

**Monday 12th January 2026**

Dear Members of the Rural Affairs and Islands Committee,

It has now been 12 months since the Committee expressed concern over the 'long-term viability of the Scottish salmon industry'.

Concerns over fish mortalities, the use of 'cleanerfish', a lack of available data and transparency, impacts on wild salmon, and more, culminated in a call for urgency and leadership from the Scottish Government.

Now, one year on, the Committee has a chance to critically assess whether or not these concerns have been alleviated and, if not, whether they can be confident that the remaining challenges will be treated with urgency.

As Committee Members you hold great power and a unique responsibility.

As you are aware, the REC Committee came shy of recommending a pause to the industry's expansion. With the benefit of hindsight, the former Convener, Edward Mountain MSP, has made it clear that he would act differently given the opportunity: *"If I had known where we would be today, I would have joined those Committee members who called for a moratorium in 2018, because that would have made the industry pay attention."*<sup>1</sup>

Having dedicated nine months to this comprehensive inquiry, you now have a chance to help shape Scotland's future for the better. Scotland is at a crossroads and Members can decide which path the country will take: continue with the status quo or act on behalf of local communities, workers, animals, and the environment.

To that end, this letter sets out why, based on evidence since the release of the Committee's report, a pause on expansion is now justified and necessary, primarily because:

- Mortality levels, escapes, and lice breaches are worse than in 2018
- Enforcement remains poor
- Key data remains hidden due to voluntary reporting
- Industry behaviour is increasingly defensive and obstructive

Yours sincerely,



**Abigail Penny**  
Executive Director  
Animal Equality UK  
[abigailp@animalequality.org.uk](mailto:abigailp@animalequality.org.uk)

---

<sup>1</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

### Assessing progress

At this stage one year on, in order to have confidence that the Committee’s recommendations have been taken seriously by the Scottish Government and industry, Committee Members must see:

- **True transparency:** The full facts made public – particularly with regard to mortalities – so progress can be tracked and measured, and future challenges mitigated.
- **From Government:** A genuinely stringent approach, with officials who are willing and able to enact stronger legislation and enforce proper penalties when met with non-compliance, at pace.
- **From industry:** Appropriate acceptance that serious challenges do indeed remain and an authentic willingness to tackle them, now and moving forward.

Without all three of these necessary safeguards in place, we believe it would be irresponsible to allow the industry to continue expanding.

### Scottish Government’s approach

#### 2018 recommendations:

Progress on the 2018 recommendations was alarmingly poor, with the Committee recognising the ‘slow progress’ made. While some improvements have been made, overall the situation since 2018 has remained the same or significantly worsened:

Then (2018)	Now				
“The Committee considers the current level of mortalities to be too high”	Reported mortalities were 187% <sup>2</sup> higher in 2025 than 2018. <table border="1"> <tr> <td>2018</td> <td>3.8M</td> </tr> <tr> <td>2025</td> <td>10.9M</td> </tr> </table>	2018	3.8M	2025	10.9M
2018	3.8M				
2025	10.9M				
“The Committee does not underestimate the serious challenge which gill health disease presents to the industry. Indeed, it has difficulty in understanding how expansion of the industry can reasonably occur if this issue is not satisfactorily resolved”	Deaths due to gill health were 425% <sup>3</sup> higher in 2025 compared to 2018. <table border="1"> <tr> <td>2018</td> <td>0.8M</td> </tr> <tr> <td>2025</td> <td>4.2M</td> </tr> </table>	2018	0.8M	2025	4.2M
2018	0.8M				
2025	4.2M				
“The Committee notes that strict penalties are in place in Norway to deal with escapes and recommends that appropriate sanctions should be developed and introduced in Scotland”	Despite the largest salmon escape in a decade <sup>4</sup> (80k fish, 2024), and another in 2025 <sup>5</sup> (c. 75k fish); no financial penalties were issued.				
“The Committee welcomes SEPA’s statement in its draft Finfish Aquaculture Sector Plan that it will apply monetary penalties to those who fail to comply with its proposed strengthened regulatory standards. The Committee considers	Between April 2023 – January 2025 SEPA saw an average of one non-compliance every six days <sup>6</sup> ; no financial penalties were issued.				

