact on wild fish and the impacts on wild fish from parasites and disease spread from fish farms are not rigorous enough.
- 7.2 These concerns have been raised with the RSPCA and Freedom Food in detailed correspondence over two years.
- 7.3 For example, mere compliance with the industry's Code of Good Practice on permissible on-farm sea-lice numbers is not necessarily protective of wild salmonids, as recognised by Marine Scotland Science, the Government's fisheries scientists<sup>14</sup>:

*"there is evidence of an effect of lice from fish farms on sea trout, although the extent to which the fish populations are affected is not clear. It appears that the range of effect of lice is at least 14km from farm source. This range will depend on both movements of lice and trout, which are not well understood. There is no published evidence of an effect of lice on trout at a population level, however, such an effect would be expected in view of the high infestation intensities observed near farms in the second years of salmon production cycles....the behaviour of sea trout differs from salmon in that they remain in the area of origin for considerable time after migrating to sea leading to increased chance of exposure to infective stages of sea lice. The Code of Good Practice for Scottish Finfish Aquaculture (CoGP) sets a trigger level for sea lice treatment at different times of year, it should be noted that this does not set a lice count level that farms have to keep numbers below.... It should also be noted that an ovigerous adult female louse may produce up to 1000 eggs. For example a farm holding 400,000 fish, even if it follows the CoGP, could potentially release 200M nauplii into the local environment significantly increasing infection pressure in the area....."*

*There is evidence that stage of farm cycle relates to level of lice infestation on sea trout with higher levels of infestation during the second year of production when lice numbers are known to be greater on farms. This relationship has been noted in a number of areas and was found to be significant across a 10-year period in Loch Shielraig and across the Scottish west coast in 2002-03".*

- 7.4 This, along with the views of many other fisheries scientists in many published papers, would suggest that Freedom Food standards H4.1 to H4.6 are not sufficiently stringent to protect wild fish - particularly wild salmonid smolts running to sea for the first time - from damage caused by the production of massive numbers of juvenile sea lice by fish-farms.
- 7.5 Further the RSPCA does not support the publication of farm-specific sea-lice data as part of the Freedom Food scheme as *"this would be because you could not differentiate data from Freedom Food accredited farms from the data from non-*

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<sup>14</sup> Orkney Council Planning and Protective Services Committee, Report by Director of Development and Environmental Services – proposed fish farm at South Cava, Scapa Flow, Orkney, 6<sup>th</sup> July 2011

*Freedom Food accredited farms simply because the data would be aggregated per region.*<sup>15</sup> This puts the RSPCA out of step not only with every wild fish conservation group in Scotland, but also with eminent fisheries scientists, SEPA, SNH and all west coast local authorities, all of which support the introduction of a legal requirement on fish-farmers to publish farm-specific weekly sea-lice data.

- 7.6 In general, the wider environment standards required by the RSPCA/Freedom Food certification are not substantively different from those already required by the Code of Good Practice drawn up by the aquaculture industry itself or under applicable minimum legal requirements.
- 7.7 While EVI 2.1 requires that every reasonable step is taken to prevent the escape of farmed fish, at law, anything less than reasonable steps should be considered negligent at common law, leading to liability if those escaped fish then cause damage (for example, to wild fisheries).
- 7.8 The same is true of EVI 2.2. If fish-farms were not designed to withstand adverse weather, then their siting on the west coast and in the western isles of Scotland - where inclement weather is an annual event - would rightly be considered to be negligent, if consequent escapes of farmed fish caused damage to wild fisheries.
- 7.9 EVI 2.3 requires a containment plan to be in place. However, Schedule 2 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 already makes that a legal requirement on all fish-farms.
- 7.10 EVI 2.4 requires that the containment plan details what is to be done if fish do escape, but that is already required by the salmon industry's own Code of Good Practice, Annexes 14 and 15.
- 7.11 EVI 4.1 requires following of the farm in accordance with the Environmental Impact Management Plan, but the following period of each farm is usually already stipulated in the licence granted under the Controlled Activities Regulations<sup>16</sup> by SEPA.
- 7.12 EVI 5.1 requires that farm waste must be disposed by approved method. Anything less would be unlawful and contrary to statutory waste management controls applied by SEPA.
- 7.13 Overall, it is not possible to discern any environmental standards in the Freedom Food standards that are more stringent than the industry's own Code of Good Practice or those required by minimum legal requirements.
- 7.14 Further, although the Freedom Food standards emphasise proper record keeping, Freedom Food has made it clear to the S&TA that documentation relating to farms visits, certification, audits and indeed the identity of particular farms accredited under the Freedom Food scheme is commercially confidential and will not be

