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13 March 2025

Dear Finlay,

Scottish Government Response to the Rural Affairs and Islands Committee report on 'Salmon Farming in Scotland'

In advance of the planned Rural Affairs and Islands Committee debate on 20 March, I am pleased to provide you with the Scottish Government's response to the Committee's follow up report on 'Salmon Farming in Scotland'.

I look forward to discussing these issues with Committee members next week.

Yours sincerely,

MAIRI GOUGEON

Scottish Government Response to the Rural Affairs and Islands Committee report on 'Salmon Farming in Scotland'

March 2025

I am grateful for your Committee's detailed consideration of important issues in relation to salmon farming in Scotland.

In 2022, salmon farming production generated £324 million Gross Value Added (GVA), 7% of the Scottish marine economy GVA[1]. Our Vision for Sustainable Aquaculture[2], published in July 2023, sets out the Scottish Government's ambitions for the sustainable development of the aquaculture sector, operating within environmental limits, and recognises the considerable social and economic benefits the sector delivers today and can deliver in the future. The industry's work to produce the UK's largest food export contributes significantly to our economy, particularly in rural and island areas, with around 2,200 directly employed staff[1] and many more in the supply chain. Scottish salmon remained the UK's top food export in 2024, hitting a record high of £844 million. The bulk of salmon production takes place in our highlands and islands, providing high value, high skill, long term employment opportunities that contribute to the ongoing vibrancy of those communities.

I know the Committee shares my view, set out in the Vision, that such economic benefit must not be at the expense of our environment. Our strong regulatory framework already provides important safeguards necessary to preserve our environment now and for the future. I therefore welcome this opportunity to set out key next steps in our shared agenda of safeguarding the sustainability of salmon farming in Scotland, building on our successes to date.

As I set out in my remarks to the Committee in November 2024, we have made considerable progress since the Rural Economy and Connectivity Committee's report in 2019. Despite the emergency response demands resulting from the management of Covid and EU Exit, we have delivered powerful action across priority areas such as protection of the environment and biodiversity, consenting, community benefit, and animal health and welfare.

I summarised key activity since the original report by the Rural Economy and Connectivity Committee in 2019 at my evidence session with you in November. I established the Scottish Aquaculture Council to co-ordinate work towards a sustainable future for the sector and my officials have convened the Consenting Task Group (CTG) to improve consenting process. The CTG has developed and piloted a new pre-application consenting framework which coordinates regulatory activity early in the development process, without compromising environmental safeguards or community engagement. This is being evaluated, with activity to embed and build on

[1] Scotland's Marine Economic Statistics 2022 - gov.scot
[2] Vision for sustainable aquaculture - gov.scot

this learning to come this year, as set out in our Programme for Government. This will include acting on our recent consultation to extend Scotland's marine planning zones to put in place the framework to permit development beyond 3 nautical miles, in addition to progressing spatial planning through implementation of National Planning Framework 4 and development of Regional and National Marine Plans.

On environmental impacts and wild salmon interactions, work has progressed on over fifty actions as described in our Wild Salmon Strategy Implementation Plan[3]. In February 2024, the Scottish Environment Protection Agency (SEPA) commenced the implementation of a new Sea Lice Risk Assessment Framework. All active farms have been transferred to SEPA's new, strengthened, environmental regime, and we will introduce a new Environmental Quality Standard for emamectin benzoate in June 2028 ensuring use of this medicine stays within the UK Technical Advisory Group (UKTAG) recommended limits.

On fish health and welfare, as outlined in their evidence to the Committee, the sector is investing heavily to address fish health challenges, which are complex and changeable. We have introduced mortality reporting, mandatory sea lice reporting, and we have lowered sea lice intervention levels for farmed fish health following session five's recommendations. Average sea lice levels in Scotland are the lowest they have been in recent years as a result[4].

Salmon Scotland recently wrote to the Committee[5] to set out their mortality data indicated survival across all marine farms was 82.3% in 2024, up 10 percentage points from 72.3% in 2023. This is a positive indication that investment and attention from both Government and the sector in this fundamentally important area is paying off, although I am clear that we will continue to work closely with the salmon sector and innovation and science communities to ensure that driving improvement remains a core focus.

We continue to invest in developing our science and evidence base – for example progressing collaborative science to develop sea lice models and publishing Scotland's first national assessment of genetic introgression. We are supporting innovation through the Marine Fund Scotland which has awarded over £4.5 million to aquaculture innovation projects, which will enable over £17 million of investment across the sector in 2024/25.

Together with the Scottish Funding Council, we are providing £1.5 million for the Sustainable Aquaculture Innovation Centre, primarily focused on applied fish health innovation, to 2026. Establishing successor arrangements for financing aquaculture innovation is a key priority for 2025-26.

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[3] Wild salmon strategy: implementation plan 2023 to 2028 - gov.scot

[4] Based on an analysis of Fish Health Inspectorate sea lice data, available here.

[5] Salmon farming 3 February 2025 | Scottish Parliament Website

Since the original report, we have appointed Professor Mark Inall as our Chief Scientific Advisor (Marine). Professor Inall's appointment, along with our Marine Science and Innovation Strategy published in January 2024, demonstrates our continuing commitment to science and evidence as the fundamental foundation to all our marine and freshwater policy work.

Government of course must ensure public funds are always directed towards the highest priority outcomes – even more so in challenging economic circumstances such as we have experienced since the end of the Covid-19 pandemic. The Marine Directorate continues to prioritise activities to ensure the Scottish Government discharges its statutory and regulatory responsibilities and undertakes policy initiatives across aquaculture and other areas aligned closely with this Government's strategic outcomes of eradicating child poverty, growing Scotland's economy, tackling the climate emergency and improving Scotland's public services. This response sets out the definitive actions we will take forward on the Committee's recommendations, making clear what progress we anticipate within the next twelve months across a range of reports and recommendations affecting the economy, fish health and welfare and the environment.

I welcome the opportunity to set out this workplan for salmon aquaculture and to provide this clarity to the Committee, Parliament and stakeholders.

Response to recommendations

This section sets out the Scottish Government's response to the recommendations in the Committee's report. Recommendations are referenced by the relevant paragraph numbers. Recommendations have been grouped where response actions are related. A summary of the Scottish Government's commitments and indicative timeframes is included in Annex A. The Committee has asked how implementation and progress is to be measured. Beyond this response, I will update Committee on our activity in the autumn and ensure members remain sighted on key developments.

1. Information Management and Data

Paragraph 76. The Committee recommends the Scottish Government must publish comprehensive, consistent and transparent mortality figures that include the number of fish at a farm, the freshwater mortality and seawater mortality, per facility, with accurate numbers of dead salmon, wrasse and lumpsuckers per week and with cumulative mortality totals at the end of each cycle.

Paragraph 77. The Committee recommends the Scottish Government publish an annual fish health report detailing the health and welfare status of all farmed aquatic finfish, including wild caught wrasse, in Scotland.

Paragraph 78. Given the concerns raised in evidence relating to the Fish Health Inspectorate information, however, the Committee supports the REC Committee recommendation for mandatory reporting of mortalities to the Fish Health Inspectorate.

Paragraph 124. The Committee notes the development of the Scotland's Aquaculture website and the consensus that the suite of data called for by the REC Committee is now publicly available. The Committee also, however, agrees with the frustration expressed by stakeholders that the website is difficult to navigate, and information is not presented in an easily understandable format. The Committee is not satisfied that an explanatory document will wholly address these concerns and recommends the Scottish Government prioritises upgrading and improving the Scotland's Aquaculture website to make data more accessible and user friendly.

The Committee notes the REC Committee's view that the costs associated with developing the suite of data should be borne by the industry and that it called on the Scottish Government to discuss with industry representatives how this might be achieved. This Committee recommends that the Scottish Government takes forward recommendation 24 as soon as practicable.

Response

More data are collected and published with respect to salmon farming in Scotland than salmon farming in other jurisdictions and in comparison to terrestrial farming sectors. Further data collections would represent significant burden for producers and regulators; we do not believe this burden would be balanced by a sufficiently high benefit given there is already so much data available, neither do we believe it is necessary to mandate any further collections through legislation given there is no evidence of non-compliance. Data already available are sufficient for transparency and regulatory purposes. Ministers are committed to supporting the New Deal for Business, which requires such justifications for additional business burdens.

However, we do recognise improvements could be made in terms of how the existing data are arranged and explained to enable the best use of the large volume of information available and support transparency for stakeholders of all interests. We will take forward work to explore how the presentation and accessibility of existing data collections can be improved. We acknowledge that Scotland's Aquaculture Website requires modernisation and will work with partners to scope out how it can be refreshed to enhance transparency. We will also explore how to finance such a project, including collaborating with the sector where appropriate. We will also explore how to gain greater insights into cleanerfish health and welfare outcomes as part of our overall response to the Committee's report and delivery of our Vision for Sustainable Aquaculture. We will take forward scoping work within 2025-26, anticipating that implementation (especially of the website) will take longer.

2. Fish Health, Welfare and Cleanerfish

Paragraph 58. The Committee recommends, therefore, the Scottish Government provide powers to the Fish Health Inspectorate (or another appropriate body) to limit or halt production at sites which record persistent high mortality rates.

Response

Analytical work is required to understand how sites with 'persistent high mortality' manifest. If analysis shows some sites maintain high mortality year to year, further consideration will be needed to ascertain if the mortality incidents are related and are indicative of insufficient action by the producer to mitigate issues. Given the high commercial incentive for farmers to put mitigating actions in place at sites where mortality has been significant, we do not expect there to be many farms which would meet such a bar. However, we accept that without analysis that cannot be known for certain.

