



Rural Affairs and Islands Committee: Scottish Salmon Inquiry

Submission by the Bakers Food and Allied Workers Union (BFAWU)

The Bakers Food and Allied Workers Union (BFAWU) represents workers across the food industry, including within the salmon industry in Scotland.

We appreciate that the work of the committee has, to a large extent, focused on fish health and welfare, the environmental challenges and the economic benefits, including the jobs created, from the salmon farming industry. These are of vital importance and we recognise the work of the committee in taking evidence on these issues.

However, we wish to bring the committee's attention to some of the issues we have found as trade union representatives of workers in the industry in relation to worker welfare.

Job creation is of course important, particularly in economically challenged rural areas of Scotland. But, the types of jobs and the health, safety and well-being of workers as well as the pay terms and conditions should also be considered. How workers are treated and the conditions they work in are vital too. You can't just stop and be thankful for the fact jobs are created, you must also think about what the working life is like for the workers in the industry.

This committee and indeed other parliamentary committees at Westminster and the respective Scottish and UK Governments have failed to properly address or even think about the experiences of workers in the salmon industry.

Health and Safety

Most notably this committee and others have failed to interrogate the industry on the health and safety of the salmon farming industry. We have been passed on data that shows a very worrying regularity and severity of accidents in the salmon industry.

We recently sent a briefing to this committee and to all MSPs showing how 139 accidents were reported to the Health and Safety Executive (HSE)¹ by salmon farming companies between

¹ These accidents are classified as needing to be reported through the Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR) Requirements, reported to the HSE. These figures do not include other accidents and illnesses that are not required to be reported to the HSE as per RIDDOR requirements.

2020 and March 2025 (this briefing is included in this submission). This is a very high proportion. Given that approximately 2500 people are employed directly in the industry this amounts to 5.56% of workers having experienced an accident in the 5 years outlined.

The regularity of RIDDOR incidents suggest that many salmon farms and processing plants are accident ridden, with dangerous incidents regularly taking place across the salmon industry. Broken neck and back injuries, amputations, and one death are the most serious issues reported. Fractures to different bones are the most commonly reported accident. Fractures listed are to fingers, ankles, upper and lower limbs; heel and foot fractures have also been reported.

One issue that was also reported was the inhalation of fish proteins, which one worker was hyper sensitive to. This does raise the question of what impact/harm this is causing workers over time. Particularly as we know that constant inhalation can lead to people developing asthma.

This issue of salmon asthma has seen regular studies abroad, most notably Norway, with firm evidence that bioaerosols distributed in salmon industry workplace environments can and do lead to workers developing asthma. In the UK there has been a dearth of such studies and it seems very much like this issue has gone under the radar.

Trying to find this issue being discussed or recognised, let alone any evidence and papers, in the pages of the Scottish government and its Aquaculture Industry Leadership Working Group or its 10 year strategic framework, or in the Griggs report, the website of the HSE and the inquiry conducted by this committee leads to a blank. There is no discussion at all, let alone, it seems, any advice to the industry to mitigate against the distribution of bioaerosols in order to limit and prevent their distribution in Scottish salmon industry workplaces.

Mowi Processing Plant

Last summer we published a report², based on worker testimony, that outlined a list of concerns about the health and safety of the workforce at the Mowi fish processing plant at Rosyth in Fife.

Strong concerns were expressed about the lack of toilets, time limited toilet breaks, workers having to get toilet cover before they go, inadequate canteen facilities including a lack of seating for workers often working 12 hour shifts, lack of mitigation to help workers working in cold working temperatures for long periods of time and manual handling practices that could be resulting in injuries from repetitive work were some of the concerns raised in the report.