<sup>2</sup> <https://www.gov.scot/publications/fish-health-inspectorate-mortality-information/>

<sup>3</sup> <https://www.gov.scot/publications/fish-health-inspectorate-mortality-information/>

<sup>4</sup> <https://oceanographicmagazine.com/news/largest-escape-of-farmed-salmon-in-a-decade-finally-exposed/>

<sup>5</sup> <https://www.bbc.co.uk/news/articles/c201r94v3kwo>

<sup>6</sup> <https://www.heraldsotland.com/news/25115269.scottish-salmon-farms-might-fined-millions-elsewhere/>

<p>effective enforcement with appropriate penalties to be of significant importance in ensuring the industry complies with regulatory standards. It is also of the view that this is a necessary requirement should the industry wish to expand in a sustainable manner without causing damage to the environment. The Committee notes that SEPA now has additional tools at its disposal to raise revenue through enforcement action”</p>	
<p>“It is of the view that robust enforcement of regulatory standards is absolutely essential if they are to meet their intended purpose”</p>	<p>Between 2023 – October 2025 just 2 FHI inspections were unannounced.<sup>7</sup></p> <p>The FHI saw more than one non-compliance per week recorded in 2024<sup>8</sup>, and over 100 incidents of excess mortalities not being reported; no financial penalties were issued.</p> <p>To our knowledge, APHA has never issued a formal warning letter, Care Notice or reported a case<sup>9</sup> to the COPFS for consideration in relation to farmed fish.</p>

Appendix 1 shows, line by line, how many of the Committee’s 2018 recommendations remain unmet.

Despite the clear lack of adequate action, the Cabinet Secretary insists that “[the Scottish Government has] already made significant progress on key areas”<sup>10</sup>.

### **Scottish Government’s approach**

#### **2025 recommendations:**

Although the Committee called for an immediate timetable, emphasising the undeniable urgency of tackling key issues, the Scottish Government’s response was disappointing. It uses the word ‘explore’ 16 times and ‘scope’ or ‘scoping’ 13 times, and in subsequent debates the Cabinet Secretary has reinforced the need that “any regulation we introduce must be proportionate”<sup>11</sup>. The RAI Committee’s Convener acknowledges that it seemed “to be more of an update on progress, with minimal detail on the timescales for the recommendations to be delivered”<sup>12</sup>.

Such an approach from the Government should prompt the Committee to seriously question whether its recommended measures will indeed be as implemented in the ambitious and timely way it expects.

<sup>7</sup> Confirmed in an email exchange with FHI in September 2025.

<sup>8</sup> <https://www.heraldsotland.com/news/25115269.scottish-salmon-farms-might-fined-millions-elsewhere/>

<sup>9</sup> <https://www.heraldsotland.com/news/25115269.scottish-salmon-farms-might-fined-millions-elsewhere/>

<sup>10</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

<sup>11</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

<sup>12</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

***The promise of official guidance:***

To put this into context, while the Scottish Government has committed to put in place ‘robust and operationally feasible’<sup>13</sup> guidance – as requested by the RAI Committee, and which we welcome – it has yet to proffer any tangible details about what specifically that will comprise, nor a timeline. When explicitly asked for a date in which the official guidance will be published, the Cabinet Secretary instead stated ‘we will now consider the next steps to progress this work, including how we will work in partnership with the sector and other stakeholders’<sup>14</sup>.

Similarly, when questioned about an incident where salmon were found to be abandoned in a farm falsely declared fallow, the Cabinet Secretary failed to directly address the issue at hand, instead saying it recognises the recommendations made by the Committee, that “*there are specific strands of work on animal health and welfare in relation to this matter*”, and it has “*made a commitment to publish guidance*”<sup>15</sup>.

