

Mairi Gougeon
Cabinet Secretary for Rural Affairs, Land Reform and Islands
Scottish Government

25 March 2026

Dear Cabinet Secretary,

Follow-up inquiry into salmon farming in Scotland

Thank you for giving evidence on 11 March regarding the [Committee's follow-up inquiry into salmon farming in Scotland](#).

After reflecting on the evidence heard at this meeting, the Committee agreed to write to you with its assessment of progress made by the Scottish Government and the salmon farming sector since its inquiry report was published in January 2025. These comments are expressed in further detail in the Annexe to this letter.

Overall, the Committee is disappointed that across key areas of its inquiry recommendations, progress in future-proofing the salmon farming industry has not occurred with the urgency called for one year ago. The Committee does, however, acknowledge the positive steps made towards some of its report's recommendations, most notably the Scottish Government's commitment to introduce baseline standards for the welfare of farmed fish through new official guidance under the Animal Health and Welfare (Scotland) Act 2006 Act.

The Committee is particularly concerned that its key recommendations aimed at addressing farmed fish mortality through strengthened regulation and oversight of farms and improved transparency, have not been accepted by the Scottish Government. The Committee expects to see sites with persistently high mortality to be regulated effectively and does not agree with the analysis of the Scottish Government that this does not represent a systemic issue. Without meaningful actions to enhance the performance of the industry with regards to mortality, the Scottish Government risks eroding public confidence in this important sector.

The Committee also remains concerned by a lack of progress in implementing recommendations that seek to protect wild salmon populations from the risks posed by farmed salmon. The Committee believes that a wide-ranging inquiry into wild salmon could be of significant value to understanding the reason for declining stock numbers and what actions could help to reverse this trend and has suggested that its successor committee undertakes this work in the next session.

In conclusion, the Committee stands by its report's recommendations and expects the Scottish Government to set out a work plan in the early part of the next Parliament to deliver them to ensure the industry is placed on a sustainable footing and able to provide employment and prosperity for Scotland's rural communities for future generations. Failure to act decisively and with urgency would allow commentary around the industry's future to persist.

Contact: Rural Affairs and Islands Committee, The Scottish Parliament, Edinburgh, EH99 1SP.
Email: rural.committee@parliament.scot. We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

Yours sincerely,



Finlay Carson MSP
Convener

Annexe

Powers to Fish Health Inspectorate to limit or halt production

Whilst the Committee acknowledges the analytical work undertaken by the Scottish Government represents a meaningful attempt to examine its recommendations for addressing persistent high mortality at some sites, it remains concerned about perceived gaps in the methodology adopted to carry out this analysis. In particular, given the choice of analysts to screen only the 95th percentile of site mortality at the national level, the Committee is unclear whether the model would capture all problem sites if the national level of mortality is already high.

The Committee notes that the Scottish Government has not committed to provide powers to the Fish Health Inspectorate to halt or limit production at sites with persistent high mortality rates. While the Scottish Government's analytical model showed that persistent elevated mortality is not a systemic issue, this does not prevent systemic issues from occurring in the future.

Mortality and fish health reporting

The Committee has understood and observed the limitations of the available mortality datasets and agrees with the Scottish Government's assessment that no single dataset provides a complete picture. Having heard evidence from the Scottish Government and industry, it is clear to the Committee that its recommendation for mandatory mortality reporting would not be overly burdensome for producers and regulators. The Committee questions whether the Scottish Government, in opposing its recommendation, has fully considered the potential benefit of comprehensive mandatory reporting in preventing misinterpretation and improving public confidence and trust when it comes to industry's performance on mortality.

The Committee acknowledges that industry is apprehensive to transition to mandatory reporting on the basis that "the level of transparency has to be reasonable". However, it believes mandatory reporting could be beneficial in enhancing trust in the sector, given it already collects this data and could help to strengthen reputation for transparency amongst consumers and the wider public.

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The Committee also believes that the Scottish Government and regulators currently place too much burden of interpreting and understanding salmon farming datasets on stakeholders and the public. While the Committee acknowledges improvements made to Scotland's Aquaculture Website, further work is needed to provide clear, user-friendly information on fish health and wider regulatory compliance and performance of salmon farms. This should include an annual fish health report, as previously recommended, and further improvements to enable users to view meaningful performance metrics at site-level, akin to Norway's BarentsWatch website.

Science and innovation

The Committee recognises that further research initiatives have been carried out since its inquiry into the climate challenges facing the salmon farming industry. Whilst the Committee is supportive of these projects, it notes that its calls for this programme of work to be Government-led have not been taken forward. The creation of Sustainable Aquaculture Innovation Centre is, however, a welcome development in progressing the Committee's recommendation around innovation and research, including its calls for dedicated research pens.

SEPA's Sea Lice Risk Framework

The Committee is conscious of live legal proceedings taking place in relation to SEPA's sea lice risk framework and the limitations this places on discussing the specifics of individual appeals. It is, however, disappointing that delays to the implementation of the revised regime has prevented the Committee being able to make a meaningful judgement on the effectiveness of SEPA's sea lice risk framework in delivering the robust monitoring and regulatory processes for protecting wild salmon populations it called for in its inquiry report.

The Committee is also concerned that there appears to be no contingency measures in place to mitigate sea lice risk while progress on implementation is on hold and the Scottish Government has advised against the requirement for environmental management plans. The Committee calls on the Scottish Government to set out, as a matter of urgency, what interim measures it intends to put in place to mitigate sea lice risk to wild salmon during the period in which the framework remains subject to legal challenge.

Interactions between farmed and wild salmon

The Committee is concerned that the Scottish Government and its agencies have not responded effectively to its recommendations relating to the interactions between farmed and wild salmon populations. The Committee's inquiry report highlighted the risks that fish farming poses to wild salmon populations, particularly through escapes and the transfer of sea lice. It also called on the Scottish Government to introduce a range of measures to better protect wild stocks, including penalties for escapes and strengthening mechanisms for more strategic siting of salmon farms and the ability to relocate existing farms. These issues and their solutions are not new: they are well-documented in previous parliamentary inquiries and the 40 recommendations made

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by the Salmon Interactions Working Group in 2020. Progress in delivering them has stalled.

At the same time, the Committee is cognisant that there is much about the decline in wild salmon populations that remains unknown, and that salmon farming represents one of many pressures on wild Atlantic salmon which also require further investigation. This is why the Committee recommended in its legacy report that its successor Committee undertake a parliamentary inquiry into wild salmon in session 7. The Committee understands this recommendation would be supported by both the farmed and wild salmon sectors.

Planning and consenting of salmon farms

The Committee notes there has been little, if any, progress in implementing its recommendations to facilitate the relocation of farms to improve fish welfare and mitigate environmental impacts. This is despite the Committee requesting that discussions between the Scottish Government and industry around developing this mechanism be “progressed as a matter of urgency”.

The Committee shares industry’s disappointment that, despite the work of the consenting task group, improvements to the consenting process have not been forthcoming with the level of urgency called for last year. However, the Committee is supportive of regulations introduced by the Scottish Government that extend marine planning zones from 3-12 nautical miles and believes this, alongside corresponding changes to SEPA’s regulatory responsibilities, should make it easier to site farms at more exposed and offshore locations.