We will therefore undertake this analysis based on available data, exploring thresholds for 'persistent high mortality', and explore with the sector and

stakeholders what actions are already taken by producers to prevent issues causing mortality persisting from year to year.

Paragraph 94. The Committee recommends the Scottish Government bring forward additional regulations and official guidance under the Animal Health and Welfare (Scotland) Act 2006 Act in order to set specific baseline standards for the welfare of farmed fish. This should dovetail into the upcoming review of industry's Code of Good Practice to ensure this provides adequate guidance on how statutory requirements should be achieved. The Committee also recommends official guidance must take account of industry's need to balance treating their fish in order to meet regulatory standards for sea lice with the potential unintended consequences this may have for fish health and welfare.

Response

The totality of the provisions, which include robust legislation, policies, and operational practices, already safeguard the health and welfare of farmed fish and we are already exploring the potential for Scottish Government guidance on welfare at time of slaughter for farmed fish. A strong Code of Good Practice for Scottish Finfish Aquaculture already provides key production standards, against which much production is independently audited. In addition, various accreditation schemes contribute significantly to improving fish health and welfare by continually progressing welfare provisions.

There could be a number of ways in which to progress standards for farmed fish welfare and various ways this could be reflected in legislation. We will undertake an analysis of options, including statutory options and alternatives, to fully explore what benefits each would offer and determine how welfare standards could be best set out. We expect this options appraisal to be completed ahead of the proposed September update to the Committee, and we will set out next steps at that point.

Paragraph 111. The Committee recommends the Scottish Government introduce stricter conditions on the accepted reasons for no counts with regards to stock that is subject to treatments and being held for harvest and that it updates relevant guidance and enforcement approach accordingly.

Response

This issue has already been addressed, following concerns raised in 2022 regarding 'no count' being presented as an alternative to submitting sea lice levels under The Fish Farming Businesses (Reporting) (Scotland) Order 2020. The Fish Health Inspectorate modified its data monitoring procedures and raised examples of inappropriate practice with sector representatives and individual companies, making it clear similar practice will not be tolerated in future. However, for the avoidance of doubt, the Fish Health Inspectorate will ensure there is absolute clarity in published guidance around the parameters which apply to the use of 'no counts'. Statutory

enforcement procedures are already robust, and change will not be required following clarification of appropriate practice.

Cleanerfish/Wrasse

Paragraph 139. The Committee recommends the Scottish Government publish the University of Glasgow report commissioned by NatureScot as a matter of urgency. The Committee recommends the Scottish Government provide the further advice it is expecting from NatureScot and to publish the results of the Scottish Animal Welfare Commission review at the earliest opportunity and notify the Committee when that takes place.

Response

Scottish Government has not yet had formal receipt of either of the final reports referred to and does not have direct control of the publications. We understand NatureScot is in the process of publishing the University of Glasgow report.

The Scottish Animal Welfare Commission is independent from Scottish Government and although Scottish Government provides a publication mechanism for its output it is not in control of its delivery timelines. We have asked for progress updates and will notify the Committee when the reports are published.

Paragraph 140. The Committee is deeply troubled by evidence that suggests NatureScot waited four years before alerting the Scottish Ministers about the report's findings. Given the potential impacts from this delay, the Committee requests NatureScot and the Scottish Government provide urgent clarification to the Committee on this matter.

The delay in notifying Scottish Ministers of the report is unfortunate. We received the report in 2024, which helped to inform next steps and our commitment to undertake a Fisheries Assessment (Habitats Regulation Appraisal and Appropriate Assessment) prior to a 2025 fishery. Exchanges between the Scottish Government and NatureScot between 2019 and July 2024 regarding wrasse are published online. Carrying out the Fisheries Assessment is a priority for the Scottish Government.

In addition to the wrasse specific fisheries assessment noted above, as part of implementing fisheries management measures for the inshore region, fisheries assessments are being undertaken for all the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and the Nature Conservation Marine Protected Areas (NCMPAs) where these measures are required in line with Conservation and Management Advice (CMA) provided by NatureScot. Whilst wrasse is not a protected feature of any designated sites, these assessments will highlight if fisheries management measures are appropriate, and that the measures put in place ensure fishing activities do not negatively impact the conservation objectives and protected features of designated sites.

Paragraph 141. In addition, the Committee was assured by the Cabinet Secretary during its recent consideration of the amendments to the Joint Fisheries Statement that the Scottish Government could develop a fisheries management plan or take other action to protect a fish stock. The Committee notes the current petition PE2110 calling for a fisheries management plan for wild wrasse. Depending on the further advice it is expecting from NatureScot and the results of the Scottish Animal Welfare Commission review, the Committee recommends a fisheries management plan or other protective action should be developed as soon as practicable to ensure any wild wrasse are harvested sustainably.

Response

The Fisheries Assessment that the Scottish Government is undertaking, based on advice from NatureScot, will ensure appropriate protective measures for wrasse are in place. A Fisheries Management Plan (FMP) is not required for this purpose and the Scottish Government has been clear our resources are currently focussed on delivering the statutory commitment in The UK Fisheries Act and UK Joint Fisheries Statement for the production of 43 FMPs, of which the Scottish Government is the lead coordinating authority for 22. We are unable to confirm, or commit to, the production of additional FMPs beyond those currently in development. We have, however, also commissioned the Sea Fish Industry Authority to undertake some initial scoping work to help inform our approach to non-quota species (which includes Wrasse) FMPs in Scotland.

3. Science and Innovation

Paragraph 57. The Committee recommends the Scottish Government establish a research project focused on testing and improving the modelling of environmental conditions that are known to cause high mortality events on salmon farms. This research should aim to explore improvements in the capability to predict such events to provide early warning to industry and inform technological solutions and approaches to husbandry to mitigate high mortality events. This research should also consider whether the current collection and monitoring of environmental conditions around salmon farms is sufficient for computer modelling purposes and identify potential for improvements. The Committee asks the Cabinet Secretary to set out a timetable for establishing this research project in her response to this report.

Response

Research has been undertaken into aspects of climate change that impact salmon farming in Scottish waters, and the Committee is right to recognise this most impactful and important aspect of securing the sustainable future of salmon farming

in Scotland. The Farmed Fish Health Framework (FFHF) steering group has already identified four key priority risks for salmon mortality, all of which have a degree of relationship with changing climatic conditions. These are anoxia, harmful algal blooms, micro jellyfish (a subset of zooplankton), and amoebic gill disease. Projects have been undertaken in all these areas, including several by the Sustainable Aquaculture Innovation Centre (SAIC) funded by the Scottish Government.

Further research on these issues is a priority for the sector and for the Scottish Government who both provide funding and direction in multiple ways. We do not believe a single dedicated research project owned by the Scottish Government will be the most appropriate and effective way of ensuring that the anticipation and mitigation of climate harms affecting salmon aquaculture is a core focus of scientific endeavour across all the relevant scientific work in Scotland and beyond.

The role for Government continues to be to act as an enabler, to support collaboration, communication and direction to aid the development of a complete and coherent research programme across the academic and salmon producer communities. We continue to do this through the FFHF Steering Group, the collaboration within Marine Alliance for Science and Technology Scotland (MASTS), and via the Sustainable Aquaculture Innovation Centre (SAIC) consortium and networks. We will engage with the Chief Scientific Advisor (Marine), Professor Mark Inall, and ensure these aquaculture priorities are factored into the strategic approaches to marine science under his leadership, including through implementation of our Marine Science and Innovation Strategy, and as part of the ongoing scoping exercise for Areas of Research Interest, to identify and enable research priorities and knowledge transfer to key communities of interest.

Following the withdrawal of funding for SAIC by the Scottish Funding Council in 2023, we put in place transition arrangements and funding to maintain support for applied innovation work focused on solutions related to these fish health concerns. We are in the process of designing and implementing successor arrangements, to be in place when SAIC transition arrangements run out in 2026, which will ensure there remains a mechanism through which aquaculture innovation projects can be coordinated and funded. We will ensure the design and governance of these arrangements facilitate ongoing engagement with the challenges that climate change brings to the salmon farming and other aquaculture sectors.

Paragraph 160. The Committee recommends the Scottish Government continue to support monitoring, data collection and research to improve the understanding and assessment of the impact of discharges on the marine environment. The Committee also recommends that the Scottish Government prioritise supporting SEPA in the development of techniques to accelerate the analysis of seabed survey samples as a matter of urgency and ensures SEPA has sufficient expertise and capacity to analyse seabed samples.

Response

SEPA and fish producers have been collaborating on a research project supported by the Sustainable Aquaculture Innovation Centre to develop the use of DNA to assess seabed impacts. DNA-based monitoring enables much faster analysis of environmental samples than conventional techniques.

The option for using DNA based monitoring was introduced by SEPA in 2022. The second phase of DNA development is due to deliver in the next few months. Following completion of phase 2 and a review of increased data sets, SEPA hope to be able to extend the scope (the number of farms where DNA monitoring is suitable) of DNA-based monitoring by the end of 2025. Discussions are on-going about a third phase of the project, including how funding could be secured.

SEPA is also collaborating on separate research projects aimed at using imagery and Artificial Intelligence to assess impacts on otherwise difficult to assess seabed types. These are currently being trialled at a number of farms.

Scottish Government remains committed to facilitating, where possible, innovative projects like these which can make a real difference and deliver on blue economy ambitions. We have previously supported work on eDNA through our Marine Fund Scotland and the co-coordinated Agenda for Marine, Environment and Rural Affairs Science Partnership and Rural and Environmental Science and Analytical Services.

Paragraph 161. The Committee recommends the Scottish Government work with industry and academia to establish dedicated research pens. The Committee also recommends that industry should contribute to the cost of financing this infrastructure.