Moreover, their sickness absence policy, which is deemed unfair and results in perverse incentives for sick workers going to work, was raised as a concerning issue. This is because the policy gives discretion to managers about whether a worker gets sick pay or not if they are off sick. This not only leaves workers in quandary, as to whether they get company sick pay or

² <https://www.bfawu.org/on-the-line-our-report-on-worker-treatment-and-conditions-at-mowi-rosyth/>

statutory sick pay but in addition they are also excluded from the Christmas bonus payment which is £250. Also, in some cases staff have sick pay withdrawn even if they are off work due to workplace accidents and injuries.

This report raised concerns that basic rights were not being applied at the Mowi Rosyth plant. No adult should be told when to go to the toilet, if they can go and how long they can go for. It is ridiculous and wrong but sadly this is the culture that this report has exposed.

If there was a functioning and proactive health and safety culture then many of the issues we have raised in the report would have been dealt with, the fact they haven't been demonstrates how unsatisfactory their approach is.

The fact is that unionised workplaces are healthier and safer workplaces - and Mowi needs to recognise our union to help improve theirs.

Trade Unions and the Salmon Industry

Our union, applying the Scottish government's principles expressed in the Fair Work Agenda, have sought meetings with the management at Mowi in order to constructively work with the company so that we can help drive improvements for our members and the wider workforce. In so doing we believe that this would ultimately also benefit the company. Each time we have done so they have rejected our approach.

This behavior stands in stark contrast to their engagement with trade unions in Norway and indeed their public proclamations that they willingly and constructively work with trade unions and deem themselves an ethical company in this regard. It also diverges from their work with trade unions in Norway; where they have a collective bargaining agreement in place, which has undoubtedly resulted in better pay, terms and conditions for Norwegian salmon industry workers.

We ask for the same approach here in Scotland. Scottish workers should be treated fairly and enjoy exactly the same terms as their Norwegian counterparts.

Mark McHugh, BFAWU Scottish Organiser

MSP Briefing - Health and Safety in the Salmon industry

The Bakers Food and Allied Workers Union has recently obtained data via a freedom of information request showing the number of accidents, classified as needing to be reported through the Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR) Requirements, reported to the Health and Safety Executive (HSE).

The data shows that there have been 139 accidents (mainly between 2020- March 2025). These figures do not include other accidents and illnesses that are not required to be reported to the HSE as per RIDDOR requirements.

The regularity of RIDDOR incidents suggest that many salmon farms and processing plants are accident ridden, with dangerous incidents regularly taking place across the salmon industry. Broken neck and back injuries, amputations, and one death are the most serious issues. Fractures to different bones are the most commonly reported accident. Fractures listed are to fingers, ankles, upper and lower limbs; heel and foot fractures have also been reported.

One issue that was also reported was the inhalation of fish proteins, which one worker was hyper sensitive to. This does raise the question of what impact/harm this is causing workers over time. Particularly as we know that constant inhalation can lead to people developing asthma.

The BFAWU has written to the HSE asking them to urgently review health and safety practices and processes across the salmon industry in Scotland and we hope that you will support us on this.

Please have a look at the following data and write to the HSE supporting our call. We have provided a letter below for you to personalise and send.

The Health and Safety Executive Scotland
Queen Elizabeth House
1 Sibbald Walk
Edinburgh
EH8 8FT

Dear HSE

I am getting in touch regarding information that has recently come to my attention. This information relates to the Salmon industry in Scotland and the regularity and severity of accidents that have occurred throughout the industry in the past 5 years.

The HSE is aware of these accidents as these have all been reportable accidents as per the RIDDOR requirements. Can i therefore ask you to undertake an urgent assessment of health and safety across the Salmon industry with a view to making recommendations to help improve health and safety in this industry by reducing the number of accidents currently afflicting it.