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<sup>15</sup> Letter to the Salmon & Trout Association 31<sup>st</sup> August 2011 from John Avizienius, Deputy Head of Farm Animals at the RSPCA

<sup>16</sup> The Water Environment (Controlled Activities) (Scotland) Regulations 2011

published, making the certification of farms under the RSPCA / Freedom Food scheme opaque at best.

- 7.15 The S&TA's requests for sight of a typical Environmental Impact Plan, as required by standard EVI 1.1, together with any audits or monitoring reports of any particular farms as against the standards applied, have been declined by the RSPCA on grounds of commercial confidentiality. When asked to supply typical documents from any certified farm, the RSPCA replied that it *"would suspect that Freedom Food would have data protection issues to consider before making publicly available data from individual member farms on any issue relating to their membership"*.
- 7.16 In relation to Environmental Impact Plans - required by standard EVI 1.1 - again the RSPCA states that it would be *"unsure what would be achieved by your proposal of making these plans available to the general public"*<sup>17</sup>.
- 7.17 Despite this lack of transparency, in the S&TA's view, it is highly likely, perhaps inevitable, that Freedom Food-certified farmed salmon will be harvested from fish-farms that the S&TA and other wild fish conservation bodies believe are inappropriately located, and that data from SEPA shows are causing or have caused an unacceptable environmental impact on the benthic environment of the sea lochs concerned. These farms may also be having a negative effect on wild salmonid fish, principally through the production of sea-lice parasites and transmission of other diseases from fish-farms to wild fish.
- 7.18 Despite the S&TA meeting with the RSPCA and Freedom Foods in July 2011 – and the S&TA subsequently providing detailed suggestions (see Correspondence in Annex A) as to how to improve the Freedom Food standards, the RSPCA rejected all suggestions and called a halt to further communication with the S&TA stating that *"we could continue with a prolonged dialogue over the points upon which we disagree but I fear that this would not yield much in the way of progress."*<sup>18</sup>
- 7.19 The S&TA has continued to supply copies of its research to the RSPCA particularly in relation to the sea-lice issue and seabed pollution problems at farms known to be certified by Freedom Foods.
- 7.20 Overall, the S&TA believes that, at best, the Freedom Food certification provides a "fig leaf" for the farmed salmon producers to shield themselves from legitimate criticism of their wider environmental performance and damage being caused to wild fish.

### **Which farms are certified?**

- 8.1 It would seem obvious that for a certification scheme to promote good practice, in whatever field, it must be possible to identify which farms are certified and which are not, in the hope that consumers ensure that purchase are only made from certified farms.

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<sup>17</sup> The S&TA asked Freedom Food for access to a typical set of inspection and enforcement documentation relating to any particular fish farm and a solicitor's undertaking was offered in order that those items would be kept confidential and used only to make recommendations to the RSPCA / Freedom Food – this was also refused.