Response

We have discussed the concept of innovation sites with the sector on several occasions and SEPA is committed to discussing and understanding any proposals for research pens in Scotland. In principle, we are in favour of enabling such a facility or facilities, but many questions remain about what sort of requirements the sector and others would want and how those mesh with existing environmental and other safeguards. With the sector's support, we have prioritised work to deliver a new coordination structure for aquaculture innovation which will provide continuity in the core functions of the Sustainable Aquaculture Innovation Centre once its transition period ends in 2026. We will take forward further discussions on innovation sites, and with the new innovation vehicle when it is ready, to consider how innovation sites could be part of the aquaculture research ecosystem in Scotland.

Separately, we expect sentinel pens will be utilised in the next year to support SEPA’s Sea Lice Risk Assessment Framework as part of the monitoring strategy underpinning the Framework, gathering information on sea lice pressure in the surrounding area, led by, and facilitated by, the salmon farming sector.

Paragraph 200. The Committee recommends the Scottish Government investigate and report on the current use of, and potential feasibility of the mandatory use of, biomarkers. This work should also aim to develop a protocol for the forensic investigation of escaped farmed fish to trace escapes back to individual farms.

Response

We recognise it is important to both mitigate the risk of escape and to act where escapes incidents do occur. However, we must also ensure we remain proportionate in our action. The risk to wild salmon from genetic introgression is dependent on numerous factors such as the age of the fish, location and how many fish escape into the environment.

We already have powers and protocols which have been utilised to investigate the origin of escaped farmed fish. There are existing powers in the Aquaculture and Fisheries (Scotland) Act 2013 which provide for the Fish Health Inspectorate to take, or require, samples from fish to determine from which fish farms fish have escaped. Genetic sampling techniques have been successfully used in freshwater in Scotland in the Loch Shin system. We would also highlight good practice by the sector to fund introgression research following escape events, for example, Mowi funded research to establish if introgression was occurring following a large-scale escape event at its Carradale site[6].

The issue of biomarkers was raised in the context of it being a potential additional tool to help trace the origin of escaped fish and it is particularly relevant where escaped fish of farmed origin appear which cannot be linked to recent escape incidents. This is not a commonly reported occurrence in Scotland and, where we have had cases in the past, such as in Loch Shin, we have taken other action to investigate those. However, we are aware of developments in Norway whereby some of the salmon farming sector funds a central database to help with tracing and understand this is done on a voluntary basis. Officials will engage with the salmon farming sector to determine if a similar approach might be appropriate in Scotland.

Paragraph 260. At the same time, the Committee agrees that the relocation of sites must be done with a full understanding of the environmental and fish health and welfare risks associated with the relocation of fish farms, as well as the economic and social impact on fish farm staff and local communities. The Committee recommends the Scottish Government commission research to assess the potential risks and benefits of moving fish farms further from the coast and to more exposed or higher energy flow sites. The Committee notes its earlier recommendation calling for the development of dedicated research pens could support this aim.

[6] Executive summary - Farm salmon escape event: levels of farm/wild hybridisation - gov.scot

Response

We agree there should be robust assessment of new development proposals, including those which seek to relocate existing biomass into alternative locations. Assessment of environmental, fish health and social and economic impacts is a key requirement of the fish farm consenting and leasing system, (delivered by Crown Estate Scotland, Local Authorities, the Scottish Environment Protection Agency, Marine Directorate and statutory and other consultees to those processes), and will continue to be the best place to consider individual development proposals on their own merits; the onus is on the fish farm developer to provide sufficient evidence to satisfy those regulatory requirements.

A variety of projects have been taking place, led by Scotland's regulators and innovation and academic institutions, to support Scotland's fish farming sector to move into more exposed locations. This includes, for example, the Off-Aqua project[7] led by the Scottish Association for Marine Science delivered in collaboration with a variety of partners to consider the potential benefits of 'offshore' aquaculture in Scotland, in addition to the EXPAND2 project[8], supported by the Sustainable Aquaculture Innovation Centre, to support the sector's development into more exposed locations through enhanced predictive modelling. SEPA is responsible for assessing the risk to the coastal water environment from proposed fish farm developments, including developments in exposed or high tidal energy locations. Modelling of Scotland's environment supports that higher energy locations provide for increased environmental capacity to handle fish farm discharges whilst supporting greater capacity for fish health treatments and medicine use.

We also have a number of farms which are already operating in higher energy locations in Scotland, including for example, Cooke's East Skelwick site in Orkney. I have also personally been able to see new technologies in use in Norway, including Salmar Aker Ocean's 'Ocean Farm' which has achieved demonstrably improved fish survival through repeated production cycles[9].

All production companies carefully assess where to position new or reposition existing farm sites to best meet their particular production approaches. Based on their experience in their Scottish estate and fish farming operations in other nations, we see greater interest in how companies want to manage sites based on energy flow. It is unlikely to be a case that one-size-fits-all in terms of siting, and it will remain important for businesses to make choices about their operations that best meets their specific needs. Production imperatives are strongly aligned with health and welfare imperatives, and we are confident this is prioritised in farmers' decision making.

[7] Off-Aqua — Scottish Association for Marine Science, Oban UK
[8] ExPAND in2 the Future: Realising the full capacity of the Scottish salmon industry
[9] Fish Health - SalMar Aker Ocean

The Committee is right that there may be an opportunity to explore further questions in relation to more exposed farm sites through the use of innovation farm sites, and this is something that can be further considered once the initial phase of establishing the successor for the Sustainable Aquaculture Innovation Centre innovation funding work has been completed.

4. Environment – discharges and interactions with wild fish

Paragraph 174. The Committee recommends that SEPA review its 2018 research report to assess whether salmon farm medicine use is still "significantly impacting" local marine environments or if the tighter standards introduced in the interim period have mitigated the impact alongside their current plans to research, monitor and address the impacts of medicine use.

Paragraph 175. The Committee is concerned by the proposed four-year implementation period for the introduction of a revised environmental quality standard for emamectin benzoate, given the environmental risks from the chemical. It recommends the Scottish Government considers whether an expedited timetable may be appropriate.

Response

SEPA is committed to ensuring that its regulatory framework is based on best available evidence and provides protection for Scotland's marine environment, upon which the fish farming sector and many others depend. In line with the precautionary approach, Environmental Quality Standards (EQS) are set using best available evidence and SEPA is committed to reviewing and commissioning studies to ensure those safeguards are working and to support an adaptive management approach.

In the case of Emamectin Benzoate (EmBz), also known as SLICE, studies indicated that this substance was more widely spread in the environment than had previously been found, leading SEPA to implement a new interim standard for fish farm developments whist the UK Technical Advisory Group considered the latest scientific evidence and protocols for deriving EQS.

The UK Technical Advisory Group recommended a new EQS for EmBz which was accepted by the Scottish Government and was higher than the interim standard introduced by SEPA. Fish farms which had been placed on the interim standard have had their standard amended to reflect the new recommendation from UK TAG. Scottish Government has directed SEPA to introduce the new standard by June 2028 -– in the meantime SEPA is applying the new standard in determining all new applications to discharge EmBz. EmBz provides fish with protection from sea lice and, as an in-feed treatment, is beneficial for farmed fish health and welfare.

I do not consider that an expedited timetable for the new EQS is appropriate. Ministers accepted the recommended timescales for the introduction of the new EQS, following a public consultation which took place from 24 April to 24 July 2023. Four sets of Directions regarding environmental standards came into force on 01 February 2025, with the standard for EmBz coming into force on 6 June 2028.

Scottish Government consulted widely on this issue, and my colleagues and I have considered feedback from stakeholders carefully. This includes the need to protect the environment, whilst also maintaining support for fish health and welfare where changes to access to medicines are being made. When seeking environmental improvements from any regulated businesses, SEPA works with the operators to enable it to identify a timetable for making the improvements that is reasonable and proportionate. Among other things, this includes enabling operators to plan any necessary investments needed to make the improvements or mitigate the effects on their operations of doing so. SEPA has committed to working with the sector to facilitate a transition to the new standards by 6 June 2028.

Paragraph 180. The Committee is disappointed by the lack of progress made by the Scottish Government in actioning the 42 recommendations from the Salmon Interactions Working Group report. It recommends the Scottish Government publish a timetable for implementing the recommendations, as a matter of urgency.

Response

A summary of what Scottish Government said it would do in response to the Salmon Interactions Working Group report, and the latest information on progress and the next steps, is included in Annex B.

Paragraph 198. The Committee notes there has been little progress in developing and introducing "appropriate sanctions" for escapes from salmon farms and, therefore, recommendation 37 has not been implemented. The Committee also notes the review of the 2015 technical standard for Scottish finfish aquaculture, set out in the Scottish Government's response to the REC Committee report and committed to again in the 2023-24 programme for government, has yet to be progressed. The Cabinet Secretary has said she cannot commit to a firm timescale for undertaking these two workstreams. The Committee recommends that, given consideration of penalties is a commitment within the NASCO Implementation Plan for the period 2019-2024 and the review of the 2015 technical standard for Scottish finfish aquaculture which was on-going in January 2019 has yet to conclude, the Scottish Government should set out a clear timetable for when it expects to be in a position to conclude this work.

Response

We remain committed to taking forward a programme of work to make fish farm containment measures more robust, including delivery of a revised technical standard to reduce the risk of farm escapes and the introduction of financial penalties for fish farm escapes with the ultimate aim of redistributing money to support wild salmonid conservation and research.

In the case of interactions, as I outlined to Committee, we have prioritised development and delivery of SEPA's Sea Lice Risk Assessment Framework.

