

## Evidence to the Rural Affairs and Islands Committee on the impact of changes in the planning law to permit salmon farms moving from the present limit of three nautical miles to 12 miles from the coast line.

### Introduction

1. The RSPCA is pleased to respond to this inquiry looking at the impact of extending planning permission for salmon farming up to 12 nautical miles from the coast from the present three. The RSPCA is the oldest and largest animal welfare organisation in the world, set up in 1824 to investigate farm animal welfare complaints through our inspectorate. We work to improve farmed salmon welfare through the development of higher welfare standards for use on farms to ensure salmon live a better quality of life and to provide the consumer of farmed fish a higher welfare solution. This is achieved through the RSPCA Assured scheme. The RSPCA writes the welfare standards used by RSPCA Assured, the UK's only animal welfare assurance scheme that sets higher animal welfare standards. This was set up in 1994. RSPCA Assured accounts for around 75-80% of salmon production in Scotland.
2. The Rural Affairs and Islands Committee notes "the broad support for a mechanism to facilitate the relocation of existing sites, to give industry the flexibility to relocate to protect fish welfare and mitigate environmental impacts" and agreed that "the relocation of sites must be done with a full understanding of the environmental and fish health and welfare risks associated with the relocation of fish farms, as well as the economic and social impact on fish farm staff and local communities." The Committee called for Scottish Government commission research to assess the potential risks and benefits of moving fish farms further from the coast and to more exposed or higher energy flow sites. The RSPCA agrees with this recommendation.

### RSPCA position

3. At present no salmon farms exist between three and 12 nautical miles from the coast in Scotland so the RSPCA recommends that the welfare challenges for the fish need to be examined as a priority. The RSPCA views offshore fish farming as "novel" and would not, at this time, consider it automatically for the RSPCA standards without further research and evidence.
4. The RSPCA considers that offshore fish farms have a number of risks including exposure to rougher weather and conditions, greater stress on equipment and infrastructure (increasing risk of damage) and the lack of shelter for the fish who cannot, for the most part, avoid the conditions. Offshore locations are subject to stronger currents, larger waves, and more extreme weather events compared to sheltered coastal areas. These conditions can cause physical injury to the salmon through collisions with net pens or other fish, and can also induce chronic stress.

The impact on the swimming capacity of the farmed salmon is critical, as salmon cannot maintain maximum swimming for long periods. Little research has been done on the impact of prolonged high water velocities (e.g. above 0.6m/s) and wave heights in these systems on fish welfare which at present is largely unknown.

5. The RSPCA considers that the use of cleanerfish should not be permitted in offshore farms particularly those with high water currents. Research suggests that cleanerfish species may not thrive in the harsh environmental conditions of offshore farms, raising welfare concerns for the cleaner fish themselves. The RSPCA was the first to set welfare standards for cleaner fish in 2018 after years of development. Currently, the level of mortality of cleaner fish is unclear, so ultimately the RSPCA would like to see no cleaner fish being used as they are replaced by other methods to prevent sea lice infection but in the interim we believe the most sustainable way forward on the use of cleaner fish is to rely on hatchery reared fish. The Scottish Animal Welfare Committee is undertaking an enquiry into the welfare of cleaner fish which is due to report imminently. The RSPCA will assess any recommendations that are made by the Committee and urge the Scottish Government to implement measures across all fish farms but does not believe cleaner fish should be used in offshore farms.
6. It is assumed that offshore fish farms will result in larger enclosures holding larger numbers of fish than currently seen in Scotland. Larger enclosures will make routine practices, such as the handling of fish for health and welfare checks, the removal of moribunds and treatments and harvesting, much more difficult. Although some of this could be offset by technology (e.g. AI cameras, ROVs), these are not currently used widely in Scotland and so are unproven. As offshore farms are likely to be more capital intensive, producers may advocate for higher stocking densities. High stocking densities, where a large number of fish are confined in a limited space, can lead to stress, increased aggression, and physical injuries such as fin damage. While offshore farms may offer larger spaces, ensuring appropriate stocking densities to prevent welfare issues remains crucial.
7. Offshore environments could make administering treatments for diseases and parasites more complex and costly due to the remoteness and potentially harsh weather conditions. Ensuring humane slaughter methods in offshore environments is essential and could also be more complex.
8. The RSPCA recognises that new, novel or different equipment and structures might be used than currently found in sea farms in Scotland but these methods are as yet untested in Scotland. In these circumstances, the technology is considered “novel” and is not covered by the RSPCA welfare standards without research and evidence. The RSPCA is also concerned that as equipment and infrastructure will be more expensive and capital investment higher this may result in higher salmon stocking densities, which the RSPCA do not support.

9. Reaching the farms at all may be problematic in unfavourable weather conditions. This could be critical for response times to emergencies which will inevitably be longer and more complicated. This could also encourage further industry expansion (rather than replacement of production), as additional areas will become available in which to place farms. The RSPCA believes that any further expansion should be linked to addressing the welfare challenges in salmon farming that have been evidence in the 2025 RAIC report and that the RSPCA has outlined in this evidence.
10. The RSPCA also has concerns on the potential impact of the proposals on the wildlife, such as birds and cetaceans, which inhabit these areas. The impact of these proposals is unknown and further research is required.
11. So there are a number of areas where further research is required to maintain the welfare of the farmed fish as set out above and the RSPCA does not support the development of offshore fish farms until these areas have been addressed and better understood.
12. The RSPCA recognises that there are some potential advantages of the proposals. Firstly it could result in further separation of farmed and wild salmon. Secondly it could improve the water quality with the farm environment. Offshore environments generally have stronger currents and greater water exchange. This can lead to better oxygen levels and more effective dispersal of waste products, potentially contributing to a healthier environment for the salmon and reducing stress related to poor water quality.
13. In theory, offshore fish farming could results in less parasites, such as sealice, and improved gill health but there is a lack of evidence on these impacts and further research is required. The understanding of the RSPCA is that offshore farms are not exempt from the risk of sealice, and controlling sea lice in these environments can be challenging, especially with strong currents potentially affecting the efficacy of treatments.
14. Offshore sites typically offer larger areas for farming. This greater space allowance could, if managed with appropriate stocking densities, allow salmon more room to swim and potentially exhibit more natural behaviors compared to inshore pens. Offshore sites could encourage or allow for lower stocking densities, which is a key factor in reducing stress, aggression, and disease transmission among farmed fish. But this is not guaranteed and depends on farm management practices.
15. Whilst offshore salmon farming offers some potential advantages for fish welfare related to water quality, space, and reduced coastal stressors, these benefits can only be realized through responsible development, careful management practices, and robust regulatory oversight. The inherent challenges of the offshore environment must be addressed to ensure that moving farms further out to sea genuinely leads to improved welfare outcomes for the farmed salmon. Strong regulations and monitoring are needed to ensure that offshore farms operate with high welfare standards.
16. At present animal welfare is not taken into account in planning applications so the RSPCA remains concerned that if any welfare concerns are found these would not be addressed as part of the planning decision process. We recommend that animal welfare should be taken into account as part of the planning process in Scotland.