Such vague responses do little to reassure us that quick action is underway or that clearly egregious incidents are being handled with the seriousness they warrant.

***Rejection of mandatory mortality reporting:***

Another ongoing concern is the Scottish Government’s explicit rejection of full and mandatory mortality reporting, with the Scottish Government claiming that it would be a ‘burden’ for industry. Despite this statement, there has been no analysis carried out to justify this assumption<sup>16</sup> and the RAI Committee itself has confirmed that it ‘would not be overly onerous’<sup>17</sup>. Evidence of monitoring of culls and other deaths is clearly evidenced in ad hoc inspection reports and investor updates<sup>18</sup>.

This remains a point of contention and concern for many stakeholders, with the Committee’s Convener, Finlay Carson MSP, stating that it is “*regrettable*” and, when comparing mandatory sea lice counts that it makes him question “*even more why the cabinet secretary seems so reluctant to take a similar approach to tackling fish mortality.*”<sup>19</sup>

While the Scottish Government claims that further reporting would be ‘disproportionate’ and current reports are adequate for regulatory purposes, the current loopholes in voluntary reporting means only industry knows the true scale of death. Regulators, members of the public, and indeed Committee Members do not know how many fish are culled, die during transport, those who die during the six week transfer period, nor the number of ‘cleanerfish’ used and dying on farms. These glaring blind-spots prevent progress from being made and stoke polarisation, particularly since death rates will only inevitably worsen as waters further warm.

The RAI Committee expressed concern that ‘preventing high mortality events is not currently within the operational capability of industry’, so it is especially critical that this data is made available. And, without this information, how can sites with ‘pervasive’ mortalities be identified?

Further to this, huge numbers of deaths in freshwater continue to slip under the radar of Salmon Scotland’s reporting. Over 2.5 million deaths were reported at Applecross in 2025 (up to the end of November)<sup>20</sup>. In addition to the millions of freshwater mortalities, culled fish continue to make up an

<sup>13</sup> <https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6W-41933>

<sup>14</sup> <https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6W-42673>

<sup>15</sup> <https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6O-05197>

<sup>16</sup> <https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6W-42673>

<sup>17</sup> <https://www.parliament.scot/-/media/files/committees/rural-affairs-and-islands-committee/salmon-farming-in-scotland-report.pdf>

<sup>18</sup> <https://www.heraldsotland.com/news/25674419.seafood-award-farm-hit-mass-salmon-deaths-grim-october/>

<sup>19</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?iob=139523&meeting=16328>

<sup>20</sup> <https://www.gov.scot/publications/fish-health-inspectorate-mortality-information/>

unknown number of deaths, despite numerous references in the FHI data to ‘remaining stocked culled’. Bakkafrost’s Q4 trading update shows the culls carried out at the Couldoran hatchery cost the company 2 million DKK<sup>21</sup>; no mortalities or culls were reported to the FHI during this period (figures available to the end of November).

Likewise, since the Committee also has concerns over ‘the ethics and welfare implications of the use of cleaner fish... especially, around the high mortality rate’, it is essential to ask: how can mortality rates be addressed, and appropriate action taken, if they are not shared? There is no justifiable reason for the Scottish Government not to mandate full mortality reporting.

As the RAI Committee’s Convener said himself: “[I] struggle to see the Scottish Government acknowledge the seriousness of the challenges that the industry faces”<sup>22</sup>. We do too.

### **Industry’s approach**

“Denial and defence by threatening are not going to save the industry”<sup>23</sup> – strong words from the former Convener of the 2018 inquiry, Edward Mountain MSP. Time and again, the industry’s dismissive or combative approach is laid bare.