In the coming year, we will work with SEPA to develop the monitoring programme which underpins its sea lice risk assessment framework. From March 2025, the framework will provide protection for sea trout. We will also work with SEPA to plan the managed transition away from control of sea lice and the risk to wild salmonids through local authority Environmental Management Plans, which will be phased out by the end of 2025 and replaced by SEPA's national monitoring plan.

We will also deliver updated working arrangements guidance, which sets out how regulators and statutory consultees work together to deliver the fish farm consenting system, in light of SEPA's new responsibilities by the end of this year (2025).

Committee members may be aware that fish farming businesses have appealed sea lice reporting and sea lice limit conditions issued to existing fish farms by SEPA as part the sea lice risk assessment frameworks implementation. At the time of this response Scottish Government's Planning and Environmental Appeals Division had received 210 appeals. In the coming weeks I will work with my officials and SEPA to understand whether there are any implications of the appeals on the above milestones.

However, I understand stakeholder and Committee's concerns about the lack of information on when outstanding escapes commitments will be progressed – both the fisheries and salmon farming sectors included. Subject to satisfactory completion of the above activities, officials will prioritise progress to introduce financial penalties for fish farm escapes in the following delivery year, 2026/2027, followed by work on the technical standard in 2027/2028. It is difficult to be definitive on delivery timescales whilst scoping activities are conducted, however it is my intention that these projects would be fully resourced and making good progress within the aforementioned timescales. I have made the decision to prioritise financial penalties on escapes over the updated Technical Standard as a result of resource constraints within Scottish Government, but also given the views of our external partners which we rely on to deliver almost all of our work. This also takes into account that there is an existing technical standard in operation, and we are confident in the actions being taken by the sector to fulfil their responsibilities to reduce the risk of escapes.

Paragraph 211. The Committee recommends the Scottish Government provide an update, as a matter of urgency, on its progress against the commitment to building an evidence base through coordinated scientific research and monitoring which is included in the Wild Salmon Strategy Implementation Plan. This should include an update on the defined research objectives, monitoring framework and reporting requirements.

Response

Our Wild Salmon Strategy and Implementation Plan provides an overarching framework to tackle pressures on wild salmon. It brings together the range of organisations with an interest and remit to protect salmon, including the Scottish Environment Protection Agency (SEPA), District Salmon Fishery Boards, River Trusts, NatureScot and Scottish Forestry. The Plan is supported by a Delivery Group and Science and Evidence Board.

The Delivery Group will commission evidence from the Science and Evidence Board on a range of topics relating to wild salmon protection and restoration. The Science and Evidence Board is ultimately responsible to the Delivery Group, which will use the evidence to develop policy recommendations.

The Science and Evidence Board is chaired by Marine Directorate, and includes experts from a wide range of organisations, including academia[10]. Our ambition is to have a coordinated approach to salmon research across Scotland to enable strategic delivery, analysis and publication of scientific data and reports.

Progress in meeting these objectives is described in more detail in our response to the recommendations of the Salmon Interactions Working Group, at Annex B. The Scottish Government is also supporting SEPA in the process of implementing a multi-year programme of environmental monitoring to assess the risk posed by sea lice to wild salmon populations, through their Sea Lice Risk Assessment Framework. This programme complements existing monitoring undertaken by SEPA, the Scottish Government and local fisheries managers to assess and manage the impact of pressures on Scotland's water environment and the wild salmon populations that it supports.

Paragraph 212. The Committee is aware of the NASCO-commissioned review of the effect of salmon aquaculture on wild Atlantic salmon populations. The Committee recommends the Scottish Government consider the findings of this review in so far as they relate to the risk posed to wild salmon from sea lice dispersal from farmed sites in Scotland when the review report is published. The Committee also recommends the Scottish Government update the Committee on what, if any, changes it then intends to make to finfish aquaculture policy as a result of the NASCO review findings.

[10] Wild Salmon Strategy Implementation Plan Delivery Group - gov.scot

Response

The Scottish Government has contributed scientific expertise to support the NASCO state of knowledge paper on the risk that sea lice from fish farms pose to wild salmon. We will work with SEPA to consider whether the outcomes of this review have any material impact on SEPA's Sea Lice Risk Assessment Framework, and I am happy to keep the Committee updated on this. SEPA remains committed to ensuring the framework is based on best available evidence and can adapt to new evidence in future.

Paragraph 222. The Committee recommends that SEPA implements the Salmon Integration Working Group recommendation that the lead body tasked with this responsibility should be "required to coordinate its activities with all regulatory bodies with responsibility for the range of pressures that wild salmonids face". The Committee recommends that a memorandum of understanding between SEPA and other relevant bodies to ensure a coordinated approach to managing the impacts of farmed salmon on wild salmon as a means to achieve this coordinated approach.

Response

As the lead for producing river basin management plans, SEPA works with other regulatory bodies to establish programmes of measures aimed at achieving the plans' environmental objectives and is committed to working with others to coordinate activity to address the range of pressures which wild salmonids face. These programmes of measures will consider all anthropogenic pressures identified as contributing significantly to impacts on wild salmon.

Our Wild Salmon Strategy, published in January 2022, provided an overarching framework to tackle the wide range of pressures on wild salmon. It brings together the range of organisations with responsibilities to protect salmon, including District Salmon Fishery Boards, River Trusts, NatureScot and Scottish Forestry. A Strategy Implementation Plan 2023-2028 identifies collective action for wild salmon across government, business and charitable sectors.

In the case of managing the risks to wild salmonids from fish farms, SEPA is currently working with Scottish Government and other regulators and statutory consultees to update the working arrangements document. This sets out the roles and responsibilities of regulators and advisory bodies in the consenting processes for marine fish farm developments and how those regulatory bodies work together. Beyond recognising SEPA's new role as lead body responsible for sea lice and the risks to wild fish in the revised working arrangements guidance, we intend to ensure the working arrangement document is regularly reviewed and updated.

Paragraph 236. The Committee notes the complaint made by Wildfish and the Coastal Communities Network to Environmental Standards Scotland about whether the SEPA Sea Lice Framework is compliant with environmental law. The Committee requests the Scottish Government keep it informed of the outcome of Environmental Standards Scotland's investigation and, if the complaint is upheld, how it and SEPA intends to respond.

Response

Representation is currently under internal evaluation by Environmental Standards Scotland (ESS), and we await a decision from them as to whether an investigation will be taken forward. Information on active evaluations and investigations is available on ESS's Website[11] and we will keep the Committee updated on progress.

Paragraph 237. The Committee recommends an immediate end to the siting of farms in the close vicinity of known migratory routes for wild salmon.

Response

In response to the Rural Economy and Connectivity Report in January 2019, the Scottish Government set out that the risk posed by sea lice from fish farms is not solely predicated on proximity of salmon farms to migratory routes, but influenced by the farm's location, the number of fish on the farm, the farm's sea lice management measures, the behaviour of the surrounding water environment and the potential for cumulative effects (the interaction and number of additional farms in the environment). SEPA's Sea Lice Risk Assessment Framework has been designed to assess and manage this risk. All proposed fish farm developments, irrespective of their location, are subject to an appropriate risk assessment. If this assessment concludes a development is incompatible with the protection of wild salmon populations, SEPA will not grant authorisation.

Paragraph 282. Given the importance of environmental management plans as a mechanism to deliver joint working between farmed and wild fish sectors, the Committee recommends the Scottish Government undertake a review of the use of environmental management plans in local planning to ensure it remains fit for purpose.

Response

In 2019 we delivered change at a local level by advising that sea lice related Environmental Management Plans (EMPs) should be standard for any new consents for marine aquaculture where there is potential for sea lice interaction with wild fish.

[11] https://environmentalstandards.scot/

We recognise that in this instance, local authorities are not best placed to manage sea lice and their interactions with farmed fish and had always intended use of EMPs for this matter as an interim measure and whilst a new framework was developed.

With the implementation of SEPA's Sea Lice Risk Assessment Framework, we expect EMPs relating to the management of interactions between sea lice from fish farms and wild salmonids will be phased out by the end of 2025.

SEPA is establishing targeted environmental monitoring programmes to underpin the implementation of its Sea Lice Risk Assessment Framework. These will be in place prior to EMP monitoring requirements ending. It has established stakeholder advisory groups to help and advise it on these monitoring programmes. Fisheries Management Scotland is represented on these groups.

We will continue to work with local authorities and others to ensure that revised working arrangements guidance reflects instances where local authorities or others may explore use of an EMP for matters other than sea lice.

5. Spatial Planning, Consenting and Community Benefit

Paragraph 259. The Committee notes the broad support for a mechanism to facilitate the relocation of existing sites, to give industry the flexibility to relocate to protect fish welfare and mitigate environmental impacts. The Committee also notes there is no evidence that recommendation 53 calling for "immediate dialogue" with the industry on this issue has been implemented. The Committee recommends this is progressed as a matter of urgency.

Response

Scottish Government is committed to ensuring fish farms are appropriately sited and that fish farm technology, production and husbandry methods are suitable for the chosen location. We agree that relocation of fish farms and/ or production must be done with a full assessment of development proposals in the context of the new locations. This includes ensuring all consenting requirements are in place, including consideration of Environmental Impact Assessments and Habitats Regulation Appraisals. Fish farms operate within the boundaries of their permissions. On some occasions, where those have not proven optimal for the fish or business, or where conditions have changed efficiency of the site, fish farm operators have stopped or changed production methods and are looking to relocate biomass to suitable locations, which may include high energy and more exposed locations, supported by SEPA's new finfish framework which removed the previous biomass cap on fish farm developments (delivered through enhanced modelling and monitoring capabilities).

