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27 November 2024

Your ref: Committee - Salmon Farming Written Evidence Asks

Dear Finlay,

Request for written evidence from the Scottish Government following Rural Affairs and Islands Committee session on salmon farming in Scotland (13 November 2024)

I was pleased to attend the Rural Affairs and Islands Committee on 13 November 2024 and grateful for the opportunity to provide evidence on the Scottish Government's progress in responding to the recommendations in the Rural Economy and Connectivity Committee's session 5 report on salmon farming in Scotland.

During the session I committed to provide further information to you on the following points:

Information regarding the Animal and Plant Health Agency's (APHA) investigations and enforcement activities, including number of prosecutions and care notices issued

In its written evidence to the Committee, APHA provided a detailed account of the process it applies to the consideration of all farm animal welfare cases referred to it in general, beginning with whether a site visit is merited, through to referral for potential prosecution if this is deemed necessary. This framework applies across terrestrial as well as farmed fish situations. The evidence provides a description of the range of escalating actions it can take, depending on the severity of the issue being addressed and how well a producer responds in seeking to rectify a situation. The evidence provided was intended to offer insight into the range of actions available for APHA to deploy if necessary and was not intended to be definitive in terms of what actions have been taken to address specific farmed fish cases in recent years. It is worth noting that not issuing care notices or referring cases for potential prosecution indicates that, following investigation, these actions were not appropriate in the circumstances, either because there were no grounds for further action or because issues were addressed following prior action.

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The Committee has asked for measures of current activity of APHA inspectors, and how that will compare to future levels of activity following recruitment of additional inspectors into the area of fish welfare. Current activity is outlined in the table contained within the attached annex. Training in aspects of farmed fish production and health and welfare is underway for the new inspectors and includes accompanying Fish Health Inspectors on site visits. APHA have advised it has not yet determined a work programme for its fish veterinarians for the next financial year, but I do however wish to clarify that APHA inspectors do not exclusively operate in relation to fish farms, and there are not specific vets assigned to fish welfare work. Their expertise and time can be prioritised according to other key issues such as disease management in terrestrial food production as has been the case for Avian Influenza and Bluetongue. It is important to note that the number of routine visits undertaken by APHA is complimented by the routine visits undertaken by the Fish Health Inspectorate who alert APHA to any welfare concerns it has. The Scottish Government's Fish Health Inspectorate undertakes approximately 250 farm visits a year and, based on a consistent picture over recent years, less than 1 per cent of these visits result in welfare concerns being raised with APHA.

Data relating to the number of complaints and actions taken in the past three years was provided by APHA to Scottish Ministers in August and was relayed by my official in the Committee session. This information remains current at the time of writing and is provided in the annex with an additional column providing clarity on actions taken, including written advice and follow up visits provided by APHA.

Update regarding what further actions the Scottish Government will be taking in response to a 2020 report from NatureScot on cleaner fish

The report "*Assessing implications of wrasse fishing for marine sites and features*" commissioned by NatureScot is currently unpublished. The Scottish Government received a copy of it in 2024 and officials have asked NatureScot to confirm its publication plans.

As I explained to the Committee on 13 November, following receipt of the report we now intend to undertake an appropriate assessment ahead of opening the 2025 wrasse fishing season. Work is currently underway to progress the appropriate assessment and formal advice has been requested from NatureScot.

Clarify timescales on the revised technical standard for finfish aquaculture

The Committee heard that, in relation to interactions, we have been working to address the interactions between sea lice and farmed and wild fish as a priority, recognising the challenge raised by previous parliamentary committee inquiries and resulting in development and delivery of the sea lice risk assessment framework.

We remain committed to working with the sector to reduce the risk that fish escape from fish farms and we have funded further research to assess the evidence of the impacts of farmed salmon. We have to make careful prioritisation decisions in relation to what work is progressed when and we cannot commit at this stage to a firm timeframe for the implementation of an updated technical standard.

I will of course take very seriously the committee's view on the priority it believes should be placed on the technical standard but believe that the general decline in farmed fish escapes and the existing regulatory framework, including existing technical standard guidance, supports the prioritisation decisions we are taking.

Update on next steps regarding the Consenting Task Group including conclusion of the pilots and publication of their findings

Conclusion of the Pilots and Publication of their Findings

A new consenting process is being trialled in Shetland and Highland local authority areas which seeks to remove duplication and enhance multilateral engagement at the pre-application stage, a key focus within the independent review of aquaculture.

