

Dear Members of the Rural Affairs and Islands Committee,

I am writing ahead of your forthcoming scrutiny of salmon farming in Scotland to express deep concern about the cumulative environmental impacts of open-pen salmon aquaculture on Scotland's marine ecosystems and on wild Atlantic salmon.

Wild Atlantic salmon are now officially red-listed and in crisis across much of their range. In Scotland, many rivers are experiencing historically low returns. These declines are the result of multiple pressures — including climate change, habitat degradation and marine survival challenges. However, the existence of wider pressures does not justify tolerating additional, avoidable risks. Where a species is already in serious decline, policy must err decisively on the side of precaution.

Your Committee's previous report on salmon farming identified persistent and systemic issues, including high farm mortality rates, disease outbreaks, sea-lice proliferation, benthic impacts, escapes, and weaknesses in monitoring and enforcement. Submissions to the Committee since then have continued to highlight concerns about pathogen transfer, genetic introgression from escapees, and the adequacy of spatial planning where migratory wild salmonids pass near open-pen sites.

Open-pen aquaculture, by its nature, allows for the free exchange of water — and therefore parasites, pathogens, and waste — between farmed and wild fish. While industry frequently argues that causation is difficult to prove conclusively at population scale, the precautionary principle exists precisely for situations where risk is credible, harm may be irreversible, and scientific certainty is incomplete. In the case of wild Atlantic salmon, the potential consequences of regulatory failure are permanent. Once lost, distinct river stocks cannot be recreated.

I would urge the Committee to consider recent Canadian Federal Court rulings concerning open-net pen farming in British Columbia. The Court found that the risks posed to wild salmon were legally and environmentally unacceptable in key regions and upheld decisions to phase out such operations. While Scotland's geography and regulatory framework differ, the underlying principle is directly relevant: where credible scientific concern exists regarding pathogen transmission and ecological risk to vulnerable wild salmon populations, the burden must fall on regulators to demonstrate safety — not on wild fish advocates to prove catastrophe.

Scotland prides itself on its natural heritage and on the international reputation of its wild fisheries. Recreational salmon angling contributes significantly to fragile rural and island economies, sustaining local employment, tourism and cultural identity. Continued decline of wild salmon would not only represent ecological loss, but also economic and reputational damage.

Given the gravity of the situation, I respectfully ask the Committee to:

- Acknowledge the relevance of international legal developments, including the Canadian Federal Court rulings, to Scotland's policy framework.

- Examine whether current regulation, enforcement capacity, and cumulative impact assessment genuinely meet a precautionary standard for a red-listed species.
- Consider a moratorium on new or expanded open-pen developments in areas of migratory significance until independent evidence can demonstrate no material risk to wild salmon.
- Strengthen transparency requirements around mortality data, disease outbreaks, sea-lice reporting, and escape events.
- Explore accelerated transition pathways toward closed or semi-closed containment systems that materially reduce interaction between farmed and wild fish.

This is not an argument against employment or against aquaculture as such. It is an argument for responsible governance in the face of ecological risk. When a species is already in marked decline, “managing” additional pressure is not enough. Precaution must be meaningful.

History will judge harshly if, despite repeated warnings and multiple inquiries, we allow further avoidable damage to a species so deeply woven into Scotland’s ecological and cultural fabric. Once wild salmon are gone, they are gone.

I urge the Committee to take this opportunity to strengthen safeguards and ensure that Scotland’s regulatory framework truly protects the marine environment and its iconic wild fish.

Thank you for your consideration.

Yours sincerely,

Simon

Simon Holme