<sup>18</sup> Letter to Guy Linley-Adams, Solicitor to S&TA, 25<sup>th</sup> November 2011 from John Avizienius, RSPCA



- 8.2 However, no list of certified farms is published either on the RSPCA or Freedom Foods websites and both have declined to provide a full list of certified fish-farms.
- 8.3 Despite this, sporadically, it has been possible to identify which farms are certified.
- 8.4 For example, fish-farm inspection reports by the Fish Health Inspectorate (part of Marine Scotland) obtained pursuant to freedom of information law, showed that Wester Ross Fisheries Limited farms in Two Brooms were certified by Freedom Food.
- 8.5 In May 2012, RSPCA was made aware by S&TA of the poor record of seabed pollution at Wester Ross Fisheries Limited farms in Two Brooms, revealed by information obtained from the Fish Health Inspectorate and from the Scottish Environment Protection Agency (SEPA)<sup>19</sup>, including sea-lice numbers on farmed fish above the Code of Good Practice thresholds at all three of its farms at Corry, Ardair and Ardesse and poor benthic reports from SEPA, particularly in relation to the Corry fish-farm. It is not clear what if any action was taken by RSPCA.
- 8.6 Also in May 2012, Freedom Food supplied to an individual opposing fish farm expansion in the Western Isles, a list of farms certified by Freedom Food and operated by The Scottish Salmon Company.
- 8.7 Subsequent to this 'partial' publication, the S&TA requested from both Freedom Food and the RSPCA a list of all certified fish-farms, with the express aim to ensure fairness across all fish-farmers, before the environmental impact of those farms known to be certified was examined as against the various S&TA reports already published<sup>20</sup>.
- 8.8 Unfortunately, Freedom Food again declined to provide a list of certified farms stating that *"specific details relating to our members is deemed as confidential within our membership agreement and we are only permitted to release such information if it is deemed to be in the member's interest to do so. Under the circumstances I believe it would be inappropriate for Freedom Food to furnish you with the information you have requested"*<sup>21</sup>.
- 8.9 The S&TA has analysed the fish-farms named on the list referred to above as against information obtained by S&TA under freedom of information from SEPA, Marine Scotland Science, the Fish Health Inspectorate or other public bodies.
- 8.10 Freedom Food has certified the following sites operated by The Scottish Salmon Company<sup>22</sup>. Under each farm is noted relevant failings highlighted by information obtained by the S&TA from the Fish Health Inspectorate of Marine Scotland or from SEPA.

### **Inch Kenneth**

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<sup>19</sup> Letter from Guy Linley-Adams, Solicitor to S&TA, to RSPCA and Freedom Foods, 21<sup>st</sup> November 2011.

<sup>20</sup> Letter from Guy Linley-Adams, Solicitor to S&TA, to Leigh Grant, Freedom Food Limited and John Avizienius, RSPCA, 24<sup>th</sup> August 2012

<sup>21</sup> Email 17<sup>th</sup> September 2012 from Leigh Grant, Chief Executive, Freedom Foods Limited to Guy Linley-Adams, Solicitor to the S&TA

<sup>22</sup> Email from Gregory Brabon, Freedom Food 27<sup>th</sup> June 2012

Unsatisfactory benthic pollution reports by SEPA 26/03/2009 and 22/02/2011

**Tuath**

Borderline benthic pollution report by SEPA, 22/09/2011

**Strome**

Unsatisfactory benthic pollution reports by SEPA 07/01/2010

Slice benthic residue data not reported on time to SEPA 2009

**Eughlam**

No relevant information

**Trilleachan Mor**

Sea lice numbers over CoGP thresholds for the period that records inspected FHI inspection, 25/05/2009 and 30/03/2011

Unsatisfactory benthic pollution reports by SEPA 13/01/2011

**Procrapool**

No relevant information

**Strondoir Bay**

Sea lice numbers over CoGP thresholds for the period that records inspected FHI inspection, 27/05/2009 and 15/03/2011, not recording lice in accordance with industry practice 15/03/2011

Slice residue sample failure of EQS at cages 28/01/2009

**Meall Mhor**

Sea lice numbers over CoGP thresholds for the period that records inspected FHI inspection, 27/05/09, not recording lice in accordance with industry practice 15/03/2011