Consenting Processes

However, we know that early planning by fish farmers for new or revised developments, coupled with application activities, can take up to four years. We are working with the Consenting Task Group, which includes regulators and the sector, to identify and pilot efficient and effective consenting processes which allow determinations to be made as quickly as possible. We are currently focussed on pre-application activities which can help developers to consider and identify potential locations for development and how to sustainably accommodate their plans to provide greater certainty on areas suitable for development and those which may have some constraints. Pilots of a 'single-case flow' approach which coordinates planning and SEPA CAR licence processes are ongoing in Shetland and Highland local authority areas. We expect the output of independent evaluation of the pilots in April 2025, beyond which we hope to be able to broaden out testing to additional local authority areas. In the coming months we will meet with marine salmon farming businesses to discuss their development plans across Scotland and to consider how public bodies can work to strategically support and coordinate their activity. We will also explore how to support relocation and consolidation activities in National Marine Plan 2. SEPA has also committed to open dialogue with the sector on the reshaping of farm estates, e.g. location, shortening of production cycles, to suit operators needs whilst ensuring protection of the environment.

Resources

The Consenting Task Group is working to ensure that the fish farm consenting pilots deliver efficiencies for both the developer and the regulators involved in determining and/ or providing advice in the consenting process. However, we know that to deliver success we need to ensure that the consenting system is well resourced. Assessment of new and/ or relocation applications carries the same processing and determination costs, and we are working to ensure that the fish farm consenting system works on a cost recovery basis as far as is possible to ensure the timely processing of applications. We recently consulted on a range of proposals which aims to ensure that Scotland's planning services have the resources and skills at their disposal to support delivery of much needed investment in our places. In September 2024, we published a blog outlining the proposals we intended to implement, those which required further consideration and those which we were not intending to take forward at this time. We have already taken action to increase planning fees to take account of the effects of inflation in 2022 and 2023 providing much needed additional financial resource to authorities with further changes planned for this summer which will see fees increase in line with inflation for 2024 and the introduction of fees for appealing planning decisions.

We have established a new Planning Hub, which is prioritising action on renewables, and we will work to understand how we might incorporate other priority areas of action, including aquaculture, in future.

In late February, we launched our Future Planners Programme – recruiting up to 18 graduates into the Scottish Government where they will work part-time, gaining valuable practical experience, alongside studying for a Masters Degree in Planning and we will also be launching our National Planning Skills Campaign providing a new co-ordinated approach to training and a more direct approach towards recruitment, including raising the profile of available talent, supporting more bursaries and modernising the image of planning.

Paragraph 267. The Committee notes the criticism from industry about the consenting process and is disappointed in the slow pace of progress to address these concerns. The Committee also notes the Cabinet Secretary's ambition to ensure Scotland-wide improvements are adopted by Spring 2026. The Committee requests the Scottish Government, in its response to this report, to provide further information about the process by which any proposed improvements will be assessed and implemented to this timescale and to be kept updated on the evaluation of the pilot projects.

Response

We expect the independent evaluator to report in April 2025. Evaluators are considering the joint and coordinated pre-application process introduced to Shetland and Highland local authority areas in January 2024 and, pending results of the evaluation, we hope to extend the pilots to additional local authority areas. Our ambition is to introduce the first process improvements Scotland wide (via updated working arrangements guidance which sets out how the different regulators and statutory consultees work to consider development proposals) by Spring 2026 and we are committed to introducing improvements for the benefit of all as quickly as possible. However, the next steps must be informed by the outcomes of the evaluation, and we will keep the Committee updated on progress this year.

Beyond the coordinated pre-application processes, we will also begin to assess improvements to delivery of Environmental Impact Assessment and Habitat Regulations appraisals this year, alongside alignment of the final stages of the planning and SEPA CAR application processes.

Paragraph 275. The Committee notes that the Scottish Government has published guiding principles on the environment which provides additional detail to support local authorities when applying the precautionary principle in their day-to-day activities. The provision of this information represents progress in delivering recommendations 48 and 49 of the REC Committee report. However, the Committee requests the Scottish Government reviews relevant planning and consenting guidance to ensure that it reflects how the

precautionary principle and other guiding principles on the environment should be applied. The Committee also recommends that the Scottish Government ensure the guiding principles on the environment are embedded within the policies and principles of National Marine Plan 2.

Response

All planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan comprises National Planning Framework 4 (NPF4) and the relevant local development plan for the area. The development plan should be read and applied as a whole.

NPF4 Policy 4: Natural Places intends to protect, restore and enhance natural assets making best use of nature-based solutions. Part (e) of policy 4 sets out that the precautionary principle will be applied in accordance with relevant legislation and Scottish Government guidance.

Ministers and public authorities should give due regard to the five guiding principles on the environment through the established Strategic Environmental Assessment processes, including during the completion of SEA pre-screening, screening and environmental report. Where proposals are not subject to environmental assessment under section 1 of the Environmental Assessment (Scotland) Act 2005, consideration should be given to the most appropriate means of recording compliance with the duty.

Our Scottish Planning Policy guidance[12] makes clear planning authorities should apply the precautionary principle where the impacts of a proposed development are uncertain, but that there is evidence that irreversible damage could occur. The precautionary principle should not be used to impede development without justification and local authorities are expected to consider mitigations and/ or modifications to eliminate the risk of irreversible damage and the potential for research, surveys or assessments to remove or reduce any uncertainty.

The application of the precautionary principle across decision-making is wide ranging and public bodies should have flexibility to determine its application and any mitigations on a case-by-case basis, including through advice of statutory consultees in the development process. We have evidence of the precautionary principle in action across a range of fish farm consenting decisions and we will consider whether it is possible to reflect case studies in future iterations of our working arrangements guidance which sets out how local authorities and other fish farm regulators work together to determine fish farm consents. In the case of sea lice and the potential transfer to wild fish, we have worked closely with local authorities and other

[12] https://www.gov.scot/publications/scottish-planning-policy/pages/7/

regulators to deliver a new framework under SEPA's licencing regime in line with the precautionary principle and to support adaptive management.

As the Committee notes, the Scottish Government has consulted upon and published guidance to help public bodies fulfil their duties to have due regard to the guiding principles on the environment[13]. We're committed to assessing and aligning development of National Marine Plan 2 with the guiding principles on the environment and as recognised in our recent consultation on our National Marine Plan 2 Planning Position statement[14].

Paragraph 276. The Committee recommends the Scottish Government set out in its response to this report how it intends to progress regional marine planning to provide more localised approaches to planning for salmon farms.

Paragraph 277. The REC Committee's recommendation 51 called for a spatial planning exercise to inform strategic guidance on areas that are suitable or not suitable for salmon farming. The Committee understands this exercise has not been undertaken. The Committee took evidence that illustrated some of the potential challenges of initiating a zonal approach to spatial planning but recommends that this exercise should be progressed.

Response

The Scottish Government does not currently support a zonal approach to spatial planning for fish farming. However, we agree that spatial planning tools at the national, regional and local levels need to be improved, and we have committed to doing so in our Vision for Sustainable Aquaculture. Spatial planning in Scotland operates to different scales and for different purposes. Our national planning and marine plans, which implement various spatial policies including the presumption against certain developments on the North and East coasts of Scotland, to regional marine plans and local development plans, Priority Marine Feature and other constraints maps, disease management areas and nutrient enhancement capacity, for example.

We will explore through development of National Marine Plan 2 a commitment to bringing those management measures and spatial constraints into one place and which will provide significantly improved upfront integrated spatial guidance beyond the expected adoption of National Marine Plan 2 in 2027 and which would align with proposals for planning policy on improvements in spatial data for the fisheries sectors as set out in the National Marine Plan 2 Planning Position statement.

[13] https://www.gov.scot/publications/scotlands-guiding-principles-environment-statutory-guidance/pages/1/

[14] https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2024/11/nmp2-planning-position-statement/documents/national-marine-plan-2-planning-position-statement/national-marine-plan-2-planning-position-statement/govscot%3Adocument/national-marine-plan-2-planning-position-statement.pdf

Separate to macro-scale plans, SEPA is bringing together information from all regulators during the pre-application process to deliver an initial modelling screening and risk identification report and joint pre-application advice as part of the fish farm consenting pilots. Reports can be viewed on SEPA's webpages: Screening modelling and risk identification report | Scottish Environment Protection Agency (SEPA).

While no Regional Marine Plan (RMP) has yet been adopted, when in place RMPs will reflect local circumstances and issues. The Scottish Government undertook a gateway review of developing Regional Marine Plans for the Shetland, Orkney, and Clyde regions in 2023, which identified that the plans would need work and revision before seeking approval from Ministers, and our policy team continue to work constructively with each Marine Planning Partnership to refine and develop their plans to be suitable to move to the next stage of development.

The draft Shetland RMP has been through public consultation and work is advancing, with an aim to seek Ministerial approval for adoption in 2025. The draft Orkney RMP concluded a public consultation on 25 October 2024 and responses are currently being considered. Officials will support the partnership throughout the year to produce a final draft RMP suitable for Ministerial consideration. The draft Clyde RMP is in the process of being updated ahead of identifying a suitable consultation period.

Paragraph 278. As part of this exercise, the Committee emphasises that consideration must be given to how marine spatial planning will incorporate new knowledge and adapt to changing environmental, social and economic conditions in relation to salmon farm developments, as well as the data collection, modelling and monitoring. This should aim to inform an adaptive planning approach flexible to respond to both short-term acute environmental events and the long-term trajectory of climate change impacts on the sustainability of salmon farming. The Committee notes the Scottish Government is currently developing the National Marine Plan 2 and that this may be the appropriate vehicle to deliver this recommendation. The Committee requests how this recommendation will be implemented in its response to this report.

