

Federal Trade Commission  
Bureau of Consumer Protection  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

28<sup>th</sup> January 2010

### **Complaint against ‘Norwegian Salmon’ for deceptive advertising – Farmed Not Wild Salmon**

Further to the advert in *Cooking Light* magazine<sup>i</sup> (see attached in Appendix 1), we would like to lodge a formal complaint against ‘Norwegian Salmon’ for breach of advertising standards and deceptive marketing. The offending advert (which appeared in the October 2009 issue) is seriously misleading to consumers and gives a false impression that ‘Norwegian Salmon’ is wild not farmed salmon. We believe that this advert constitutes a potential case of “unfair, deceptive, or fraudulent practices in the marketplace” and consequently warrants investigation by the Federal Trade Commission’s Bureau of Consumer Protection<sup>ii</sup>.

There is a fundamental difference – in both human health and environmental respects – between wild salmon and farmed salmon (specific details are provided below and more details are available upon request). Labelling laws can require that salmon is differentiated as ‘wild’ or ‘farmed’ (and that farmed salmon fed on feed with added artificial colorings/dyes display ‘Color Added’ labels). Hence we argue that the advertiser – the Norwegian Seafood Export Council - ought to have made readers aware of the vital distinction between farmed and wild salmon. We ask that the advertiser states publicly how much ‘Norwegian Salmon’ is farmed in cages not caught in the wild.

This is not the first time farmed salmon has been subject to a complaint to the Federal Trade Commission - you should be aware of a Petition for Initiation of Enforcement Proceedings Against Salmon of the Americas for Deceptive Practices Under Section 5 of the Federal Trade Commission Act filed in 2006 by National Environmental Trust<sup>iii</sup>.

Only this week Target took a stand against farmed salmon in particular by announcing it would stop selling farmed salmon in favour of wild caught Alaskan salmon<sup>iv</sup>. The Norwegian state broadcaster *NRK* reported on this issue today under the headline “Amerikanere vraker norsk laks - Amerikansk supermarkedkjede kaster ut norsk oppdrettslaks og erstatter den med villaks fra Alaska”<sup>v</sup> (“Americans rejects Norwegian salmon - American supermarket chain throws out Norwegian farmed salmon and replaces it with wild salmon from Alaska”).

### **Misleading Language**

The advert deliberately and systematically uses the words “naturally”, “nature”, “pure” and “simple” to convey an image associated with wild salmon (and avoids explicit or even implicit reference to farmed salmon). The use of the word “fishing” and phrase “we prefer

fishing in fjords” clearly refers to wild caught fish. Together with the image of the fishing boat in the ‘Norge – Seafood from Norway’ logo the theme of the advert conjures up a false picture of salmon caught in the wild by fishing boats.



The phrase “years of swimming in cold, clear arctic waters” also adds to the misleading impression of a wild fish free to roam the open ocean rather than the reality of a factory farmed salmon kept in confined cages close to the coast for 18 months before slaughter. Nor are any Norwegian salmon farms (nor Norway itself for that matter) located within the internationally defined boundaries of the Arctic Ocean<sup>vi</sup> - hence Norwegian farmed salmon (except perhaps for the thousands which escape each year<sup>vii</sup>) do not spend any time - let alone “years” – “swimming in cold, clear arctic waters” as the advert explicitly states.



By contrast, Norwegian wild salmon (which are now threatened with extinction<sup>viii</sup>) do leave rivers in Norway and migrate to feed for several years in North Atlantic and Arctic waters.

The web-site referenced in the advert (<http://www.salmoninseconds.com/> - with the Norwegian Seafood Export Council listed at the bottom of the web-page as the copyright holder) repeats misleading language associated with wild salmon with phrases such as:

“Norwegian Salmon is a simple part of nature” and “Norway is a simple place that has a high respect for nature”<sup>ix</sup>

The ‘Norwegian Salmon’ You Tube video clip in the ‘Why Norwegian’ web-section repeats the imagery of fishing boats and highlights the phrases “Long Standing Fishing Traditions” and “Nature’s Health Source”.

Only brief mention to the fact that Norwegian salmon is farmed in cages is made in the phrase “Raised in a Pristine Environment”<sup>x</sup>.