In a letter described as “threatening”<sup>24</sup>, Salmon Scotland’s CEO wrote to Committee Members and accused them of ‘double standards’ following the publication of the 2025 inquiry report. Publicly, the same CEO asserted that “significant progress” has been made and that “most of [the Committee’s] recommendations are for the Scottish Government.”<sup>25</sup>

When Animal Equality discovered a farm was falsely declared as fallow and dozens of fish were left in lice-infested waters, Tesco suspended the farm from its supply chain<sup>26</sup>. In response, trade publication ‘FishFarmingExpert’ simply said: ‘The suspension has no practical impact, as the farm remains fallow’<sup>27</sup>.

And when SEPA attempted to impose stronger controls on lice management, salmon farms lodged 210 appeals, in what was described as an attempt to “sabotage” better safeguarding efforts<sup>28</sup>. This stalled oversight of a major environmental risk at a time when lice levels are rising and harmful impacts could intensify. The second half of 2025 has seen much higher lice levels than seen in previous years, August 2025 saw average lice counts more than double from the previous year, and with one week left to go in December 2025 there were 1078 weekly counts above the Code of Good Practice guidelines (one Mowi farm reported lice levels over 15 times higher)<sup>29</sup>.

If confronted with wrongdoing – such as the industry’s own mortality or lice data, footage evidencing clear welfare abuses, or failures to meet CAR agreements – the industry’s consistent response is often to shoot the messenger or diminish the claims, while emphasising that the sector is vital for

<sup>21</sup> <https://www.salmonbusiness.com/scotland-remains-pressure-point-as-bakkafrost-reveals-brutal-q4-mortality-costs/>

<sup>22</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

<sup>23</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

<sup>24</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?job=139523&meeting=16328>

<sup>25</sup> <https://www.theguardian.com/environment/2025/jan/17/scottish-government-must-do-more-to-control-salmon-farming-inquiry-finds>

<sup>26</sup> <https://www.bbc.co.uk/news/articles/cx2y5l87nj2o>

<sup>27</sup> <https://www.fishfarmingexpert.com/animal-equality-uk-animal-welfare-bakkafrost-scotland/bakkafrost-scotland-tightens-up-after-fish-were-left-in-empty-farm/2023583>

<sup>28</sup> <https://www.theferret.scot/salmon-farms-210-appeals-lice-controls/>

<sup>29</sup> [https://aquaculture.scotland.gov.uk/csv/ms\\_sea\\_lice\\_current.csv](https://aquaculture.scotland.gov.uk/csv/ms_sea_lice_current.csv)

jobs and the economy<sup>30</sup>. This warrants reframing: is it ‘pro-worker’ to witness an industry that is responsible for life-altering worker injuries but fails to meet with the union concerned, is apparently unable to grapple high mortalities in ever-warming waters, suffers lice breaches on nearly one-quarter of active farms, harms the marine environment, and reports ‘brutal’ financial losses?

### **Recent developments**

Since the Committee’s report was released just 12 months ago, there have been a multitude of developments. We list some here, although this is sadly not exhaustive.

#### ***Animal welfare:***

- Industry data shows that the most recent **October mortalities were the worst on record**<sup>31</sup>, with over half a million fish dying at a single site due to jellyfish and disease. Industry-wide mortality was exceeded only during the record-breaking events of October 2023, blamed at the time on El Niño. See Appendix 2 for more information.
- The Scottish Salmon Farm Production Survey indicates that while production rose by 27% in 2024, **survival fell to the lowest level recorded since 1989**<sup>32</sup>, with almost one in three animals dying on farms.
- Onshore **hatchery deaths reached record levels in 2024**<sup>33</sup>, with over six million fish reported dead. At Applecross Hatchery, which received up to £5 million in public grants and which the Cabinet Secretary believed would “*deliver on improved fish and welfare*”, more than nine million fish have died since 2022. Information obtained via Freedom of Information indicates that over **1.3 million fish were culled in a single week**.
- Analysis of official data indicates that **at least seven million ‘cleanerfish’ have died since 2020**<sup>34</sup>. Farm-level data suggest over 22 million ‘cleanerfish’ were used during this period.
- Tesco suspended a fish farm after it was **falsely declared fallow**<sup>35</sup>; evidence of fish with **deformities, wounds, blindness, and lice infestations** was released from three farms linked to major supermarket suppliers; and **Mowi lost its Royal Warrant** following footage showing fish being beaten<sup>36</sup>.