Response

National Marine Plan 2 (NMP2) will be designed to support adaptive management of marine planning to support sustainable development of all of Scotland's marine sectors. As an updated planning framework, National Marine Plan 2 will introduce new objectives across the economy and the environment (including how marine planning can help us respond to the climate and biodiversity crises) and planning policies to support management of our marine space.

By ensuring new information is made available to end users through the spatial mapping exercise outlined, we will be able to incorporate the latest knowledge into marine licensing and consenting decisions and future marine plans. The

consideration of adaptive management of marine planning in NMP2 is being underpinned by the development of the monitoring and evaluation framework and the implementation proposals alongside the planning policy development.

Paragraph 302. The Committee recommends that the Scottish Government consults with relevant stakeholders and affected communities to develop good practice principles for community benefits for aquaculture developments. These should aim to create greater transparency around community benefit packages and ensure they are tailored to the characteristics of each development and their local communities. The Committee also agrees that community benefit funds should consider the priorities of communities through a social contract in the consenting regime as recommended by the 2022 review of the aquaculture regulatory process in Scotland.

Response

Our Vision for Sustainable Aquaculture commits to ensuring that communities which host aquaculture are engaged in the sector's development, share in its success and are supported through a range of lasting benefits.

Through Crown Estate Scotland, we have already seen an increase in fish farm rents, which in turn has increased funding available to coastal communities for community benefit, and lease fees are set to increase to 1.5% of notional turnover from 2026.

We will explore with our stakeholders, including local Government, the sector, Crown Estate Scotland and Highlands and Islands Enterprise Agency, how we can build on existing practice to ensure that funds and/ or community social contracts deliver on community priorities, including through the development of good practice principles for community benefit from aquaculture development. We will commence scoping work in 2025/2026, with a view to commencing delivery beyond the 2026 Crown Estate Scotland lease fee increases.

Annex A

Scottish Government Commitments and Indicative Timescales

This Annex summarises commitments made by the Scottish Government in response to the Rural Affairs and Islands 'Salmon Farming in Scotland' Report 2025 and the indicative timescales. The commitments summarised below should be read within the context provided in the main body of our response, however we hope the below summary is useful to Committee members and other stakeholders.

1. Updates to Rural Affairs and Islands Committee

- **September 2025** update on overall progress

- With commitments to keep Committee updated on external activity:
  - Publication of University of Glasgow report on cleanerfish, commissioned by Nature Scot
  - Publication of the Scottish Animal Welfare Commissions Report on 'Use of Cleanerfish in Salmon Farming'
  - Progress by SEPA on the objectives, monitoring framework and reporting requirements under SEPA's Sea Lice Risk Assessment Framework
  - Publication of NASCO's state of the knowledge paper on sea lice and the risks to wild fish
  - Environment Standard's Scotland activity if an investigation on protections for wild salmon under SEPA's sea lice risk assessment framework is taken forward
  - Commissioning and delivery if any projects to support potential use of eDNA monitoring work in Scotland for benthic assessment

2. Commitments by Sub-Heading

I. Information Management and Data

- We will take forward work to explore how the presentation and accessibility of existing data collections can be improved. We acknowledge that Scotland's Aquaculture website requires modernisation and will work with partners to scope out how it can be refreshed to enhance transparency. We will take forward scoping work within **2025-26**, anticipating that implementation especially of the website will take longer

II. Fish Health, Welfare and Cleanerfish

- We will work to analyse mortality data, exploring thresholds for 'persistently high mortality' and whether fish farms with 'persistently high mortality' exist [**2025/2026**]

- We will undertake an analysis of options, including statutory and other alternatives, to understand how welfare standards can best be supported. We

expect this options appraisal to be completed ahead of the proposed September update to the Committee, and we will set out next steps at that point. [**2025/2026**]

- We have commissioned Sea Fish Industry Authority to undertake initial scoping work to help inform our approach to non-quota species (which includes Wrasse) FMPs in Scotland. We will consider the outputs of any forthcoming advice in **2026**

- We will deliver a Fisheries Assessment (Habitat Regulation Appraisal and Appropriate Assessment) prior to May **2025 fishery** (opening of the fishery)

III. Science and Innovation

- We will continue to engage with the Farmed Fish Health Framework Steering Group, the Marine Association for Science and Technology and the Sustainable Aquaculture Innovation Centre to provide direction and focus to ongoing research programmes [**2025/2026 and beyond**]

- We will also engage with the Chief Scientific Advisor (Marine), Professor Mark Inall, to ensure aquaculture priorities are factored into the strategic approaches to marine science under his leadership, including through implementation of our Marine Science and Innovation Strategy, and publication of an Areas of Research Interest Paper to identify and enable research priorities and knowledge transfer to key communities of interest [**2025/2026**]

- We will continue to support projects which deliver on our blue economy objectives, including through the Marine Fund Scotland, including projects such as work to progress eDNA benthic sampling **[ongoing]**

- Deliver a new coordination structure for aquaculture innovation in Scotland beyond the Sustainable Aquaculture Innovation Centre transition period **[2026]**, taking further discussion on innovation sites with the sector and others when this innovation vehicle is ready **[2027/2028]**

- Officials will engage with the salmon farming sector to determine whether sector led voluntary biomarker databases are appropriate for Scotland **[2026/27]**

IV. Environment – Discharges and Interactions with Wild Fish

- SEPA will introduce the new Environmental Quality Standard for Emamectin Benzoate by **June 2028**

- Scottish Government will continue to work with SEPA and the sector to support development of the monitoring strategy underpinning SEPA's Sea Lice Risk Assessment Framework (including introduction of sentinel cage monitoring in **2025**) and to manage the transition of governance of this issue under existing local authority Environmental Management Plans by **the end**

of 2025. Scottish Government will publish updated working arrangements guidance for fish farm developments by the **end of 2025**[15]

- We will prioritise progress on financial penalties for fish farm escapes in **2026/2027**, and a revised technical standard for finfish escapes in **2027/2028**

V. Spatial Planning, Consenting and Community Benefit

- Following consideration of the independent evaluation (expected **April 2025**), deliver improvements to the fish farm consenting process through our Consenting Task Group, including prioritising discussion and coordination of regulatory activities and resources which could support the salmon farming sector to consolidate and relocate biomass [in phases, **2025/ 2026** and **2026/2027**]

- Beyond updates to reflect SEPA's role as the lead body responsible for managing the risk to wild salmonids from sea lice (**by end of 2025**), we will support ongoing review and updates to our working arrangements guidance to reflect, for example, implementation of improvements to consenting delivered by the Consenting Task Group and consideration of the inclusion of precautionary principles consenting case studies **[aim for first CTG related updates by Spring 2026, with ongoing review and update thereafter]**

- To support the sector's development in more exposed and 'offshore' waters, we will respond to the recent planning consultation [**April 2025**] which sought views on extending local authority planning controls and the relevant marine planning zones to 12 nm and we will take forward work to clarify the broader regulatory framework in **2025/2026**

- We will explore, through the development of National Marine Plan 2, a commitment to bring the range of management measures and spatial constraints data for salmon farming into one place beyond the expected adoption of the plan in **2027**, in addition to continued progress of our Regional Marine Plan programme. Further, we will explore support for 'relocation' of salmon farms through the development of NMP 2 and how it can work to underpin adaptive management approaches.

- We will commence scoping work on a community benefit package in **2025/2026**, which could be progressed beyond the planned fish farm rent uplift planned in **2026**

[15] To date, Scottish Government Department of Planning and Appeals has received 210 appeals relating to SEPA's sea lice risk assessment framework. In the coming weeks officials will work with SEPA to consider any implications for this year's work plan.

Annex B

Salmon Interactions Working Group Progress

Recommendation: The Committee recommends the Scottish Government publish a timetable for implementing the recommendations of the Salmon Interactions Working Group Report as a matter of urgency.

This Annex summarises commitments made by Scottish Government in response to the recommendations of the Salmon Interactions Working Group report and their current status. The full context of the recommendations and the commitments made by Scottish Government in response can be viewed here: Salmon Interactions Working Group Report: Scottish Government Response - gov.scot.

Theme	Commitment made by SG in SIWG response	Status
Section One Wild Farmed Interactions	SEPA will become the lead body for managing the risk to wild salmonids from sea lice. SEPA will take forward the further framework developed by the technical group, including public consultation.	SEPA has delivered two consultations to support development of the sea lice risk assessment framework in 2021 and 2023. A third consultation is currently open which explores charging to deliver the monitoring requirements of the framework and is available to view here: Marine pen fish farming: Charging changes - Scottish Environment Protection Agency - Citizen Space.
	Local Authorities would no longer be advised to include Environment Management Plans to manage the risk to wild salmonids from sea lice. Transition will be managed by an implementation group.	In 2019, as an interim measure, Marine Directorate (SEDD Portfolio), as a statutory consultee to the fish farm planning process, advised planning authorities that Environment Management Plans (EMPs) should be standard for any new consents for marine aquaculture where there is the potential for sea lice interactions with wild fish. As of 1 February 2024, in line with SEPA's implementation of its Sea Lice Risk Assessment Framework, SEDD is no longer advising planning authorities to include EMP conditions where the development falls within a wild salmon protection zone. For existing EMPs, SEPA intend to incorporate protections for sea trout into its Framework from March 2025, aided by delivery of a national monitoring strategy. SEPA, planning authorities and Scottish Government will work together to manage the transition from existing EMPs by the end

		of 2025.*
	We agree that local engagement mechanisms between fish farmers and wild fishery managers should be established to facilitate pre-application discussion, agree joint local management priorities and projects, act as a forum for information and data exchange and identify research priorities and request management action as appropriate.	We continue to support effective engagement between sectors through funding of the Aquaculture Interactions Manager post, now delivered through funding made available by Crown Estate Scotland (CES). This post has responsibilities to promote common understanding between aquaculture companies, Fisheries Management Scotland and relevant District Salmon Fishery Boards and Fisheries Trusts on optimal approaches to managing and monitoring interactions between wild and farmed fish, at local and national level. The final recommendations from the CES review of aquaculture leases have been implemented since January 2023. They include a reporting obligation on tenants. For finfish farming tenants, reporting includes participation in collaborative management agreements. Collaborative management reports are published on Crown Estate Scotland's website: Annual sustainability reporting | Crown Estate Scotland. The objective is to inform CES and other stakeholder interests through publication of these reports on the CES website of the extent to which a tenant is participating in such agreements and thereby engaging in beneficial and collaborative co-existence in relation to cumulative impacts. CES publishes the reports to provide transparency in anticipation that this will also serve as an inducement for signatories to ensure they are productive, and with what CES hopes will be positive feedback, encourage further participation by others. We are committed to ensuring District Salmon Fishery Boards remain a statutory consultee to the fish farm planning process and SEPA is working to manage the transition in evidence and opinion on the risk of sea lice to wild salmonids provided by District Salmon Fishery Boards as part of SEPA's Sea Lice Risk Assessment Framework.

