

Thursday 12th February 2026

Dear Members of the Rural Affairs and Islands Committee,

Further to our letter last month, we provide here a supplementary submission to support your ongoing inquiry into the Scottish salmon farming industry.

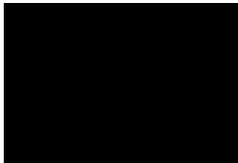
We appreciate that Committee Members are busy balancing a number of important projects and preparing for the dissolution in March, and that equally this topic remains a high priority area of focus following the extensive inquiries conducted over the past eight years.

With our two submissions we aim to provide assistance, clarity, and data-driven insights to ensure that your important work in scrutinising industry and regulatory progress in this space is as far-reaching, long-lasting, and impactful as possible.

To that end, in this letter, we provide:

- A summary of the Committee's pledged intentions when "*revisiting progress*" one year on;
- Some of the key updates over the past 12 months, relating to fish welfare, environmental impact, impacts on wild salmon, and consent / planning;
- An analysis of the timeline of implementation provided by the Scottish Government.

Yours faithfully,



Abigail Penny
Executive Director
Animal Equality UK



RAI Committee: Revisiting progress

Last year, the RAI Committee's report called on the Scottish Government to implement both the outstanding REC Committee recommendations, and its own recommendations set out in the 2024-2025 report, *"as a matter of urgency."*

The Committee asked the Scottish Government to set out a clear timetable for the implementation of these recommendations over the next year and that the response should set out information about how implementation would be measured.

The Committee stated that: *"it will be revisiting progress made on the issues raised in its report in one year and that it may make further recommendations on this issue at that time"*.

In light of the above, the Committee's responsibility at this stage appears to us to be a clear, narrow, highly focused, and important one, namely:

- 1) To assess whether the situation has **improved, worsened, or remained the same** across the **past 12 months**, since the 65 recommendations were re-released
- 2) To assess whether the Scottish Government has provided a **clear and urgent timetable** for the implementation of the many outstanding recommendations initially proposed back in 2018, and **how implementation would be measured**
- 3) To once again **revisit whether a pause on industry expansion is appropriate**, i.e. if a clear signal to the Scottish Government and industry is now needed to ensure further urgent progress is achieved and to move away from the ongoing 'status quo' since 2018

Paragraph 303 of the Committee's report refers to the industry's contribution to the economy, including GVA and employment. These are undoubtedly important and complex considerations in their own right. However, in relation to the specific questions currently before the Committee – as set out in its own report – they do not appear to be directly material to assessing progress against the recommendations specifically and the adequacy of the proposed implementation timetable.

The Committee's conclusions on those matters can, and we suggest should, be reached on their own terms. Consideration of impacts on workers, communities and the wider economy are all significant, but also distinct from the Committee's task in this inquiry, which arose specifically to examine progress and accountability in relation to the recommendations.

Assessing progress over the past 12 months

As outlined in our submission last month, we remain concerned over the lack of adequate progress made over the past year across the four key themes considered by the Committee. Some notable updates relating to the Scottish salmon industry of late include:

- **Fish health and welfare:** 2025 saw over 12 million on-farm deaths. Full mortalities are known only to industry and are not publicly reported (i.e. fish that die from culling, during transport, in the first six weeks of entering sea pens, and before reporting thresholds are met), despite the datasets being available for provision to accreditation schemes, investors, and inspectors.
- **Environmental impact:** Between January-September 2025, 26,935kg of formaldehyde was used by the salmon industry; September saw the highest use last year and was double that of September 2024 and more than five times the recorded levels in September 2023¹.