#### ***Jobs, economy, and community:***

- Despite rising production, **employment in the sector fell by 8%**<sup>37</sup> according to the latest Production Survey.
- Between 2022 and 2023, **publicly-funded bodies provided £7 million to Mowi**, which paid **£1.269 million in UK tax** in 2022 and reported €5.6 billion in revenue in 2024.
- Independent analysis by Pareto Consulting and Professor Angela Tregear of the University of Edinburgh, commissioned by WildFish and SIFT, concludes that the industry is “*failing to pay its way*” and there is a **focus on gross rather than net impacts**, overreliance on self-reporting, failure to account for **displacement of other industries**, and **limited reinvestment** in local communities.
- Trade publications reported on the ‘**brutal Q4 mortality costs**’ (\$9.6 million) incurred by Bakkafrost<sup>38</sup>.

<sup>30</sup> <https://scottishfinancialreview.com/2024/02/15/salmon-ceo-attacks-desperate-tactics-of-campaigners>

<sup>31</sup> <https://www.heraldscotland.com/news/25674419.seafood-award-farm-hit-mass-salmon-deaths-grim-october/>

<sup>32</sup> <https://www.gov.scot/publications/scottish-fish-farm-production-survey-2024/>

<sup>33</sup> <https://www.gov.scot/publications/scottish-fish-farm-production-survey-2024/>

<sup>34</sup> <https://www.theferret.scot/million-lice-eating-fish-died-at-salmon-farms/>

<sup>35</sup> <https://www.bbc.co.uk/news/articles/cx2y5l87nj2o>

<sup>36</sup> <https://www.telegraph.co.uk/business/2025/11/05/salmon-supplier-loses-royal-warrant-beating-fish-death/>

<sup>37</sup> <https://www.gov.scot/publications/scottish-fish-farm-production-survey-2024/>

<sup>38</sup> <https://www.salmonbusiness.com/scotland-remains-pressure-point-as-bakkafrost-reveals-brutal-q4-mortality-costs/>

- **Worker safety concerns persist**, with hundreds of reported incidents across the sector, including serious injuries. These issues prompted Parliamentary attention via a Motion lodged by MSP Monica Lennon<sup>39</sup>.

#### **Environment and regulation:**

- Barcaldine Hatchery – visited by the Committee as part of its ‘fact-finding tour’ – **breached SEPA discharge limits** for bronopol and formaldehyde over 117 consecutive days<sup>40</sup>.
- Nearly a **quarter of active salmon farms breach the industry’s own lice** Code of Good Practice at any given time<sup>41</sup>. Despite this, farms lodged over 200 appeals against SEPA’s lice enforcement controls. **2025 was the worst full year on record for sea lice** levels since mandatory reporting began.
- Comparative analysis suggests that similar levels of non-compliance relating to **mortalities and escapes in other jurisdictions could have resulted in millions of Pounds in fines**<sup>42</sup>.
- A statutory instrument passed by **Parliament opens offshore waters to salmon farming**, despite warnings from the RAI Committee’s Convener that it risks “*putting the cart before the horse*”<sup>43</sup>, since the environmental impacts are not yet fully understood.
- **The Soil Association warned that it may withdraw certification** unless “*meaningful progress*” is achieved, citing unacceptable welfare and environmental risks<sup>44</sup>.

#### **Your decision**

The Committee’s Convener stated that it hoped to see satisfactory progress and that its latest report would be a “*wake-up call*”. With a string of serious issues coming to light over the past 12 months, few recommendations acted on and unclear deadlines for the remainder, a Government claiming progress, and an industry on the offensive, it does not appear to have been a wake-up call at all.

This is not a matter of ideology but rather a matter of fact. The reality is that if the Committee was concerned before then it should be just as concerned now, if not more so.