The ‘Why Norwegian’ video clip also misleadingly uses footage of Chef Rick Moonen – a U.S.-based chef, proponent of wild salmon and advocate against farmed salmon. Chef Moonen, who is a co-signer to this complaint, refuses to serve farmed salmon in his Las Vegas restaurant RM Seafood<sup>xi</sup>, has campaigned against the labelling of farmed salmon as “organic”<sup>xii</sup> and is a well-known ‘Wild Salmon Supporter’<sup>xiii</sup>. His book “Fish – Without a Doubt”<sup>xiv</sup> – has a section on ‘Salmon’ pointing out the problems of salmon farming and advising readers to “seek out wild Pacific salmon”. Chef Moonen has now written to the Norwegian Seafood Export Council asking them to remove his image from their promotional material for Norwegian farmed salmon.

### **‘Norwegian Salmon’ and the Norwegian Seafood Export Council – farmed not wild salmon**

A closer examination of the Norwegian Seafood Export Council (whose name is not listed on the advert – but is listed at the bottom of the <http://www.salmoninseconds.com> web-page cited in the advert) reveals a little more about ‘Norwegian Salmon’.

The ‘Salmon in Seconds’ promotion with video clips (including the ‘Why Norwegian’ clip featuring Chef Rick Moonen) is prominently displayed on the front page of their web-site<sup>xv</sup>. However, the fact that probably 100% of ‘Norwegian Salmon’ exported in the U.S. market (and other global markets) is farmed not wild is hidden from public view.

The ‘Salmon’ section of the Norwegian Seafood Export Council’s web-site once again presents information on wild and farmed salmon and does not state explicitly that the overwhelming majority of ‘Norwegian Salmon’ is farmed<sup>xvi</sup>. It becomes clearer in the ‘Aquaculture’ section which states:

“Fish-farming has now developed into a vital and extensive industry. Norway is now one of the world’s biggest producers of Atlantic salmon, and we are also farming many other fish species, albeit on a smaller scale as natural resources are limited. Modern aquaculture, however, offers a way to produce fish and seafood in the quantities required. In this way, supply can be adjusted to fit demand. Which is why more and more often, farmed and reared fish are consumed instead of their fellow species members caught in the wild”<sup>xvii</sup>.

The web-site also states that:

“NSEC was created by the Ministry of Fisheries in 1991, and is a limited company, in which all of the shares are owned by the Ministry of Fisheries and Coastal Affairs. The main organisations in the industry make recommendations for appointments to the Board of the company. Its activities include marketing and PR, market information, market access, information and contingency”<sup>xviii</sup>.

In fact, the Norwegian Minister of Fisheries of Coastal Affairs – Lisbeth Berg-Hansen – is co-owner of a farming company and former head of the Norwegian salmon farming association<sup>xix</sup>.

How much of the “natural” and “pure” ‘Norwegian Salmon’ promoted by the Norwegian Seafood Export Council is farmed rather than wild salmon?

### **Farmed Salmon Is Not Natural – Artificial Colors, Pesticides and Antibiotics Added to Man-Made Feed**

To the uneducated reader and viewer, ‘Norwegian Salmon’ is clearly presented as caught naturally in the wild by fishing boats not farmed at high densities in cages (a single Norwegian salmon farm could contain one million farmed salmon and mortalities are significant due to diseases and parasites). Farmed salmon are fed an unnatural diet which can contain pesticides, artificial colorings, antibiotics and a man-made industrial diet of feed pellets sourced from fish oil and fish meal<sup>xx</sup> which has been shown to be contaminated with PCBs and other chemicals<sup>xxi</sup>.

Even the eagle-eyed viewer would be hard to spot the “Farmed” box ticked/marked in a blink-and-you-miss it frame (after 2 minutes, 7 seconds) in the ‘How to Purchase: In the Supermarket’ video promotion (cited in the *Cooking Light* advert)<sup>xxii</sup>. In the above video there is no reference to the fact that Norwegian farmed salmon contains artificial colorings such as Canthaxanthin (E161g) and Astaxanthin and are fed feed which has color added to ensure that farmed salmon are an appetising shade of red<sup>xxiii</sup>. Under U.S. labelling laws, supermarkets are required to display ‘Color Added’ labels to identify farmed salmon containing artificial colors<sup>xxiv</sup> – although not all supermarkets have abided by the law with various lawsuits on this issue<sup>xxv</sup>.