	To support relocation where those relate to sea lice interactions – SEPA will work to provide developers seeking to relocate with upfront environmental capacity information and efficiency of the consenting regime will be considered by a consenting task group.	Please see our response to **paragraph 259**. Scottish Government is committed to ensuring fish farms are appropriately sited and that fish farm technology, production and husbandry methods are suitable for the chosen location. On some occasions, where developments have not proven optimal for the fish or business, or where conditions have changed efficiency of the site, many fish farm operators have stopped or changed production methods and are looking to relocate biomass and reduce their overall footprint, whilst also seeking opportunities for new developments in more exposed locations, supported by SEPA's new finfish framework which removed the previous biomass cap on fish farm developments (delivered through enhanced modelling and monitoring capabilities). Further SEPA's enhanced environmental regime, or its new Sea Lice Risk Assessment Framework, may lead to the agreement that, in some circumstances, existing biomass may be better located elsewhere – however such decisions and discussions must be backed by clear evidence of the requirement to do so. Whether for business, environmental and fish health aims, or a combination of all of these factors, we are committed to supporting relocation and consolidation of the farm estate through our Consenting Task Group. SEPA has also committed to open to dialogue with the sector on the reshaping of farm estates, e.g. location, shortening of production cycles, to suit operators needs whilst ensuring protection of the environment.
	The farmed fish health framework is considering access to, and control of, treatment and medicines including those used in the control of sea lice and will consider this in the context of a holistic approach to sea lice control.	Scoping of this work is pending further consideration given that members of the Farmed Fish Health Framework Steering Group expressed a strong preference for a holistic review of medicines use to extend beyond sea lice medicines.

Section Two **Licensing and Enforcement Recommendations** **Sea Lice**	We agree that robust conditions, based on an adaptive management approach to safeguard wild salmonids should be contained within a licence rather than through planning consent and that relevant licence conditions should apply to existing, as well as new, fish farms.	SEPA commenced implementation of the Sea Lice Risk Assessment Framework on 1 February 2024. The plan is for the Framework to be implemented in phases – from March 2025, existing farms identified as contributing to potential risks to wild salmon (farms other than those in the lowest risk category) will be required to comply with 'standstill' sea lice limit conditions through variations to their licences. Also from March 2025, all licences will include monitoring and reporting requirements. SEPA will carry out checks to ensure monitoring is being carried out in accordance with specified performance standards. The Framework for protecting sea trout populations will start in March 2025.*
	We agree that, as a priority, the consenting of new developments should be managed through the application of an adaptive spatially based risk assessment tool, underpinned by the best scientific evidence available which takes into account the cumulative effects of management practices of existing fish farms and potential impacts on wild salmon.	
Section Two **Licensing and Enforcement Recommendations** **Escapes**	We commit to further strengthening of the framework which applies to containment and escapes. We will take forward a programme of work to consider how best to achieve this, including how to introduce proportionate penalties for fish farm escapes with the ultimate aim of ringfencing or redistributing this money to support wild salmonid conservation and research…. We will consider what works well in other jurisdictions and consider how fish farm operators can take financial responsibility for the impact of escapes in a way that is fair and proportionate.	See response to **paragraph 198**. We remain committed to taking forward a programme of work to make fish farm containment measures more robust, including delivery of a revised technical standard to reduce the risk of farm escapes and the introduction of penalties for fish farm escapes with the ultimate aim of redistributing money to support wild salmonid conservation and research. We currently expect to prioritise progress to introduce financial penalties for fish farm escapes in the 2026/2027 delivery year (commencing April 2026).
	We, with the fish farming sector, are revising the Technical Standard for Scottish Finfish Aquaculture which will take account of climate change and higher energy sites to further improve containment at Scottish fish	Delivery on financial penalties for fish farm escapes will be progressed as a priority, however beyond this, we currently expect to deliver on the revised technical standard for finfish aquaculture in the following business year [2027/2028].

	farm sites (original commitment to progress by end of 2021).	
	We note calls from the Salmon Interactions Working Group to establish one lead body to take responsibility for interactions and that conditions and enforcement should be achieved through a licencing regime. We will consider this in forming our policy options, including how the technical standard for Scottish Finfish Aquaculture would fit within or alongside any enforcement regime.	This is an attractive proposal; however, we also note that regimes for the purposed of fish health and containment (FHI), and for the protection of the environmental management (SEPA) operate under different statute and for different purposes. We prioritised work to address sea lice and interactions with wild fish, and particularly in response to concerns that gaps in responsibilities exist. Our initial assessment of the Salmon Interactions Working Group report was that many of the requirements relating to escapes were already being met (including reporting, requirement to implement and demonstrate 'satisfactory measures' for the purposes of containment and our associated inspection and enforcement regime, contingency plans etc) and fall under the responsibility of the Fish Health Inspectorate, however there were areas which we felt required action, and we committed to progressing work to introduce financial penalties for fish farm escapes and introduction of a revised technical standard. We remain committed to ensuring that the best policy option is chosen to strengthen the escapes framework and to ensuring that fish farm regulators work together regardless of the outcome.
Section Three **Farmed and Wild Salmonid Data Recommendations**	The Scottish Government has a statutory responsibility to collect and publish salmon catch data submitted from local fisheries occupiers. We acknowledge the importance of applying accurate catch and associated data and have previously published an assessment of the value of rod catch data. A key next step is to increase the availability of salmon count data, together with monitoring biological characteristics of adult salmon, to augment assessments of salmon stock status under the Salmon Conservation Regulations	The Scottish Government continues to aggregate wild salmon and sea trout catch statistics, which are provided for 109 Salmon Fishery Districts, covering all of Scotland: Salmon and sea trout fishery statistics: 1952 to 2023 season - reported catch by district and method | Marine Scotland Data Publications. Catch statistics are also now published for each of the 173 areas where the conservation status of stocks is assessed: Rod fishery statistics: salmon 2011 to 2023, sea trout 2017-2023 - reported catch by Stock Assessment Area | Marine Scotland Data Publications. Future publications will also include data on rod effort. We are working on ways to make fish counter data more widely available, beginning with publishing, in 2025, the North Esk dataset. New information on the biological characteristics of adult salmon (size, age, sex) have been

	process. The potential value of fishing data is also under consideration.	collected annually through a partnership with Fisheries Management Scotland and its members since 2021. Data from 2021 – 2023 will be published in early 2025. This information will augment that already used to assess the conservation status of salmon stocks.
	We will also continue to invest in the National Electrofishing Programme for Scotland (NEPS), which provides detailed local information on juvenile salmon stocks in the aquaculture regions and elsewhere within a robust structured framework and underpins continuation of the National Introgression Programme for Scotland.	The National Electrofishing Programme for Scotland (NEPS) provides a robust framework for juvenile salmon data collection. The Scottish Government funded a NEPS data collection programme in 2023. These data are currently being analysed following a process of quality control, with a report due at the end of March 2025. Data collected under NEPS 2018, 2019 and 2021 have already been published as publicly accessible datasets, reports and online applications accessible through Marine Directorate web pages: National Electrofishing Programme for Scotland - gov.scot. In 2021 the Marine Directorate published the first national assessment of introgression in Scotland using genetic samples collected under NEPS: A national assessment of the influence of farmed salmon escapes on the genetic integrity of wild Scottish Atlantic salmon populations | Marine Scotland Data Publications. This analysis was based on genetic samples collected in 2018 and 2019 and operated on a site level. A new paper is in preparation that integrates genetic data (collected during NEPS 2021) with the powerful NEPS statistical survey design to provide the first ever regional classification of hybridisation impacts. A draft paper is expected to be complete by the end of March 2025 for submission to a peer reviewed journal. Collected genetic samples from NEPS 2023 have been processed through the Marine Directorate's genetics laboratory and await future data analysis.
	We are absolutely committed to open and transparent regulation and making data available to the public and other users of the marine environment. Scotland's Aquaculture Website currently hosts information on; • fish farm site details and location; • CAR licence conditions;	Please see our response to **paragraph 124.** We remain committed to Scotland's Aquaculture Website and SEPA remains committed to considering the publication of information collected through its new Sea Lice Risk Assessment Framework, introduced from 1 February 2024.

