12th February 2026

Dear Members of the Rural Affairs and Islands Committee,

Compassion in World Farming (Compassion) welcomes the review of the Scottish salmon farming industry, following on from the Rural Economy and Connectivity Committee's session 5 report on this issue, which flagged concerns about the long-term viability of the Scottish salmon industry.

Please find enclosed our submission, outlining key issues relating to salmon farming in Scotland. This document summarises current evidence on environmental impacts, animal welfare considerations, interactions between farmed and wild salmon, and the economic and social contribution of the sector.

The submission below highlights continued high mortality levels within the industry, ongoing challenges in sea lice management, and significant gaps in consolidated mortality reporting. It also identifies limitations in regulatory oversight, including minimal unannounced inspection activity over recent years. Animal welfare remains a central concern, not only for farmed salmon but also for cleaner fish such as lumpfish and wrasse, which experience high mortality rates yet remain largely absent from public reporting frameworks. It also identifies limitations in regulatory oversight, including minimal unannounced inspection activity over recent years. Animal welfare remains a central concern, not only for farmed salmon but also for

Our submission also considers the wider ecological implications of salmon farming, including risks to wild salmon populations through parasite transfer, disease exchange, environmental stress events, and chemical exposure. In addition, recent independent analyses are referenced to address claims around the economic value of the sector, including the decline in direct employment and the extent to which profits generated by multinational producers are retained outside Scotland.

We hope this submission is a useful contribution to the Committee's consideration and understanding of the current challenges facing Scotland's salmon aquaculture industry and informs discussions on how best to ensure high standards of environmental protection, animal welfare, and long-term sustainability.

Yours sincerely,

Anthony Field
Head of Compassion in World Farming UK

Rural Affairs and Islands Committee follow-up inquiry into the implementation of the Rural Economy and Connectivity Committee's session 5 report recommendations for salmon farming in Scotland

Submission by Compassion in World Farming

Environmental Impacts and Regulatory Reform

Mortality and Reporting Gaps

Recent industry data show that mortality levels remain high. Overall deaths in 2025 were approximately 1.5 million higher than in 2024, and substantially above levels reported in 2018, when parliamentary committees previously raised concerns about fish health and farm management.

Current mortality reporting obligations leave several categories of deaths outside consolidated public datasets, including:

- mortalities during live transport;
- deaths during the six week period following seawater transfer;
- culls and emergency harvests and;
- Cleaner fish deaths.

Whilst these deaths are recorded for other purposes, such as assurance scheme audits and corporate sustainability disclosures, the absence of a unified reporting requirement of providing data to Scottish Government means it is not possible to form a complete picture of trends across the sector.

As a minimum, there must be more robust, transparent data collection that consolidates all of the above to give a full picture of mortality levels within the salmon farming industry. *We urge the Committee to encourage the Cabinet Secretary to adopt this more comprehensive approach to data collection.*

Regulatory Oversight

Recent information obtained through freedom of information requests [1] indicates that the Animal and Plant Health Agency (APHA), which is responsible for enforcing welfare legislation, inspected just 21 of Scotland's 213 active salmon farms, between January 2023 and October 2025. None of the 20 worst-performing sites, which together accounted for more than 10 million deaths, were inspected.

Additionally:

- Over nearly three years, despite unannounced inspections being a 'statutory requirement', [2] only two unannounced inspections by the Fish Health Inspectorate were formally recorded between January 2023 and September 2025;
- The Animal and Plant Health Agency did not systematically distinguish between announced and unannounced inspections. The APHA has received 22 complaints of fish welfare abuses since 2022, but has never issued a formal warning, care notice or referred a case to the Crown Office and Procurator Fiscal Service. The 20 complaints that were investigated resulted in 12 actions and enforcement which were limited to verbal or written advice and follow-up visits;
- During the same period, Scottish salmon farmers recorded more than 35 million unexpected sudden deaths.

Inspection frameworks play a central role in managing environmental and welfare risks. The limited frequency of these inspections – particularly the near total absence of unannounced inspections – will be a significant hindrance to identifying welfare issues and mandating steps to address them in order to avoid repeated failures in future.

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[1] https://www.theguardian.com/business/2026/feb/05/more-than-35m-unexpected-salmon-deaths-at-scottish-farms-sparks-outcry

[2] https://www.gov.scot/policies/fish-health-inspectorate/surveillance-programme/

Sea Lice Management

Sea lice levels on salmon farms, already far too high, continue to rise. The second half of 2025 has seen much higher lice levels than seen in previous years. For example, August 2025 saw average lice counts more than double from the previous year, and 2025 saw almost 1200 recordings of lice above the limits set out in the Code of Good Practice guidelines. This is the equivalent of more than 3 breaches for every day of 2025. [3]

Additionally, nearly one-quarter of active farms exceeded Code of Good Practice (CoGP) thresholds. Analysis of Scottish salmon farm data by Animal Equality indicates that nearly one-quarter of active farms frequently exceed the industry's own (CoGP) lice thresholds at any given time. During sensitive periods for wild salmon, 1 in 4 weekly sea lice counts were above these thresholds, with over 50% of active farms breaching them at least once. [4]

As well as contributing to welfare issues on farms, sea lice also represent a significant challenge for managing environmental impact and safeguarding wild salmon due to the increased numbers meaning increased risk of parasite transfer to wild migrating fish.

Pending Government Guidance

The Scottish Government has committed to developing new official guidance on regulation of the sector. This is a welcome first step but does not go far enough.