The ‘Norwegian Salmon’ video even asks consumers to look out for Norwegian salmon’s “bright orange color” as a sign of freshness. However, the advertisers patently fail to explain the industrial origin of Norwegian salmon’s fake tan which is assisted by the use of a ‘SalmonFan’ which allows salmon farmers to choose how bright a color their salmon will be<sup>xxvi</sup>.



**Hoffman Laroche's SalmoFan and buyer's guide**

Norwegian salmon farmers also can add various pesticides to salmon feed<sup>xxvii</sup> as well as antibiotics<sup>xxviii</sup>. Only wild salmon can be truly described as “natural” and part of “nature” – farmed salmon is a man-made product with a list of industrial and manufactured ingredients.

### **Differences Between Wild and Farmed Salmon**

There is a fundamental difference between wild and farmed salmon – differences which have human health and environmental implications<sup>xxix</sup>. Scientific research co-authored by Norwegian scientists at the National Institute of Nutrition and Seafood Research (NIFES) revealed recently that due to contamination with persistent organic pollutants (POPs): “Male rats fed fish oil from farmed salmon developed insulin resistance, obesity and related health issues”<sup>xxx</sup>.

Photo from *Environmental Health News* (14<sup>th</sup> January 2010):



NatalieMaynor/flickr:

Male rats fed fish oil from farmed salmon developed insulin resistance, obesity and related health issues.

The contamination of Norwegian farmed salmon with POPs such as dioxins and PCBs has been well documented. In 2004, U.S. scientists reported in the journal *Science* that “concentrations of these contaminants are significantly higher in farmed salmon than in wild” and that “European-raised salmon have significantly greater contaminant loads than those raised in North and South America”<sup>xxxii</sup>. Other research authored by U.S. scientists published in 2005 also revealed higher levels of PCBs, dioxins, dioxins, toxaphene and dieldrin in farmed salmon compared to wild salmon – with Norwegian farmed salmon containing some of the highest contamination levels<sup>xxxiii</sup>.

In 2006, U.S. scientists concluded in a paper on PCB and organochlorine pesticide contamination of farmed salmon (including salmon farmed in Norway) that: “The importance of labeling salmon as farmed and identifying the region of origin has been emphasized as a means to helping the consumer avoid unnecessary exposure to highly contaminated fish”<sup>xxxiii</sup>.

Further health information detailing how “Farmed Salmon Is Neither Safe Nor Pure” and “Farmed Salmon Contains Contaminants and Its Consumption Is Harmful for a Developing Fetus” is presented in the Petition for Initiation of Enforcement Proceedings Against Salmon

of the Americas for Deceptive Practices Under Section 5 of the Federal Trade Commission Act filed in 2006 by National Environmental Trust<sup>xxxiv</sup>.

## **Environmental Impacts of Norwegian Salmon Farming**

Environmental impacts of salmon farming are well known and were outlined in detail, for example, by over 40 leading organizations within the organic, ocean conservation, animal welfare and food safety communities in a submission in 2007 to the U.S. National Organic Standards Board<sup>xxxv</sup>. Environmental concerns surrounding Norwegian farmed salmon in particular include escapes, sea lice, infectious diseases and feed issues<sup>xxxvi</sup>.

The Norwegian salmon farming industry is currently in crisis with the Norwegian press reporting extensively on sea lice problems, chemical resistance, escapes from salmon farms and infectious diseases decimating the industry<sup>xxxvii</sup> (further information is available upon request). The respected Norwegian financial newspaper *Dagens Naringsliv* reported last month under the headline “Barack Obama warned against Norwegian salmon”<sup>xxxviii</sup> that in a letter to letter to the U.S. Ambassador to Norway, Barry B. White, President Obama had been “urged to take up the issue of market access for farmed salmon in the U.S. market”. The Norwegian government’s Directorate for Nature Management also called for a drastic reduction in salmon farming production<sup>xxxix</sup>.

Only this week the Norwegian media reported on Target’s decision to stop selling farmed salmon products<sup>xl</sup>. Greenpeace US explained:

“Target will replace farmed salmon with wild Alaskan salmon, a relatively healthy and sustainable product..... Target announced that the reason they are discontinuing the sale of farmed salmon is because of the significant environmental degradation it causes”<sup>xli</sup>.