Since 1990, the industry has created just over 250 full-time farm jobs in the Highlands and Islands –an average of around seven per year<sup>45</sup>. There is little evidence that a pause on expansion would threaten significant employment. If existing jobs are at risk it is reasonable to question whether it is good governance for rural communities to depend so heavily on a single industry with persistent welfare, environmental, and regulatory challenges.

As Committee Member Emma Roddick MSP stated in March 2025, there is “*justification for a pause on expansion*”, “*doing any less would be irresponsible*”, and the Scottish salmon industry is evidently “*not an industry which is going to change practices unless it is forced*”<sup>46</sup>.

In light of the lack of progress in certain areas over the past seven years, and the reported incidents since the 2025 report was issued, **we strongly urge the Committee to recommend a pause on new salmon farms and on the expansion of existing farms.**

<sup>39</sup> <https://www.bbc.co.uk/news/articles/cq8453ql11vo>

<sup>40</sup> <https://www.theferret.scot/salmon-farm-ban-polluting-loch-creran/>

<sup>41</sup> <https://www.heraldsotland.com/news/25585574.hundreds-breaches-salmon-industrys-lice-standards/>

<sup>42</sup> <https://www.heraldsotland.com/news/25115269.scottish-salmon-farms-might-fined-millions-elsewhere/>

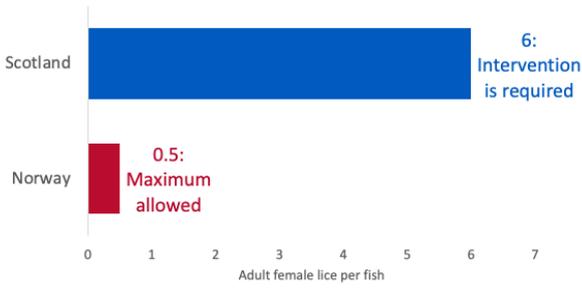
<sup>43</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-11-06-2025?meeting=16485&iob=140777>

<sup>44</sup> <https://www.soilassociation.org/news/2025/may/9/reforms-needed-for-farmed-salmon-soil-association-sets-out-timeline-for-change/>

<sup>45</sup> <https://www.parliament.scot/-/media/files/committees/rural-affairs-and-islands-committee/correspondence/2024/salmon-farming-letter-from-wildfish-scotland-12-november.pdf>

<sup>46</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-20-03-2025?meeting=16328&iob=139523>

**Appendix 1**

2018	2025									
<p>“The Committee considers the current level of mortalities to be <b>too high</b>”</p>	<p>Deaths in 2018 were 3.8 million, <b>rising to 10.9 million</b> in 2025.</p>									
<p>“It should be a <b>mandatory requirement</b> for all farmed salmon producers to provide this [mortality] data”</p>	<p>In 2025 the FHI discovered unreported “historic mortality” of over <b>400,000 fish across 27 different mortality incidents</b>. Since this remains a voluntary agreement only, the most the FHI can do is remind the farm that the Code of Good Practice states it should report mortalities.</p>									
<p>“The Committee does not underestimate the serious challenge which <b>gill health disease</b> presents to the industry. Indeed, it has difficulty in understanding how expansion of the industry can reasonably occur if this issue is not satisfactorily resolved”</p>	<p>There were 0.8 million deaths where gill health was mentioned as a reason in 2018; this <b>rose to 4.2 million</b> in 2025.</p>									
<p>“There needs to be far <b>greater transparency</b> in reporting mortality rates”</p>	<p>Mortality data remains <b>voluntary</b> and <b>excludes</b> animals who are <b>culled</b>, perish during the <b>first six weeks</b> of entering a sea cage, die during <b>transport</b>, and <b>‘cleanerfish’</b>.</p>									
<p>“Sea lice trigger levels should be challenging and set a <b>threshold that is comparable with the highest international industry standards</b>”</p>	<div style="text-align: center;">  <table border="1" style="margin: 10px auto;"> <caption>Sea Lice Levels Comparison</caption> <thead> <tr> <th>Country</th> <th>Level (Adult female lice per fish)</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>Norway</td> <td>0.5</td> <td>Maximum allowed</td> </tr> <tr> <td>Scotland</td> <td>6</td> <td>Intervention is required</td> </tr> </tbody> </table> </div> <p><i>Norway</i>  <b>0.2 adult female lice per fish during the sensitive spring migration period for wild salmon, with a stricter limit of 0.5 as a general maximum.</b></p> <p><i>Scotland</i>  Official action triggered at an average of <b>6 adult female lice per fish</b> (Intervention Limit), requiring reduction <b>below 2 per fish</b> (Increased Monitoring).</p>	Country	Level (Adult female lice per fish)	Notes	Norway	0.5	Maximum allowed	Scotland	6	Intervention is required
Country	Level (Adult female lice per fish)	Notes								
Norway	0.5	Maximum allowed								
Scotland	6	Intervention is required								
<p>“The Committee notes that <b>strict penalties</b> are in place in Norway to deal with escapes and recommends that appropriate sanctions should be developed and introduced in Scotland”</p>	<p>Still <b>no financial penalties</b> seven years later, despite the <b>largest escape</b> of farmed salmon in a decade taking place in 2023 (80,000 fish) and almost 75,000 escaping in open water following a storm in 2025.</p>									

