

Wednesday 4th March 2026

Dear Members of the Rural Affairs and Islands Committee,

I write following the Committee's recent session on 25th February, in which regulators and industry were invited to assess progress made against the recommendations of the REC Committee's 2018 report and this Committee's 2025 report. My team and I are grateful for the Committee's continued scrutiny of this sector and wish to offer, respectfully, our assessment of what that session revealed and, most importantly, what it did not.

1. Incomplete mortality data: a “burden” to provide?

The Committee has previously recommended the publication of comprehensive, mandatory mortality data. During the recent session, Ben Hadfield of Salmon Scotland acknowledged that companies hold this data in full, yet was unable to explain clearly why exactly this would be a “burden” to share publicly. His characterisation that disclosing it is “*never enough for animal welfare charities or environmental activist groups*” misframes the matter. As you know, the request did not originate with us, it originated with the REC Committee nearly a decade ago.

Ben Hadfield also added that the industry, when asked whether it will simply publish the data it holds, considers: “*At what point is this beneficial?*”. Without complete mortality data, one of the Committee's stated ambitions - namely, to identify and support 'persistently high mortality' sites - cannot be realised. Nor can the welfare of so-called ‘cleanerfish’, deployed in significant numbers on Scottish farms, be meaningfully assessed. Norway already requires this data as a matter of regulation - fish that are culled, die during the first six weeks at sea, die during transport, or fall before reporting thresholds are met - yet inexplicably Scotland does not require the same and is lagging behind. Until it does, any claim that welfare oversight is functioning as intended is not supportable, and attention on the industry will inevitably continue to be highly polarised.

2. Mortality figures

Over 12 million salmon died on Scottish farms in 2025, according to the industry's own figures. That is 1.5 million more than the 10.5 million deaths recorded in 2024, and more than three times the 3.8 million recorded in 2018 when the REC Committee first set out its recommendations. We would ask the Committee to consider that if these numbers do not constitute the evidence base for urgent action, what would?

3. Sea lice

The Committee was told that sea lice levels are not a cause for concern, yet there were approximately 1,200 breaches of the Code of Good Practice (CoGP) in 2025, with close to one in four active farms in breach of its provisions. If that level of non-compliance does not constitute a regulatory concern, the Committee should ask whether the CoGP framework, and the regulator's interpretation of it, remains fit for purpose.

4. Impartiality

We wish to address directly the claim, made in evidence by Ben Hadfield, that animal advocacy organisations (presumably including Animal Equality) command financial resources of \$250 million with which to campaign against salmon farming. This is false, as our published Charity Commission accounts make clear; Animal Equality UK operates on a fraction of that figure, with an annual income of approximately £500,000 to advocate not only for farmed fish but also farmed terrestrial animals. We would ask the Committee not to allow such false assertions to distort its deliberations.

The question before the Committee is not whether you agree with Animal Equality's ultimate objectives - you may not, and that is entirely legitimate. The question is whether the specific, measurable recommendations made by the REC Committee in 2018, and reinforced by this Committee in 2025, have been met. Our approach has always been evidence-led: data, published science, and documented footage. We would respectfully ask the Committee to hold itself to the same standard: evidence-based, neutral assessment against its own benchmarks, rather than feeling any obligation to take sides between industry and civil society.

5. Complaints to APHA

We wish to address the suggestion, raised during the session, that the increase in complaints received by APHA may be attributable to “*vexatious*” submissions from NGOs rather than reflecting genuine public concern. We would ask the Committee to treat that characterisation with considerable caution since, as Dr Amy Jennings of APHA acknowledged, it does not serve anyone to seek to delegitimise the sources of that scrutiny rather than engage with its substance. Every complaint submitted by Animal Equality to APHA has been grounded in documented filmed evidence. We would ask the Committee not this unjustified framing to colour its assessment.

6. Enforcement

We acknowledge the point made during the session that high complaint numbers alongside low prosecution rates do not, of themselves, demonstrate enforcement failure. That is a fair observation, however, two points from the same session warrant attention:

Firstly, APHA acknowledged that when inspectors attend farms, they sometimes find those sites to be fallow. Secondly, a significant proportion of inspections are conducted remotely. We ask the Committee to satisfy itself that the current inspection model is genuinely capable of identifying and preventing harm.

7. Community benefit

Considerable weight was placed by Ben Hadfield in evidence on the economic benefits salmon farming brings to rural and island communities. We do not dismiss that consideration.

However, the Committee may wish to consider the documented safety record of the industry for its own workforce. Public records reveal more than 100 reported incidents of serious injury among workers in Scottish salmon farming operations, including degloving injuries, fractures, broken bones, and at least one fatality. It has also been reported that Mowi has declined to engage with the relevant trade union on these matters. A sector that presents itself as a community asset cannot reasonably ask to be assessed solely on that basis while the safety of its workforce remains an open and unresolved question.

The case for a moratorium on expansion

Given their natural interest in proving that progress has been made by their respective organisations, it is unsurprising that Salmon Scotland, Animal and Plant Health Agency (APHA), and the Fish Health Inspectorate (FHI) concluded progress had been achieved. We note that APHA's account of progress centred on slaughterhouse inspections and updated slaughter guidance. We welcome those developments and note that they arose directly from evidence submitted by Animal Equality, among others. However, neither featured among the Committee's recommendations. The Committee should consider whether they constitute the “*urgent progress*” it sought, or whether the goal-posts have quietly shifted.

On the other hand, the Scottish Animal Welfare Commission and Fisheries Management Scotland were both clear that sufficient progress has *not* been made.

The evidence before the Committee points to a sector in which the recommendations made in 2018 and repeated in 2025 have not been met with the urgency this Committee specified.

Mortality data remains inaccessible; recorded mortalities have tripled since 2018; sea lice Code of Good Practice compliance is unacceptable; the industry has delayed action on the new Sea Lice Framework through hundreds of appeals; APHA failed to conduct even one unannounced inspection in 2025; and worker safety concerns are unresolved. Public confidence, and the Scottish salmon industry's reputation, will no doubt continue to be undermined unless appropriate action is taken.

In that context, we strongly urge the Committee to recommend a moratorium on further expansion of salmon farming capacity in.

I remain available to provide further evidence or clarification that the Committee may require, and thank members for their continued attention to these matters.

Yours faithfully,

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