Unsatisfactory benthic pollution reports by SEPA 16/02/2009 "marked deterioration in benthic conditions", 18/01/20211 "benthic conditions deteriorated since last survey"

Slice residue sample failure of EQS at 100m from cages 18/01/2011

**Gob A Bharra**

Unsatisfactory benthic pollution reports by SEPA 20/12/2010, failed two of the last three surveys

**Tullich**

No relevant information

**Russelburn**

No relevant information

**Barvas**

No relevant information

**Strone**

Not recording lice in accordance with industry practice 15/06/2010,

Unsatisfactory benthic pollution reports by SEPA 22/02/2010 ("site significantly overstocked by 63%")

**Gousam**

Unsatisfactory benthic pollution reports by SEPA 22/09/2010  
Slice residue sample failure of EQS at cages 22/05/2008

**Vuia Beag**

Borderline benthic pollution reports by SEPA 27/09/2010  
Slice residue sample failure of EQS at cages and at 100m from cages 22/05/2008

- 8.11 The list also gives fish-farm sites which had applied for Freedom Food certification but were, at the time, waiting for assessment:

**Tarbert South**

No relevant information

**Langavat**

No relevant information

**Rubha Stillaig**

Sea lice numbers over CoGP thresholds for the period that records inspected FHI inspection, 25/06/2009. "Polar circles [cages] buckled, could implode".  
Unsatisfactory benthic pollution reports by SEPA 19/05/2011

**Amhuinnsuidhe**

No relevant information

**Geocrab**

No relevant information

**Huamavat**

No relevant information

**Glenan Bay**

Sea lice numbers over CoGP thresholds for the period that records inspected FHI inspection, 26/05/2009.

Unsatisfactory benthic pollution reports by SEPA 4/2/09

"Degradation in benthic conditions in last two production cycles. Biomass appears to be unsustainable at this site", SEPA, 29/03/2011

## **Conclusions and Recommendations**

- 9.1 Although the focus of the RSPCA / Freedom Food certification scheme is the welfare of the farmed fish, the standards applied do also relate to wider environmental impact, including to wild salmonids, although there appears to be nothing within the objects of Freedom Food Limited that empowers it to become involved in matters relating to wider environmental impact or the impact upon wild salmonids, as opposed to the welfare of farmed fish.
- 9.2 The S&TA is clear that the wider environmental standards applied as part of the Freedom Food certification scheme are not rigorous enough and generally reflect minimum legal requirements only.
- 9.3 Despite the refusal of RSPCA and Freedom Food to publish a list of those certified fish-farms, from an analysis of those fish-farms that the S&TA can identify as being certified by Freedom Food, there are serious questions to be asked over their wider environmental impact.
- 9.4 As such, the RSPCA should urgently review the Freedom Food certification as applied to salmonid fish-farms.
- 9.5 The RSPCA should consider dropping all environmental standards from Freedom Food certification, concentrating solely on animal welfare issues relating to the farmed fish, with the corollary that no certified farm or retail market outlet may make environmental claims based on Freedom Food certification or use the certification in such a way as to mislead consumers that the certification implies good environmental performance.
- 9.6 Alternatively, the RSPCA must dramatically improve and make far more stringent those standards in the Freedom Food scheme concerning wider environmental impact and impact on wild fish, in consultation with wild fish conservation bodies.
- 9.7 The revised standards should include a requirement on all fish-farms to demonstrate complete openness in relation to weekly farm-specific sea-lice data, publication of Environmental Impact Plans (required under EVI 1.1) and other environmental data, prior to any certification by Freedom Food.
- 9.8 RSPCA and Freedom Food should also publish all certification reports, reports of visits and audits made to both certified or applicant farms and any remedial actions required, in order to allow proper public scrutiny of Freedom Food certified farms and to ensure that the Freedom Food scheme itself enjoys public confidence.
- 9.9 In any event, the RSPCA and Freedom Food should immediately publish a full list of all fish-farms certified by Freedom Food.