The deteriorating situation has been reported recently in the English-speaking media with articles headed “Lice Alert for Norwegian Salmon” published in *AFP*<sup>xlii</sup>, *The China Post*<sup>xliii</sup>, *The Irish Times*<sup>xliv</sup> and *The Independent* (UK)<sup>xlv</sup>. *Vital Choices* magazine reported that “Norway’s Nature Cops Call for Salmon Farm Cutbacks”<sup>xlvi</sup>. Fishing blogs reported on the problems with the Norwegian salmon farming sector in headlines such as “They Poison Our Fjords”<sup>xlvii</sup> and “The Fjords are Broken”<sup>xlviii</sup>.

The crisis in the Norwegian salmon farming industry led this month to the Norwegian Salmon Association to issue a “Wild Salmon and Sea Trout Alert”<sup>xlix</sup> calling for a boycott of Norwegian farmed salmon.



And in November 2009, WWF Norway issued a warning that they would 'red-list' Norwegian farmed salmon due to sea lice, disease and escape problems<sup>1</sup>.

In the U.S., the Monterey Bay Aquarium's 'Seafood Watch' guide already distinguishes between wild salmon and farmed salmon – listing farmed salmon as 'red' (avoid) and wild salmon as 'green' (best choice)<sup>ii</sup>. In a very recent development, *Scientific American* reported that the Monterey Bay Aquarium ranked farmed salmon grown in land-based closed containers in Washington State as 'green' (best choice)<sup>iii</sup>. However, we understand that 99.9% of Norwegian salmon is farmed in open net cages and is therefore open to escapes, sea lice, infectious diseases, chemical use and untreated waste discharges.

### **Making the Difference**

In view of the fundamental differences between farmed and wild salmon, it is therefore not surprising that 'Norwegian Salmon' is reluctant to divulge the provenance of the product which they are promoting in the U.S. marketplace. A survey by *The New York Times* in 2005, for example, revealed that farmed salmon was being mislabelled and sold in the U.S. as 'wild'<sup>liii</sup>. *Consumer Reports* also published details in 2006 of a "Salmon Scam" where farmed salmon was wrongly labelled as wild salmon – advising consumers that "Choosing wild salmon rather than farmed can minimize exposure to pollutants"<sup>liv</sup>.

The Monterey Bay Aquarium publishes advice to consumers on farmed salmon including the following: "It's important to ask whether the salmon you're buying is wild or farmed"<sup>lv</sup>. The

Environmental Defense Fund ranks farmed Atlantic salmon as the “Eco-Worst Choice” with a “Health Alert” due to “elevated levels of PCBs”<sup>lvi</sup>.

The need to make the difference between Norwegian farmed salmon and wild salmon alternatives in the U.S. marketplace is increasing. Since the decline of the Chilean salmon farming industry due to disease and parasite problems<sup>lvii</sup> and associated falls in exports of Chilean farmed salmon to the U.S. market<sup>lviii</sup>, the Norwegian Seafood Export Council have targeted the U.S. market as a place to expand<sup>lix</sup>. *Seafood Source* reported in November 2009 that: “The council has ramped up its farmed salmon marketing efforts in the United States this year, including opening a U.S. office in New York”<sup>lx</sup>. And *Seafood Business* magazine reported last month that:

“To offset the production shortfall in Chile, which is still in the process of ridding its farms of infectious salmon anemia (ISA), Norway has ramped up its salmon output sharply this year. The country’s total salmon exports reached a record 83,536 metric tons (round weight) in October, up 24 percent from October 2008, according to the Norwegian Seafood Export Council. Though only a small percentage of Norway’s salmon exports enter the U.S. market, it’s obvious that more chefs and retailers are turning to Norwegian product, as well as Scottish product, in the wake of Chile’s ISA woes. In October alone, Norwegian salmon exports to the United States were up a whopping 684 percent for fresh fillets and 403 percent for frozen fillets, according to the council”<sup>lxi</sup>.

We therefore challenge the advertisers to come clean and reveal how much ‘Norwegian Salmon’ exported into the U.S. market is wild salmon and how much is farmed salmon. We would be surprised if the answer was not 100% farmed salmon. If so, we urge the authorities to take the appropriate measures to ensure that the public are not deceived in the future. We ask that a clarification and apology is provided to readers of *Cooking Light* magazine. We also ask you to investigate other media publications where similar adverts have appeared. The Norwegian Seafood Export Council recently opened up a new office in Boston and will be further promoting ‘Norwegian Salmon’ at the International Boston Seafood Show in March<sup>lxii</sup>.