	<p>Since 2018, <b>465,000 fish have escaped</b>; zero financial penalties.</p>
<p>“The Committee is aware that some of the larger salmon farming companies in Scotland are already operating under a stricter regulatory regime in Norway and suggests that they would have <b>little difficulty</b> in making a transition should stricter regulations come into force in Scotland”</p>	<p>In 2025, the Cabinet Secretary stated that further data collections would present significant <b>“burden” for producers and regulators.</b></p>
<p>“The Committee welcomes SEPA’s statement in its draft Finfish Aquaculture Sector Plan that it will apply <b>monetary penalties</b> to those who fail to comply with its proposed strengthened regulatory standards. The Committee considers <b>effective enforcement</b> with appropriate penalties to be of <b>significant importance</b> in ensuring the industry complies with regulatory standards. It is also of the view that this is a necessary requirement should the industry wish to <b>expand in a sustainable manner</b> without causing damage to the environment. The Committee notes that SEPA now has additional tools at its disposal to <b>raise revenue</b> through enforcement action”</p>	<p><i>Scottish Environment Protection Agency:</i></p> <ul style="list-style-type: none"> <li>● <b>118 non-compliances</b> at finfish aquaculture sites recorded between 1<sup>st</sup> April 2023 and 31<sup>st</sup> January 2025.</li> <li>● This averages to <b>one non-compliance every 6 days.</b></li> <li>● <b>No financial penalties</b> imposed on salmon farming companies.</li> </ul>
<p>“It notes that should other producing nations operate under significantly more <b>robust regulatory frameworks</b> designed to raise standards, this could provide them with an <b>advantage</b> in terms of provenance”</p>	<p><i>Culls, Post-transfer mortality, Under-threshold mortality</i> <b>Scotland:</b> Not reported. <b>Norway:</b> All salmon deaths reported.</p> <p><i>Diseases</i> <b>Scotland:</b> Some data available from mortality reports. <b>Norway:</b> Live data showing which sites have listed diseases.</p> <p><i>Lice counts</i> <b>Scotland:</b> Just the number of adult female lice reported. <b>Norway:</b> number of adult female lice, number of moving lice, number of attached lice all reported.</p> <p><i>Live lice data</i> <b>Scotland:</b> Reported 2 weeks later. <b>Norway:</b> Live data reported, as soon as the farm has submitted it.</p>

