

## Salmon farming in Scotland

Dear Convener and members of the Rural Affairs and Islands Committee,

A whistleblower with first-hand knowledge of Bakkafrost has contacted the Green Britain Foundation with a simple warning: the publicly reported “mortality” figures for salmon farming do not capture the true scale of deaths, because mass culls are kept out of sight.

This is not a technical detail. It goes to the heart of whether Parliament and the public are being told the truth about animal welfare on salmon farms.

Culling involves the deliberate killing of very large numbers of fish, yet those numbers are not captured in the public mortality record. The effect is predictable: companies can point to official mortality totals while the biggest total of all, mass killing, sits in private logs.

We have received information from within Bakkafrost that culls are recorded in detail on internal farm management systems, but there is no routine requirement to report those cull totals publicly or to regulators in the way mortality is reported. The result is that a crop can show high “mortality” in the published record, and then the remaining fish can be killed and disappear into a separate internal category. That is not a technicality. It is the difference between partial visibility and the full truth.

The public datasets already hint at the scale. The Fish Health Inspectorate mortality spreadsheet includes repeated references to “remaining stock being culled”, while the cull totals are not shown as part of the mortality figures. One entry gives a rare glimpse of what this means: “Weekly mortality: 180,891 (21%) – The remaining fish have been culled to prevent spread of the bacteria”. When culling is the outcome, the number that matters is the full number killed, not just the deaths recorded before the decision to wipe out what remains.

FOI responses provide only limited information, but even so they show a single week where [1.3 million fish](#) were culled at Applecross. Meanwhile, culling is material enough for Bakkafrost to disclose its costs to shareholders. In a recent trading update the company referenced culling costs at its [Coul Doran](#) hatchery. Shareholders are told. The public and officials are kept in the dark.

We have also been pointed to a straightforward way to close this loophole: publish crop by crop yield from ova intake through to transfers off site, alongside mortality and culls. If the public can see what came in, what went out, and what died or was

killed, then missing fish cannot be hidden behind accounting categories. At present, only the companies have that complete picture.

We have also been told that some losses can be masked through the use of “accountabilities” rather than being recorded in a way that triggers external visibility. We are not asking the Committee to adjudicate individual cases. We are asking you to close a loophole: require standardised publication of mortality, culls and any other stock adjustments, with clear definitions and audit, so the same losses cannot be reclassified out of sight.

There is a further public interest point. Bakkafrost’s freshwater operations have received substantial public support justified in welfare terms. In December 2021 Applecross received a £3m grant from Highlands and Islands Enterprise and a £2m grant from Marine Scotland, with Highlands and Islands Enterprise stating: “This project will [improve fish welfare](#)”. In July 2025 a further £630,290 was awarded by Highlands and Islands Enterprise. If public agencies are funding “welfare improvement”, it is not acceptable that the most consequential welfare outcome sits in private logs.

We are clear about where we stand. Open net salmon farming has no social licence in the long term and we will continue to advocate for its phase out. But that will not happen overnight. While Scotland still permits the industry to operate, the least the public is owed is the truth, in full, every time.

We therefore ask the Committee to recommend one immediate reform: mandatory publication of cull numbers at site level, alongside mortality, within a fixed reporting timeframe and with independent audit. If Ministers and regulators are confident in the industry’s claims, they should have no objection to the full dataset being visible.

Kind regards,

Rupert Evelyn  
Green Britain Foundation