¹ <https://www2.sepa.org.uk/disclosurelog/> Ref Numbers F0200453, F0200640

- **Wild and farmed salmon:** 75k salmon escaped from Loch Linnhe in 2025. There were also 1,200 reports of farms over the Code of Good Practice lice limits last year², and nearly ¼ of active farms were over those same lice limits.
- **Consents and planning:** This week, consent was given for a planning proposal for Fish Holm – this would be the largest salmon farm in Scotland, despite the industry’s undeniable ongoing mortality challenges and the fact that the Shetland fisherman’s association objected due to a failure to account for potential impact of chemicals on nearby fish spawning grounds. The risks of displacement and cumulative spatial pressure placed upon other existing or potential inshore businesses should not be dismissed. Another site operated by Scottish Sea Farms, East of Papa Little, just 11 miles away from this proposed development, recently lost half the fish they had on the site in a single week, due to a catastrophic gill health related mortality event. This equated to the loss of over 120,000 fish³. The proposed Fish Holm site will be 243% larger than East of Papa Little.
- **Furthermore, the Committee specifically asked for “stronger [Government] leadership” and improvements to the “regulatory landscape”:** Scrutiny on farms continues to be alarmingly poor, with just two unannounced inspections reported in nearly three years, despite over 35 million deaths; none of the 20 worst-performing sites, which together accounted for more than 10m deaths, were inspected. Between January-September 2025, there were no recorded unannounced inspections⁴.

Views of the industry continue to be highly polarised, with a range of concerns expressed over the past 12 months by inshore fishing businesses, workers’ unions, economists, whistleblowers, locals, MPs and MSPs, animal advocates, conservationists, academics, and more. Public confidence into the industry will inevitably continue dwindling at pace until key challenges are addressed with the urgency necessitated.

Clear and urgent timetable

The Committee’s Convener admitted that the Scottish Government’s response to the report was “*more an update on progress, with minimal detail on the timescales*”.

Some comments or recommendations have been **openly rejected** by the Scottish Government:

- **Mortality reporting** - Paragraphs 76 and 77: requesting that comprehensive, consistent and transparent mortality figures be published, as well as an annual fish health report.
 - o *Note: It is inaccurate for the Scottish Government to argue that full mortality reporting would be a ‘burden’ to industry; full mortality data is provided in Norway and the industry records mortalities for other purposes using apps such as FishTalk for RSPCA Assured accreditation, for investors, and for inspectors.*
- **Assessing environmental and welfare risks** - Paragraph 260: requesting that the relocation of sites must be done with the full understanding of environmental and fish health and welfare risks
 - o *Note: it is inappropriate to rely so heavily on regulators and Crown Estate Scotland. Crown Estate Scotland recently confirmed via an FOI that no tenants have directly notified them of any salmon loss events over 25% during between January 2020 and December 2025, despite this being a clear lease requirement and despite 176*

² <https://www.thenational.scot/news/25834438.scottish-salmon-farms-breached-sea-lice-limits-1200-times-2025/>

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

⁴

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

production cycles in the same period suffering over 25% mortality (c. one-third of all production cycles). SEPA recorded 118 non-compliances at finfish aquaculture sites between April 2023 and January 2025 (one non-compliance every six days), but imposed no financial penalties. Similarly, between 2022 and 2025, APHA saw 22 complaints of welfare abuses from third parties, including FHI; 12 resulted in verbal / written advice or a follow-up visit, but 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.

- **Siting of farms** - Paragraph 237: proposing an immediate end to the siting of farms close to migratory salmon routes
- **Applying the precautionary principle** – Paragraph 275: requesting that the Scottish Government reviews planning and consenting guidance to ensure the precautionary principle and other guiding principles on the environment are applied
- While not rejected by Government, Paragraph 227 – relating to the delivery of **SEPA’s Sea Lice Risk Assessment Framework** – remains obstructed by industry, following 210 appeals to newly proposed lice controls.

Some comments or recommendations have been **partly rejected** by the Scottish Government **or not treated with urgency**. Where dates are provided, many commitments state that work will be carried out in 2026-2028 and, given the fact that the Government failed to act on the vast majority of the 2018 recommendations, we are not filled with confidence that these vague assurances or outlined dates will be adhered to.

While the Cabinet Secretary has committed to introducing official guidance, as outlined in our initial submission, we are sceptical of the impact of such a pledge when no details have been provided around the specific planned deliverables or associated time-frames, despite explicit requests⁵.

⁵ <https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6W-41271>