In conclusion, the lack of transparency and lack of due diligence by the advertiser to disclose the true nature of farmed ‘Norwegian Salmon’ is cause for concern both to those consumers who make purchasing decisions based upon health concerns and those who factor in environmental impacts. We therefore ask that appropriate action is taken to ensure that ‘Norwegian Salmon’ is not deceptively advertised in the U.S. marketplace and enforce truth-in-advertising laws. We urge you to ensure that consumers can make informed choices about the salmon that they buy – and that ‘Norwegian Salmon’ is properly advertised by the Norwegian Seafood Export Council as farmed.

Yours sincerely,

Rick Moonen, Chef at RM Seafood, Las Vegas

Marianne Cufone, Director, Fish Program, Food & Water Watch

George Kimbrell, Staff Attorney, The International Center For Technology Assessment & The Center For Food Safety

Anne Mosness, Go Wild Campaign

Bartlett Naylor, Capital Strategies Ltd.

Don Staniford, Global Coordinator, The Pure Salmon Campaign

Appendix 1: Advert in *Cooking Light* magazine (October 2009)



### **Norwegian Salmon 1-2-3**

*Super fast. Super easy.*

1. Rub Norwegian salmon fillets with lemon juice + extra virgin olive oil + salt, pepper and dill to taste.
2. Grill or broil 3 min. per side.
3. Serve over your favorite pasta or vegetable.

## Naturally easy.

In Norway, we don't like to complicate things. We walk where others might drive. We prefer fishing in fjords to fishing for answers. And when we cook, we let nature do most of the work.

Norwegian salmon develops its pure flavor from years of swimming in cold, clear arctic waters. Yet it can be prepared in just seconds.

Learn how at [salmoninseconds.com](http://salmoninseconds.com)  
877.365.Salmon

Norwegian Salmon. Surprisingly Simple.



<sup>i</sup> <http://www.cookinglight.com/magazine/>

<sup>ii</sup> <http://www.ftc.gov/bcp/about.shtm>

<sup>iii</sup> [http://www.puresalmon.org/pdfs/FTC\\_complaint\\_letter.pdf](http://www.puresalmon.org/pdfs/FTC_complaint_letter.pdf)

<sup>iv</sup> <http://www.washingtonpost.com/wp-dyn/content/article/2010/01/26/AR2010012602919.html>

<http://www.ft.com/cms/s/0/9ee49c3e-0aac-11df-b35f-00144feabdc0.html>

[http://www.latimes.com/business/la-fi-salmon27-2010jan27\\_0,582811.story](http://www.latimes.com/business/la-fi-salmon27-2010jan27_0,582811.story)

[http://www.nytimes.com/aponline/2010/01/26/business/AP-US-Target-Farmed-Salmon.html?\\_r=2](http://www.nytimes.com/aponline/2010/01/26/business/AP-US-Target-Farmed-Salmon.html?_r=2)