The single case flow process has three stages, broadly summarised as: provision of early joint risk and constraint advice, community and third party engagement and Joint Environmental Impact Assessment and Pre-application advice.

Pilot applications have been accepted from January 2024. To date, one pre-application pilot is near complete and three remain underway:

- Shetland
 - Fish Holm – Stage 3. Pre-Application pilot anticipated to be completed by end of 2024.
- Highland:
 - Hyskier – Stage 2
 - Loch Snizort West – Stage 2
 - 'Farm 4' - Stage 1 (information on this proposed development will become publicly available on SEPA's webpages following completion of stage 1)

Following the launch of the pilots, the Consenting Task Group has continued to meet to share feedback as part of an iterative review process.

We have also appointed an independent evaluator, Aquatera, to evaluate the success of each stage of the pre-application process. Aquatera will gather feedback from participants; provide an overarching assessment of the pre-application process; identify areas that could be improved; and consider the impact of the pilots on downstream application activities.

We expect a final evaluation report in Spring 2025.

Next Steps regarding the Consenting Task Group

Whilst the pre-application pilots are underway, the Scottish Aquaculture Council and the Consenting Task Group (CTG) share my ambition to go further. Earlier this year (June 2024) the Scottish Aquaculture Council agreed to two additional areas of work alongside the pilots:

1. Exploration of Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) processes, including:
 - Working to remove duplication: exploring the potential for regulators to adopt each others' HRA assessments and exploring the interaction of SEPA's environmental risk assessment and EIA
 - Working to ensure that EIA is targeted (considering issues scoped into EIA)
2. Following existing pilots through the onward application process: developing a case flow blue print which extends alignment of SEPA and planning processes beyond pre-app, where possible.

In relation to the pre-application pilots (and conversely also other work to improve other application processes), we are limited in our ability to deliver, evaluate, repeat and adopt new processes by the number of forthcoming applications and time required to complete the pilots.

So far, all development proposals in the Highland and Shetland regions have opted into the pilots, resulting in 4 pilots commencing this year. However, each of these will stagger in their completion and, depending on the results of the independent evaluation, the CTG may:

- decide that further pilots are required in Shetland and Highland; or
- decide that the process should be trialled in an additional local authority area; or
- decide that the process is adopted across Scotland

It is therefore not possible at this juncture to be definitive regarding the end date of this change project. However it is my ambition to ensure Scotland-wide improvements are adopted by Spring 2026 and I also remain committed to ensuring that changes for the benefit of all are rolled out as quickly as possible. In other words, we do not intend to wait for all work strands to complete if changes to practice are demonstrably beneficial and are working well.

I appreciate the interest of Committee and other stakeholders in this work and I am happy to keep you updated, particularly on the outcomes of the evaluation exercise and the next steps.

Mortality rates covering the period 2009-2024

Data on farmed fish losses are collected and published by multiple organisations for different regulatory purposes and cannot be directly compared due to their methodologies. The number of fish in a year class (i.e. the fish grown to harvest within a production cycle) varies between years, and therefore expressing losses as a percentage of input within a year class (i.e. survival to harvest) provides the best basis for long term comparison of sector-level losses in comparison to other data sets.

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Figure 1 illustrates survival of smolts to harvest within sea water production cycles by each year class. Survival to harvest is published annually in the [Scottish Government's finfish production survey](#). The most recent survey published in 2023 showed the survival of smolt to harvest of the 2021 year class, which is the last year class for which the production cycle has been completed and data collated.

As well as mortality, losses also consists of fish which have escaped, been culled for production reasons, removed for sampling purposes, statutory culls or selected for broodstock production.