	• environmental monitoring surveys; • biotoxin and phytoplankton monitoring (shellfish); • escapes; • annual emissions; • Crown Estate Scotland lease details; • In-feed and bath sea lice treatments; • fish farm monthly biomass; and • sea lice data We will continue to contribute funds to the Scotland's Aquaculture Website improvement programme, led by SEPA. SEPA is committed to the continued publication of information collected through the CAR licence regime, including any additional information relating to sea lice collected as the CAR regime adapts.	We recognise improvements could be made in terms of how the existing data are arranged and explained. We will take forward work to explore how the presentation and accessibility of existing data collections can be improved. We acknowledge that Scotland's Aquaculture Website requires modernisation and will work with partners to scope out how it can be refreshed to enhance transparency.
	We commit to focussing on data requirements within the proposed Wild Salmon Strategy which will seek to bring together information that will lead to a better understanding of the geographical variation in pressures and opportunities action as identified by the SIWG in collaboration with stakeholders, including the District Salmon Fisheries Boards and Trusts. We are currently working on plans to develop a public-facing salmon catch database.	Marine Directorate has developed juvenile assessment tools to assess the status of salmon from electrofishing data. These tools have been applied nationally through the National Electrofishing Programme for Scotland (NEPS) and locally by District Salmon Fishery Boards (DSFBs) and Fishery Trusts to identify underperforming populations and assess likely pressures. In 2021 the Marine Directorate and Fisheries Management Scotland published an assessment of the spatial extent and severity of pressures acting on Atlantic salmon: Supporting documents - Atlantic salmon 2021: Scottish Marine and Freshwater Science Vol 14 No 4 - gov.scot. In 2024, Scottish Government and Crown Estate Scotland funded the development of fisheries management plans that set out the key actions that local fisheries managers consider necessary to protect and restore Scotland's wild salmon populations in their local areas: Scotland's Fishery

		Management Plans. Under the Sea Lice Risk Assessment Framework (SLRAF), SEPA and the aquaculture sector will collaborate to deliver an ongoing programme of monitoring to build confidence in the model supporting the framework. SEPA has identified 3 types of monitoring to support this purpose: • Monitoring of sea lice levels on fish held for short periods in sentinel pens to test and refine the skill of models in predicting sea lice dispersion in the sea • Monitoring of wild caught sea trout to identify if they are being impacted by sea lice. • Monitoring of juvenile salmon and trout in rivers to examine if exposure to modelled sea lice risk is impacting population status. The Scottish Government has funded three rounds of national research on introgression due to fish farm escapes under the National Introgression Programme for Scotland (2018/19, 2021, and 2023). A national assessment of the influence of farmed salmon escapes on the genetic integrity of wild Scottish Atlantic salmon populations was published in 2021. This was the first national study to examine the extent of genetic mixing caused by farmed salmon of Norwegian origin breeding with wild salmon in Scotland. Individual sampling sites were classified according to their levels of introgression (i.e. genetic material of farmed origin in wild salmon populations). The study shows that there is risk to wild salmon from introgression following farm escapes, but that the risks may be low outside the aquaculture regions, even though escaped fish may disperse widely at sea. A review was undertaken into the development of a publicly facing catch database, to which fisheries would be able to upload their data directly and that would provide public access to the data more quickly than is currently possible. However, the cost of the recommended approach was

		prohibitive. Aggregated catch data are now being published as provisional statistics in late February, whilst detailed Official Statistics are published in early May. Rod effort data will begin to be published annually, for both Salmon Fishery Districts and for individual stock assessed areas, from the publication of the next update of the Official Statistics, which will include 2024 season.
	Alongside the consideration of data requirements in the Wild Salmon Strategy, we will organise a meeting of the regulators which would be involved in making some elements of such a list at 3.4 mandatory. [3.4 The wild and farmed sectors, working collectively will provide a comprehensive package of data which should be placed on a mandatory footing and should include all data currently available on Scotland's Aquaculture website in addition to; • Results of wild fish monitoring including lice count data or observations on lice burden; • Farm management area sea lice load; • Number of farmed fish per farm; • Number of adult female lice and gravid female lice per farmed fish; • Medicinal and physical treatments undertaken; • Water temperature and salinity; • Counts from fish counters, electrofishing data and any other catch assessment data operating on local rivers; • Scottish Government assessments of wild fish conservation status (adult and juvenile fish); and, • Official wild salmon and sea trout catch	The Scottish Government has published a package of historical data and maintains datasets where resource allows. This includes: • Wild fish monitoring: ○ Data on sea lice counts on wild sea trout covering 1997-2009 and 2011-2019: Sea lice counts on wild sea trout | Marine Scotland Data Publications ○ Aggregated salmon and sea trout catch statistics, which are provided for 109 Salmon Fishery Districts, covering all of Scotland: Salmon and sea trout fishery statistics: 1952 to 2023 season - reported catch by district and method | Marine Scotland Data Publications, Catch statistics are also now published for each of the 173 areas where the conservation status of stocks is assessed: Rod fishery statistics: salmon 2011 to 2023, sea trout 2017-2023 - reported catch by Stock Assessment Area | Marine Scotland Data Publications. Future publications will also include data on rod effort. ○ We are working on ways to make fish counter data more widely available, beginning with publishing, in 2025, the North Esk dataset. Data collected on the biological characteristics of adult salmon (size, age, sex) in 2021 – 2023 will be published in early 2025. ○ In August, we published the results of the annual conservation status assessment on the SG website: The status of salmon in Scotland: 2024 - gov.scot. ○ Data from NEPS 2018, 2019, 2021 have been published as datasets, reports and ShinyApps: National Electrofishing Programme for Scotland - gov.scot. Analysis of data from

	statistics and catch effort data]	NEPS 2023 is underway and due to report at the end of March 2025.
		• Farmed fish health and welfare monitoring:
		  ○ Data on Consented and Actual Biomass on Sites, as well as (medicinal) Treatment Reports, are published on Scotland's Aquaculture website: Scotland's Aquaculture | Fish Farms Monthly Biomass & Treatment.
		  ○ The details of the weekly average adult female sea lice levels per fish as reported by industry, or where information has been obtained through Fish Health Inspectorate surveillance is published at: Scotland's aquaculture - sea lice data.
		
		We've also made a commitment to consider the modernisation of Scotland's Aquaculture Website.

Section Four **Farmed and Wild Salmonid Research Questions**	Methods developed initially for assessing salmon as part of the National Electrofishing Programme for Scotland will be adapted for assessing trout populations. This process will then facilitate an examination of pressures affecting trout across Scotland.	A new assessment benchmark has been developed for juvenile trout that allows the health of trout populations to be assessed from electrofishing data. A preliminary assessment of the status of trout will be included as part of the NEPS 2023 report, due at the end of March 2025. Work continues to publish the trout assessment method and to work internationally with the International Council for the Exploration of the Sea (ICES) to develop new and improved trout assessment methods.
	We recognise that there remain challenges with assigning the resourcing required to fully deliver further research recommendations but as an organisation we are committed to improvement and will turn our attention to how these can be taken forward. The Wild Salmon Strategy will identify and provide a mechanism for the coordination of wild salmonid research, and we are committed to creating a vision and development strategy for Scotland's aquaculture industry and as part of that process we will consider	The Science and Evidence Board (SEB) underpins the Wild Salmon Strategy. The role of the group is to bring together the vast body of scientific knowledge that is already available, particularly in relation to practical application for management, in areas specified by the Delivery Group. The SEB also functions to harmonise salmon monitoring activities and identify where evidence gaps exist with a view to prioritising targeted research. Our ambition is to have a coordinated approach to salmon monitoring and research across Scotland to enable strategic delivery, analysis and publication of scientific data and reports.

	aquaculture research priorities and how they are delivered.	
	We agree with the SIWG recommendation which acknowledges the importance of sea trout and we commit to reconvening the Regulators Technical Working Group to discuss this issue.	Following further development and consultation regarding its Sea Lice Risk Assessment Framework, SEPA will protect sea trout from March 2025 and will deliver an associated national monitoring strategy.
Section Five **Wild Salmonids Recommendations**	The Scottish Government is working with a dedicated stakeholder advisory group to develop an ambitious Wild Salmon Strategy to support wild salmon conservation efforts….. we aim to publish the strategy later in 2021. A prioritised action plan will be developed be the Wild Salmon Strategy Group following publication. The plan will include actions relating to all of the 12 high level pressures groups affecting wild salmon….. and will identify and provide a mechanism for the coordination of wild salmonid research and conservation efforts.	The Wild Salmon Strategy, published in January 2022, set out our vision for flourishing populations of wild Atlantic salmon. As outlined in the Strategy, positive outcomes for wild Atlantic salmon in Scotland cannot be achieved by Government acting alone. We worked with stakeholders to produce an accompanying Implementation Plan which was published in February 2023. This will guide collective action for wild Atlantic salmon across government, business and charitable sectors. The knowledge and expertise of various organisations will be invaluable as we collectively set about delivering the actions within the Implementation Plan. These will involve SEPA, NatureScot, and Scottish Forestry as well as District Salmon Fishery Boards (DSFBs) and Trusts and other partners. The Implementation Plan is a national plan which sets out Scotland wide actions and is not prescriptive in setting out local actions, the actions specific to a local area will be identified and managed by organisations responsible for local management. In 2024, Scottish Government and Crown Estate Scotland funded the development of fisheries management plans that set out the key actions required to protect and restore Scotland's wild salmon populations: Scotland's Fishery Management Plans. In early 2024, we published a Progress Report covering the first year of the Implementation Plan (2023-2024) which showed progress on over 50 actions. We aim to publish a further progress report by April 2025, which will detail the progress made in the preceding year on these and other actions.

* To date, Scottish Government Department of Planning and Appeals has received 210 appeals relating to SEPA's sea lice risk assessment framework. In the coming weeks officials will work with SEPA to consider any implications for this year's work plan.

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