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- v <http://www.nrk.no/nyheter/distrikt/nordland/1.6965284>
- vi <http://geology.com/world/arctic-ocean-map.gif>  
[http://en.wikipedia.org/wiki/Arctic\\_Ocean](http://en.wikipedia.org/wiki/Arctic_Ocean)
- vii [http://www.bellona.org/aquaculture/artikler/escapes\\_number](http://www.bellona.org/aquaculture/artikler/escapes_number)
- viii [http://alexandramorton.typepad.com/alexandra\\_morton/2009/12/sea-lice-are-out-of-control-in-norway.html](http://alexandramorton.typepad.com/alexandra_morton/2009/12/sea-lice-are-out-of-control-in-norway.html)
- ix <http://www.salmoninseconds.com/WhyNorwegian.aspx>
- x <http://www.salmoninseconds.com/WhyNorwegian.aspx>
- xi <http://www.chow.com/stories/11173>
- xii [http://www.puresalmon.org/pr\\_03-26-07.html](http://www.puresalmon.org/pr_03-26-07.html)
- xiii <http://www.salmonsupporters.com/supporters.php>
- xiv [http://books.google.com/books?id=BfVNW2CuVEC&pg=PA66&lpg=PA66&dq=Rick+Moonen+fish+without+a+doubt+farmed+salmon&source=bl&ots=0S8JhSnQQ&sig=HnRpGyIaXqMPRzWR1kV\\_VAEEA90&hl=en&ei=7PZS55TWFYeJ4Qbyi8yQCQ&sa=X&oi=book\\_result&ct=result&resnum=1&ved=OCACQ6AEwAA#v=onepage&q=&f=false](http://books.google.com/books?id=BfVNW2CuVEC&pg=PA66&lpg=PA66&dq=Rick+Moonen+fish+without+a+doubt+farmed+salmon&source=bl&ots=0S8JhSnQQ&sig=HnRpGyIaXqMPRzWR1kV_VAEEA90&hl=en&ei=7PZS55TWFYeJ4Qbyi8yQCQ&sa=X&oi=book_result&ct=result&resnum=1&ved=OCACQ6AEwAA#v=onepage&q=&f=false)
- xv <http://www.seafoodfromnorway.com/>
- xvi <http://www.seafoodfromnorway.com/page?id=103&key=2499>
- xvii <http://www.seafoodfromnorway.com/page?id=100&key=14379>
- xviii <http://www.seafoodfromnorway.com/Fishlovers/About+NSEC>
- xix [http://newsletter.vitalchoice.com/e\\_article001634386.cfm?x=b11,0,w](http://newsletter.vitalchoice.com/e_article001634386.cfm?x=b11,0,w)
- xx [http://www.bellona.org/aquaculture/artikler/Feed\\_ingredients](http://www.bellona.org/aquaculture/artikler/Feed_ingredients)  
[http://www.bellona.org/aquaculture/tema\\_aquaculture/Feed\\_resources](http://www.bellona.org/aquaculture/tema_aquaculture/Feed_resources)
- xxi <http://pubs.acs.org/doi/abs/10.1021/es048023r>  
<http://www.sciencemag.org/cgi/content/abstract/303/5655/226>  
<http://www.ewg.org/reports/farmedpcbs>
- xxii <http://www.salmoninseconds.com/HowToPurchase.aspx>
- xxiii [http://www.bellona.org/aquaculture/artikler/Dyes\\_in\\_salmon](http://www.bellona.org/aquaculture/artikler/Dyes_in_salmon)
- xxiv [http://writ.news.findlaw.com/commentary/20080218\\_byrne.html](http://writ.news.findlaw.com/commentary/20080218_byrne.html)  
[http://www.iser.uaa.alaska.edu/Publications/greatsalmonrun/SalmonReport\\_Ch\\_17.pdf](http://www.iser.uaa.alaska.edu/Publications/greatsalmonrun/SalmonReport_Ch_17.pdf)
- xxv [http://newsletter.vitalchoice.com/e\\_article001320312.cfm?x=b9bTHlf,b63IMhyt,w](http://newsletter.vitalchoice.com/e_article001320312.cfm?x=b9bTHlf,b63IMhyt,w)  
[http://www.seattlepi.com/local/118986\\_salmon24.html](http://www.seattlepi.com/local/118986_salmon24.html)  
<http://www.edwardtuft.com/files/salmofan.html>  
<http://www.courtinfo.ca.gov/opinions/archive/S147171.PDF>
- xxvi [http://www.motherlindas.com/is\\_something\\_fishy\\_going\\_on.htm](http://www.motherlindas.com/is_something_fishy_going_on.htm)
- xxvii [http://www.bellona.org/aquaculture/artikler/Salmon\\_lice\\_pharmaceuticals](http://www.bellona.org/aquaculture/artikler/Salmon_lice_pharmaceuticals)
- xxviii <http://www.bellona.org/aquaculture/artikler/Antibiotics>
- xxix <http://www.farmedanddangerous.org/uploads/File/Reports/SOTAFinal.pdf>
- xxx <http://www.environmentalhealthnews.org/ehs/news/science/pops-lead-to-insulin-resistance-in-rats/>  
<http://ehp.niehs.nih.gov/members/2009/0901321/0901321.pdf>
- xxxi <http://www.sciencemag.org/cgi/content/abstract/303/5655/226>
- xxxii <http://pubs.acs.org/doi/abs/10.1021/es050898y>
- xxxiii [http://www.puresalmon.org/pdfs/organochlorines\\_alaskan\\_salmon.pdf](http://www.puresalmon.org/pdfs/organochlorines_alaskan_salmon.pdf)
- xxxiv [http://www.puresalmon.org/pdfs/FTC\\_complaint\\_letter.pdf](http://www.puresalmon.org/pdfs/FTC_complaint_letter.pdf)  
[http://www.puresalmon.org/pr\\_02-16-07.html](http://www.puresalmon.org/pr_02-16-07.html)
- xxxv <http://www.puresalmon.org/pdfs/nosb-letter.pdf>
- xxxvi <http://www.bellona.org/aquaculture/index.html/>  
<http://www.fisheries.no/aquaculture/Sustainability/>
- xxxvii [http://alexandramorton.typepad.com/alexandra\\_morton/2010/01/calls-for-norwegian-minister-of-fisheries-to-resign-over-fish-farms.html](http://alexandramorton.typepad.com/alexandra_morton/2010/01/calls-for-norwegian-minister-of-fisheries-to-resign-over-fish-farms.html)  
[http://newsletter.vitalchoice.com/e\\_article001634386.cfm?x=b11,0,w](http://newsletter.vitalchoice.com/e_article001634386.cfm?x=b11,0,w)  
<http://www.dn.no/forsiden/naringsliv/article1794427.ece>  
<http://e24.no/boers-og-finans/article3461981.ece>  
[http://www.njff.no/portal/page/portal/njff/nyhet?element\\_id=60085753&displaypage=TRUE](http://www.njff.no/portal/page/portal/njff/nyhet?element_id=60085753&displaypage=TRUE)
- xxxviii <http://www.dn.no/forsiden/politikk/Samfunn/article1798689.ece>
- xxxix <http://www.bt.no/nyheter/lokalt/Varslar-fare-for-kystkatastrofe-993137.html>