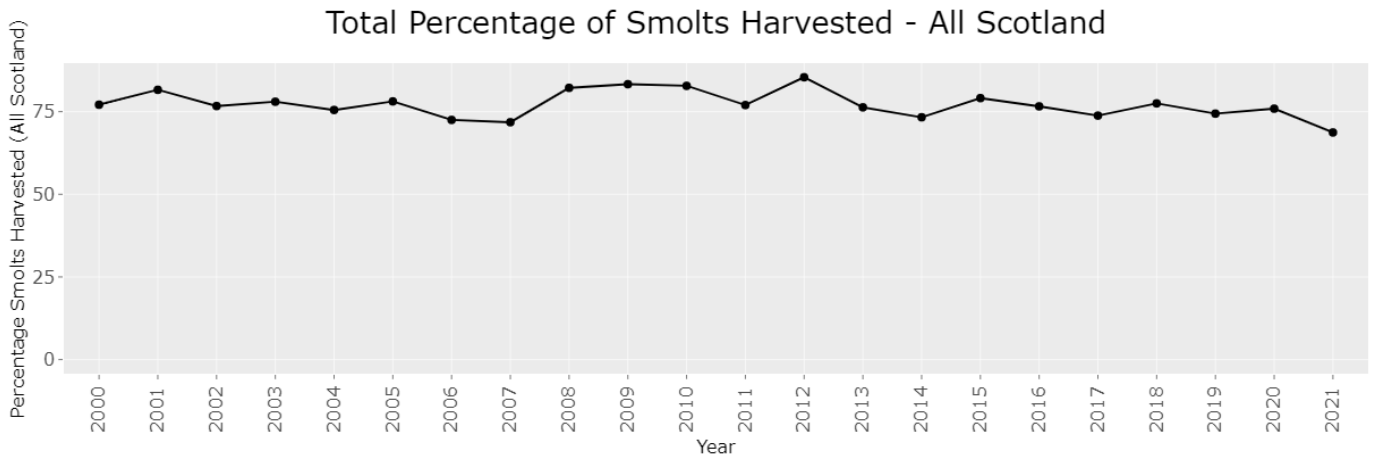


Figure 1: Total Percentage of smolts surviving to harvest (2000-2021). Data source: [Scottish Aquaculture Production Surveys \(shinyapps.io\)](#)

Figure 2 illustrates monthly mortality data for the farmed salmon sector, taken from Salmon Scotland's website over the period 2018-2024. The graph presents data for the best and worst year within that time period, including 2023 which tracks the worst year and 2024 which tracks the best year. However, it should be noted that the data for 2024 is not yet complete.

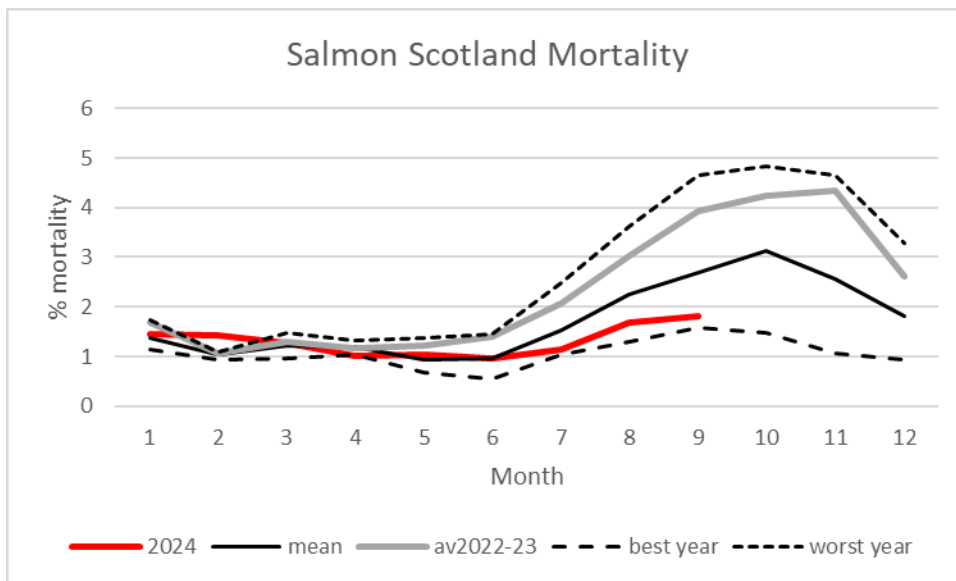


Figure 2. Monthly mortality levels based on data published on Salmon Scotland website.

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I hope that the information I have provided is helpful to the Committee's ongoing considerations with respect to the committee's follow-on enquiry into salmon farming in Scotland.

Yours sincerely,



MAIRI GOUGEON

Data relating to the number of complaints and actions taken in the past three years, provided by APHA

Year	No of routine inspections	No of complaints received	No of complaints investigated	How many resulted in action taken?	Action taken	Comments
2022	-	4	3	2	1 verbal advice, 1 written advice	Discussion with operators to summarise findings at inspections, and agreement on specific actions for improvement. Letter provided summarising findings from inspections and agreement on specific actions for improvement within this and future crops.
2023	5 routine harvesting inspections	12	11	7	4 written advice, 3 follow up visits undertaken	As above for written advice. Follow up visits are carried out to assess whether agreed actions have been successfully implemented to improve situation on site.
2024	1 routine harvesting inspection*	6	6	3 under investigation		

*resources were diverted in 2024 to support action on Avian Influenza.