

Salmon Scotland – a sector response to the Rural Affairs & Islands Committee (RAIC) Report on Salmon Farming in Scotland

13th March 2025

Introduction- the need for a balanced approach to sustainable growth

- When the Rural Affairs & Islands Committee (RAIC) initiated an inquiry (April 2024) into salmon farming, the sector welcomed this as an opportunity to bring forward fresh thinking with streamlined recommendations that support the sustainable development of this vitally important Scottish sector. We are unconvinced that 41 new recommendations adding regulation, bureaucracy, cost and complexity help towards that goal.
- Since the Report's publication in January, *Organic Sea Harvest* based at Staffin, Skye has ceased trading. The only recent new start salmon production business has been stopped by bureaucracy, red tape and the regulatory burden. 20 jobs will be lost, with further significant impacts on the supply chain. Decisions by policy makers and Government quangos have consequences for people, their jobs, and local communities around Scotland.
- One salmon company – Loch Long Salmon – still awaits a determination decision by Scottish Ministers. This has taken more than 12 months. Business would rather a no, than for decisions to take years.
- The sector is disappointed that anti-salmon farming campaign groups – Wildfish, Coastal Communities & Animal Equality UK – whose organisational objective is to close down the sector and put thousands of people out of work, were not questioned by the Committee on their motives. Their evidence needs to be recognised in that context.

Business concerns with the RAIC Report

From a salmon business standpoint, elements of the RAIC Report potentially threaten the sector's stability and future growth.

1. Economic Contributions Overlooked:

- The Report failed to give adequate consideration to the significant economic contribution salmon farming makes to Scotland in the most remote and economically fragile locations. 2300 supply chain companies support production – these are based in every Scottish parliamentary area.
- Recent UK Government trade statistics illustrate that 100,000 tonnes of Scottish salmon was exported to 48 countries around the globe worth £844m in 2024. Scotland ranks third globally in terms of Atlantic salmon production and produces six per cent of global production. Deputy First Minister Kate Forbes said, "*These exceptional figures clearly demonstrate the surging global demand for Scottish salmon, which is rightly recognised as*

a premium high-quality product. The farmed salmon sector is very important to our economy, providing well paid, high skilled jobs in Scotland's rural and island communities." Scotland Office Minister Kirsty McNeill said: "Salmon is the jewel in the crown of Scotland's world-class produce and today's figures underline its global reputation for unrivalled quality."

- Scotland's salmon companies compete with Norway, Faroes, Ireland and other producing nations. Making business more difficult by proposals for greater regulation makes Scotland a less competitive international business environment. **Our principle is very simple: we do not want less regulation; rather, we want better and more streamlined regulation.**¹ A Scottish Growth Commission has just been announced (7th March) co-chaired by Scottish & UK Government Ministers. The sector welcomes this. Growing salmon, growing Scotland.

2. Regulatory uncertainty and business viability:

- The Report recommends filling perceived regulatory and enforcement gaps without recognising the business impact of increased regulation. That business impact is demonstrated by the loss of Organic Sea Harvest in Skye. Recommendations for stronger regulatory powers including for the Fish Health Inspectorate, would create an unpredictable operating environment. Salmon production companies require robust, high quality and evidence-based regulations that support long-term investment.
- The Committee has placed undue focus on a precautionary approach. Overuse and misuse of the precautionary principle was raised in the Griggs Review of aquaculture consenting in 2022. Professor Griggs recommended Adaptive Management in place of inherent, and unjustified, over-precaution. It is disappointing that the Committee did not highlight the Griggs recommendations for aquaculture regulatory reform.

3. Mortality focus without recognising Sector investment:

- Scotland's salmon farmers are the only farm sector in the UK to voluntarily publish farm level mortality data. When other sectors experience health challenges, such as avian flu or foot and mouth disease, MSP's rightly demand government support. When salmon farmers face threats to fish health and survival we do not hear the same calls and instead note a Committee Report recommending further ratchetting of business regulatory controls.

The Report cites the high mortality rates in salmon farming as a critical concern. However, it fails to adequately reflect the £1 billion investment since 2018 to improve fish health through technology, research and innovation. Since 2018 this spend on technology, innovation and research has greatly improved fish health.

In the sector's evidence (2nd October) we demonstrated this significant improvement in fish survival, as well as record low levels of sea lice.