Regarding the Guidance, as yet, there is no published detail on:

- the scope of this guidance;
- expected regulatory changes or;
- a timeline for publication.

Furthermore, we would encourage the Government to develop legislation to offer better legal protections to farmed salmon.

Additionally, greater transparency would enable stakeholders to prepare for potential adjustments in regulatory requirements (whether Guidance or Legislation).

Finally , it should be noted that the UK Government's Animal Welfare Strategy for England [5] has a far stronger commitment to protecting the welfare of fish at the time of slaughter: it has committed to introducing legislation, rather than the Scottish Government's recently published Guidance. We urge for legally enforceable protections both on farm and at slaughter.

Animal Welfare

On-Farm Health

Sustained high mortality is one of the strongest indicators of poor welfare outcomes in intensive aquaculture systems. Contributing factors identified in industry and scientific reporting include:

- parasitic infections such as sea lice;
- gill diseases;
- handling practices;

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[3] https://www.thenational.scot/news/25834438.scottish-salmon-farms-breached-sea-lice-limits-1200-times-2025/
[4] https://animalequality.org.uk/news/2025/11/03/animal-equality-analysis-reveals-hundreds-of-lice-breaches-on-scottish-salmon-farms/
[5] https://assets.publishing.service.gov.uk/media/694560bd3022cdf03a0eb81c/E03517059_-_CP_1474_Animal_Welfare_Strategy_Accessible.pdf

- stocking densities and;
- and environmental conditions in sea cages.

As mentioned previously, incomplete mortality data limits the ability of the Scottish Government (or independent bodies) to assess whether welfare improvements are being achieved and we encourage the Committee to impress upon the Scottish Government the need for more comprehensive data collection. This would allow for more thorough monitoring of welfare progress (or lack thereof) within the industry and what actions (if any) the Government might need to take to address this.

Cleaner fish Welfare

Cleaner fish – particularly lumpfish and wrasse – are widely used for biological sea lice control. Cleaner fish welfare has historically received less attention than that of salmon, but, evidence indicates substantial welfare challenges and concerns. In addition to lice control, high mortality events and disease susceptibility, there are issues regarding:

- Exposure to harmful treatments: Freshwater treatments conducted on wellboats can kill cleaner fish if they cannot be removed beforehand. A Fish Health Inspection report noted that some treatments were carried out on vessels unable to grade out lumpfish, contributing to mortality;
- Lack of transparency: There is no mandated reporting scheme for cleaner fish mortality. Independent analysis notes that "millions of 'cleanerfish'… die each year" without being recorded in national datasets. [6]

Farmed–wild interactions arise through several pathways:

- Parasite transfer: Elevated lice levels on farms can significantly increase mortality risk for migrating wild juvenile salmon;
- Disease pressure: Open-net pen systems allow pathogens to move between farmed and wild fish;
- Chemical impacts: Treatments used to control lice – such as freshwater delousing or sea-based chemical treatments – may enter surrounding waters;
- Escapes: Escape events involving wrasse or salmon introduce risks of ecological disruption and genetic mixing.

Recent inspection reports document recurring issues such as gill disease, lice damage, and environmental stressors, all of which pose risks to surrounding ecosystems.

Concerns have also been raised about the cumulative impact of treatments and therapeutants on coastal ecosystems.

Economic and Social Benefit

Direct Employment Trends

The latest Scottish Fish Farm Production Survey found an 8% decline in direct employment, attributed largely to increasing automation. This trend suggests that salmon farming's contribution to rural employment may be diminishing.

Economic Contribution and Profit Flows

[6] https://animalequality.org.uk/news/2025/10/29/death-rate-on-scottish-salmon-farms-worst-in-35-years/

Although salmon is marketed as a major Scottish export, most producers are multinational companies, meaning profits often flow outside Scotland. Analyses submitted to the Rural Affairs and Islands Committee – including Heriot-Watt University's economic assessment [7] and a recent WildFish report [8] – highlight:

- unaccounted for environmental costs and externalities (e.g., chemical inputs, benthic impacts, pressures on wild fish stocks) impose costs on other sectors;
- potential impacts on wild fisheries and coastal tourism;
- the limitations of headline export metrics in assessing net national benefit and;
- local benefits may be overstated when supply chains and profit flows are global rather than domestic.

Interaction With Other Marine Industries

Water quality issues, parasite spill-over, and chemical use can negatively affect recreational angling, tourism, and shellfish fisheries. These cross-sectoral impacts suggest the need for integrated marine management that also considers animal welfare when evaluating the economic footprint of salmon aquaculture.

Understanding cross-sectoral impacts is important for assessing the net economic effect of salmon aquaculture. Until a full assessment has been undertaken of this, further expansion of the industry should be paused.

Conclusion

Significant concerns remain across all major dimensions of Scotland's salmon farming sector. Persistently high mortality rates, continued lice exceedances, limited regulatory oversight, unclear economic benefits, and substantial welfare issues – especially concerning cleaner fish – suggest that systemic improvements are necessary for long-term sustainability and to help futureproof the industry in Scotland.

Clearer regulation, comprehensive reporting, and strengthened welfare and environmental protections would support better outcomes for animals, coastal ecosystems, and rural communities.

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[7] https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/correspondence/2026/salmon-farming-22-january-heriot-watt
[8] https://wildfish.org/latest-news/independent-analysis-shows-salmon-farming-is-failing-to-pay-its-way-in-scotland/