- 
- <http://www.dirnat.no/content.ap?thisId=500039402&language=0>
- xi <http://www.nationen.no/Utenriks/article4827708.ece>
- xii <http://www.greenpeace.org/usa/news/target-discontinues-farmed-salmon>
- xiii <http://www.google.com/hostednews/afp/article/ALeqM5ggIjQHxhF5VrVO8xzLIpszxm4lg>
- xiii <http://www.chinapost.com.tw/life/environment/2009/12/28/238317/Lice-causing.htm>
- xiv <http://www.irishtimes.com/newspaper/ireland/2009/1228/1224261298224.html>
- xiv <http://www.independent.co.uk/environment/lice-alert-for-norwegian-salmon-1850385.html>
- xvi [http://newsletter.vitalchoice.com/e\\_article001634386.cfm?x=b11,0,w](http://newsletter.vitalchoice.com/e_article001634386.cfm?x=b11,0,w)
- xvii <http://www.fishyfolk.com/2009/12/23/they-poison-our-fjord/>
- xviii <http://www.fishyfolk.com/2009/12/15/the-fjords-are-broken/>
- xlix <http://norwegian-salmon.com/salmon/extended-en.php?recID=269>
- i [http://www.wwf.no/bibliotek/nyheter\\_fakta/?27540](http://www.wwf.no/bibliotek/nyheter_fakta/?27540)
- ii [http://www.montereybayaquarium.org/cr/SeafoodWatch/web/sfw\\_factsheet.aspx?gid=17](http://www.montereybayaquarium.org/cr/SeafoodWatch/web/sfw_factsheet.aspx?gid=17)
- iii <http://www.scientificamerican.com/article.cfm?id=coho-salmon-farming>
- iii <http://www.nytimes.com/2005/04/10/dining/10salmon.html>
- liv [http://www.consumerreports.org/cro/cu-press-room/pressroom/archive/2006/08/eng0608sal\\_ov.htm](http://www.consumerreports.org/cro/cu-press-room/pressroom/archive/2006/08/eng0608sal_ov.htm)
- lv [http://www.montereybayaquarium.org/cr/SeafoodWatch/web/sfw\\_factsheet.aspx?fid=133](http://www.montereybayaquarium.org/cr/SeafoodWatch/web/sfw_factsheet.aspx?fid=133)
- lvi <http://www.edf.org/page.cfm?tagID=15802>
- lvii <http://www.nytimes.com/2008/03/27/world/americas/27salmon.html>
- lviii <http://www.bloomberg.com/apps/news?pid=20601205&sid=adM92LUeGk9A>
- lix <http://www.seafoodfromnorway.com/News/News/View+media+article?key=48698>
- lx <http://www.seafoodsource.com/newsarticledetail.aspx?id=4294985303>
- lxi <http://www.seafoodbusiness.com/index.asp?ItemID=4251&rcid=199&pcid=198&cid=199>
- lxii <http://www.bostonseafood.com/10/public/DBCExhibitorList.aspx?letter=>