¹ As per evidence provided by Tavish Scott to the Rural Affairs, Islands and Natural Environment Committee; Meeting date: Wednesday, September 15, 2021; [Column 15 of the Official Report](#)

Recently published government statistics re-iterate this position. The Report did not cite this evidence provided by the sector and Scottish Government regulators.

- The Report demonstrates a lack of understanding of fish mortalities, how they are managed, levels of transparency by salmon farmers and the regulatory oversight of the sector. The Fish Health Inspectorate (FHI) already have strong powers on fish mortality, including powers to close farms if they have significant concerns. There was no evidence presented to the Committee to suggest FHI are not exercising their powers effectively.
- There is a significant volume of mortality data in the public domain. Claims that mortality data is “confusing” is led by anti-salmon farming campaigners. The Report’s recommendation for reporting more data, over and above what is already published, will only serve to further confuse. Furthermore, the Committee did not assess the inevitable added costs and burden on business and regulators.

4. Expansion moratorium - A missed opportunity for growth:

- The report considered but did not endorse a moratorium on new farms and expansions. While this is a relief for salmon businesses, the very discussion of such restrictions introduces business uncertainty, which deters investment. Instead of limiting growth, the sector had hoped RAIC would endorse sustainable expansion strategies that balance economic, environmental and social interests. Sustainable economic growth has broad consensus across all major political parties and is explicit in the Scottish Government’s Aquaculture, Blue Economy and Export strategies.
- The Committee failed to recognise the role and importance of third-party accreditation and retailer-led audit schemes, including to public accountability of the sector. Retailers specifically require many of these standards as a prerequisite of purchasing contracts. They are effectively mandatory if a salmon production business wishes to be successful.

5. Climate change adaptation needs business-driven solutions:

- The RAIC Report briefly mentions climate challenges such as rising sea temperatures and jellyfish blooms. These have severely impacted salmon populations. Climate change affects all farming systems, livestock and arable.
- Rather than further regulation, we look to government-sector innovative collaboration to develop solutions, such as advanced monitoring systems, offshore farming opportunities through site consolidation and supporting a replacement Research and Innovation funding model, following the withdrawal of funding for the Sustainable Aquaculture Innovation Centre (SAIC). Many of these reforms were proposed by the Griggs Report (February 2022).
- The Committee noted disappointment regarding the lack of progress in actioning the recommendations of the Salmon Interactions Working Group (SIWG). We that were to be implemented together.

- The sector supports the implementation of the Scottish Technical Standard on fish escapes. Penalties associated with escapes form a recommendation within the SIWG report, which the sector endorses.
- The Report recommends more research on the impact of salmon farming on wild salmonids. We welcome the Scottish Government's appointment of a new Chief Scientific Advisor, Marine and his work on marine science. There is already extensive science which has failed to demonstrate a significant impact. SEPA's Sea Lice Risk Assessment Framework can provide a clear, robust, regulatory mechanism through which any potential impacts can be regulated.
- The Report recommends that there are no new sea farms sited on migratory routes of wild salmon. This fails to recognise that SEPA's Sea Lice Risk Assessment Framework will cover migratory routes. Despite clear evidence and some committee questioning, the Report failed to acknowledge the sectors investment in sea lice management, which has led to historically low lice levels and therefore further reduces risk to wild salmon populations.
- The Report recommended stricter controls on a farmer returning a no count for sea lice. Salmon farmers only ever return a no count for lice if performing that count would be unsafe for staff, would impact fish welfare, or would lead to potential risks to consumers. These reasons are all governed by legal controls. More regulation would place unnecessary pressure on farmers compliance with health and safety, animal welfare and food safety legislation.
- The Report does not recognise the important role that medicines take in all forms of livestock production, pet ownership and for human health care. Significant regulations controlling how medicines are licenced and used exist. These controls are specifically designed to ensure the environment is not unduly impacted, with high margins of safety included. Claims by anti-salmon farming campaign groups of significant environmental impact are unsubstantiated by data and evidence.

Conclusion: The need for a balanced approach

- The RAIC Report demands that Scotland's salmon sector must continue improving. Our sector has evolved, developed and improved throughout its history. Therefore, we accept the challenge of consistent improvement and highlight the £1 billion investment in fish health and welfare since 2018, and the latest sector performance on mortality and sea lice levels.
- Rather than disproportionate enforcement and ever more regulation, public policy should focus on fostering innovation, supporting investment, and creating a robust regulatory framework that provides certainty and stability for Scotland's world-leading salmon sector.