	<p><i>Non-medicinal sea-lice treatment</i> <b>Scotland:</b> Not reported. <b>Norway:</b> Thermal treatment, mechanical treatment and freshwater treatment all reported live.</p> <p><i>'Cleanerfish' used</i> <b>Scotland:</b> Not reported. <b>Norway:</b> Number used at the site, whether the fish in the production unit is wild-caught or farmed all reported.</p> <p><i>'Cleanerfish' deaths</i> <b>Scotland:</b> Not reported. <b>Norway:</b> All 'cleanerfish' deaths reported - broken down by 9 different causal factors.</p>
<p>"The Committee also recommends that information and <b>data on medicine use by the industry should be made publicly available</b>, on the same platform as that relating to sea lice and mortality rates"</p>	<p>There is <b>no freshwater medicine use information</b> that appears to be publicly available.</p>
<p>"The Committee notes the concerns expressed about the <b>transportation and disposal of dead fish</b>, and some members noted negative media reports on the matter"</p>	<p>Salmon were found <b>buried on a Scottish beach illegally</b> at Whiteshore Cockles. The company is used by Mowi, whose chief Operating Officer said: <i>"I will not condone it but I think they made a common sense decision to bury a small amount while the plant was down and incapacitated and hence once the plant was working then they went back to routine measures."</i></p>
<p>"It is of the view that <b>robust enforcement</b> of regulatory standards is absolutely essential if they are to meet their intended purpose"</p>	<p>"Due to Scotland's <b>'lax' regulatory system</b>, the Scottish salmon industry could have <b>faced millions in fines for non-compliances if the same incidents had occurred in other countries.</b>"</p> <p><i>Fish Health Inspectorate:</i></p> <ul style="list-style-type: none"> <li>● Increasing trend of non-compliances: 2021: 26; 2022: 29; 2023: 33; 2024: 55</li> <li>● More than one non-compliance per week recorded in 2024.</li> <li>● Over 100 incidents of excess mortalities not being reported and only discovered on later inspection. None resulted in any further action.</li> <li>● No financial penalties imposed.</li> </ul> <p><i>Animal and Plant Health Agency:</i></p> <ul style="list-style-type: none"> <li>● 2022 – 2025: 22 complaints of welfare abuses received from third parties, including FHI.</li> </ul>

	<ul style="list-style-type: none"> <li>• 20 complaints investigated; 12 resulted in verbal / written advice or a follow-up visit.</li> <li>• To our knowledge, APHA has never issued a formal warning letter, Care Notice or reported a case to the COPFS for consideration in relation to farmed fish.</li> </ul>
--	--

## **Appendix 2**

### **Mortalities**

In a letter to the Committee on 29th September, Salmon Scotland stated there had been: ‘Significant improvements in overall biological performance, fish growth, and productivity during 2025’ and ‘Record survival figures for January-August 2025 (92.3%)’.

As is typically always the case, the latter part of the year is when mortality figures surge, and 2025 has been no different. Salmon Scotland’s own figures show October 2025 was one of the highest average mortality rates ever recorded. But that average figure does not show the reality of the eye-watering losses some farms have suffered in 2025:

#### *Gob na Hoe (Loch Duart):*

- 583,942 died between September and November 2025 due to gill disease and jellyfish.
- 247,000 fish died in a single week.
- 45% died in October, 34% lost in November.

#### *Portree and Portree Outer (Bakkafrost):*

- Suffered 10 consecutive weeks of elevated mortality resulting in 620,615 dead from the Pasteurella bacteria.
- An investor earnings call revealed they had suffered 19% losses when the fish were first input into the farm, but this was not required to be reported to FHI.

#### *East of Papa Little (Scottish Sea Farms):*

- Catastrophic losses due to gill health issues meant the farm was forced to harvest all the fish at just 2kg.
- Half the fish on the farm died in a single week, over 120,000 lives.
- Salmon Scotland data shows the farm lost 66.3% of fish during November.

## **Appendix 3**

### **Lice**

Year	Average of Weekly Average AF
2022	0.50
2023	0.48
2024	0.42
2025	0.57

Source: [Historic sea lice data \(excluding current year\)](#) and [current sea lice data](#)