



## Atlantic Salmon Trust

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Finlay Carson MSP  
Rural Affairs and Islands Committee  
c/o Clerk to the Committee  
The Scottish Parliament  
Edinburgh  
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Dear Mr Carson,

29<sup>th</sup> May 2024

Thank you for your letter of 3 May requesting written views from the Atlantic Salmon Trust on progress made in relation to the recommendations in the Rural Economy and Connectivity (REC) Committee report on salmon farming in Scotland.

The Atlantic Salmon Trust considers that it is beyond doubt that wild Atlantic salmon and sea trout can suffer from the presence of open pen salmon aquaculture, due primarily to a combination of harm from sea lice infestations and interbreeding with farm escapees. These problems have severely impacted individual populations of wild salmon and sea trout, across their Atlantic range.

In this context, the Committee's Inquiry is timely for two reasons. First, in the latest species reassessment by the [IUCN Red List of Threatened Species](#), released in December 2023, wild Atlantic salmon have been reclassified from 'Least Concern' to 'Endangered' in Great Britain, as a result of a 30-50% decline in British populations since 2006 and a 50-80% projected decline between 2010-2025. Indeed, the Cabinet Secretary for Rural Affairs and Islands stated in 2022 in the forward to the [Scottish Wild Salmon Strategy](#) that 'there is sadly now unequivocal evidence that populations of Atlantic salmon are at crisis point.'

Second, the start of your Inquiry coincides with the Annual Meeting of the North Atlantic Salmon Conservation Organisation (NASCO). As a jurisdiction of NASCO, Scotland has committed to the [Williamsburg Resolution](#) and associated [guidelines and International Goals](#), that:

- 100 % of farms to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms; and
- 100 % farmed fish to be retained in all production facilities.

Scotland is not meeting these International Goals and urgent action is now required.

Whilst we acknowledge that some progress has been made, the Atlantic Salmon Trust is concerned about the lack of progress in key areas. We highlight the following recommendations as needing urgent action by the Scottish Government and its agencies to address the recommendations of the REC Committee.

1. Recommendation 3 relates to a moratorium on new salmon farm development and expansion of existing sites. Whilst the Atlantic Salmon Trust welcomes the implementation of the Sea Lice Management Framework it is concerned about the amount of time it has taken since the REC Committee Report to implement it. Furthermore, the Atlantic Salmon Trust considers that little substantive progress on managing escapes and disease interactions between farmed and wild fish, for both new and existing farms, has been made. In the light of the recent classification of wild Atlantic salmon as being endangered, the Trust would ask the Committee whether the protection of wild salmon is adequate and being delivered with an appropriate level of urgency given their status and obligations to meet international commitments through NASCO.
2. Recommendation 16 relates to reporting of sea lice loads on farmed fish and Recommendation 18 to monitoring and enforcement action. We welcome The Fish Farming Businesses (Reporting) (Scotland) Order 2020, which requires that sea lice numbers must be reported weekly. However, we are concerned about the number of times that no count is submitted. It appears that if businesses do not comply there is little, if any, investigation into the reason that no count was submitted. We suggest that the Fish Health Inspectorate should investigate robustly when repeated no counts occur from a particular business, and that this information is made public. This is important because these sea lice counts will inform SEPA's sea lice regulatory framework, which aims to protect wild salmonids.
3. Further, the [Scottish Government](#) has stated that 'Data is published to promote transparency', yet the [Scotland's Aquaculture website](#) is difficult to navigate and does not allow easy access to and use of the data. This must be improved. The Committee will be aware of the [Barentswatch](#) website, which by comparison, is a very clear and transparent portal for aquaculture data in Norway (see Recommendations 22, 23 and 24). To aid transparency this data should be held by the Scottish Government or one of its agencies.
4. In relation to escapes, Recommendation 37 from the REC Committee (and Recommendations 2.2, 2.7 and 2.8 and 2.9 from the [Report of the Salmon Interactions Working Group](#)) show no progress and must be prioritised as a matter of urgency. This is important because [Marine Scotland's](#) assessment of the influence of farmed salmon escapes on the genetic integrity of wild salmon (published in 2021) provides evidence

that 'introgression of genetic material from Norwegian farm salmon strains has altered the genetic composition of some populations within rivers near marine aquaculture production.' Genetic introgression is known to reduce the environmental fitness of populations and their ability to survive. With salmon now classified as endangered and this being a preventable impact it is now more important than ever to address.

5. The precautionary principle is cited numerous times in Recommendations 45-52, relating to the location of salmon farms. We would ask how the precautionary principle has been applied to the siting of existing and new salmon farms and what difference this has made to the impacts on wild salmon populations.
6. Recommendation 56 called for research into closed containment facilities and consideration of ways to incentivise the industry to explore further use of the technology. We would ask what progress has been made on incentivising the industry to explore closed containment technology, both with regard to marine pen farming to harvest technologies, and land-based production, as well as how the Scottish Government aims to support a transition towards closed containment? These technologies if implemented effectively would reduce the risks of both sea lice interactions and escapees providing greater compliance certainty for the aquaculture industry and protection of wild Atlantic salmon and sea trout.
7. Finally, although the Scottish Government has set up working groups, published reviews and strategies, the Atlantic Salmon Trust questions what real action has been implemented on salmon farms that has directly reduced the negative impacts of open pen salmon aquaculture on wild fish, in the five years since the REC Inquiry. This is even more important given the assessment that wild Atlantic salmon are now endangered in Scotland.

The Atlantic Salmon Trust looks forward to following the progress of the Inquiry closely and is happy to answer any questions that the Committee may have.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Bilby', written in a cursive style.

Mark Bilby  
Chief Executive Officer  
Atlantic Salmon Trust