I look forward to your reply

Yours,

MSP Briefing - Health and Safety in the Salmon industry

New FOI Data From the HSE

Employer	Number of Accidents	% of accidents
Mowi Rosyth	28	20%
Mowi Fort William (fish farms)	22	16%
Scottish Sea Farms	19	14%
Loch Duart	19	14%
Bakkafrost	14	10%
Cook Acquaculture	12	8.70%
Kames Fish Farming	9	6.50%
Wester Ross Fisheries	5	3.50%
Company name redacted	10	7%

Type of Accident	Number	%
Contact with machinery	10	7%
Exposure to harmful substance	3	2%
Fall from height	18	13%
Lifting and handling injuries	30	21.50%
Slip, trip and fall same level	39	28%
Struck against	5	3.50%
Struck by moving vehicle	4	3%
Struck by object	13	9.50%
Another kind of accident	16	11.50%

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Type of injury	Number	%
Amputations	3	2.10%
Fractures	39	28%
Burns	1	0.70%
Concussion and internal injuries	3	2.10%
Contusions and Bruising	10	7%
Dislocation without fractures (mainly)	6	4.50%
Lacerations and open wounds	11	8%
Loss of consciousness	2	1.50%
Other injuries/not known	13	9.40%
Fatality	1	0.70%

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Body Part	Number	%
Finger and fingers	22	16%
Back	18	13%
Upper limbs	17	12%
Ankle	16	11.50%
Lower Limb	13	9.50%
Trunk	11	8%
Hand	10	7%
Foot	9	6.50%
Head	4	3%
Neck	3	2.50%
Several locations	4	3%
Unknown locations	2	1.50%
Wrist	2	1.50%
Eye	2	1.50%
Ear	1	0.70%
Face	1	0.70%
Toe	1	0.70%
Torso	1	0.70%

MSP Briefing - Health and Safety in the Salmon industry

Sarah Woolley General Secretary of the BFAWU said about this fresh evidence of health and safety accidents across the salmon industry:

""This new information, showing how accident-ridden the salmon industry is, is deeply shocking and confirms that our union was right to raise health and safety concerns in our recent report 'On the line, Worker Treatment and conditions at Mowi Rosyth'.

The number of fractures suffered by workers, including one worker who suffered a broken neck, another a broken back, and some even losing their fingers, reflects an industry that doesn't take the health and safety of its workers anywhere near seriously enough. It also stands in stark contrast to other workplaces where we have members. At Warburtons Bakery at Bellshill for example there has not been one accident reported this year to the HSE.

It should be stressed that the accidents reported to the HSE about the salmon industry are just the ones we know about. We have no idea about minor injuries, or neck/shoulder/arm/back pain, or the stress that workers suffer working in the salmon industry experience.

This is because they don't result in longer term absences from work and therefore do not need to be reported to the HSE. Nor do we know what the long term impacts are for workers who are being exposed to, and inhaling, fish proteins every day of their working lives.

These figures suggest the salmon industry is not doing anywhere near enough to drive health and safety improvements. We believe that the HSE must urgently review working practices and health and safety training and procedures across the industry.

It is always the case that unionised workplaces are safer and that's why we have sought to engage Mowi at Rosyth (the source of the biggest proportion of accidents).

For some time now we have sought meetings with Mowi senior management, including their CEO in Norway, so that we can work with the company to help improve the terms and working conditions of the workforce there. Up until now they have rejected our attempts to get round the table with each other.

This new evidence must surely mark the time for the industry to eventually meet with our trade union so that together we can help the salmon industry become a much safer industry to work in.

MSP Briefing - Health and Safety in the Salmon industry

We have again written to Mowi in light of this new information. We have told them we are here to help; we hope that the company listens and agrees to meet with us so that once and for all the health and safety and wider terms and conditions of workers can be improved across the whole salmon industry."

The media in Denmark and Scotland have recently covered concerns about working conditions at Mowi, please see:

[**Salmon Giant Accused of poor working conditions**](#)

[**One worker killed and dozens hurt in accidents**](#)

[**Reports Shocking Claims over Fish Factory Conditions**](#)

[**Mowi Salmon Workers Are Treated Worse than the Fish**](#)

[**A Wake up Call to Management**](#)

[**Earning millions in Denmark: Amputated fingers, broken bones and head injuries at salmon giant's facility**](#)