

Salmon farming in Scotland

Letter from Lord Dundonald, 31 January 2025

Dear Mr Carson,

Re: Urgent Action Required to Address Systemic Failures in Salmon Farming Regulation

I write following the publication of your committee's 1st Report, 2025 on salmon farming, which highlights critical shortcomings in Scotland's aquaculture regulatory framework. While I welcome the committee's scrutiny, I urge you to use your influence to ensure the Scottish Government acts decisively on your recommendations to protect marine ecosystems and rural communities.

Key Concerns Aligning with RAIC Findings

Unacceptably High Mortality Rates

Your report notes average mortality rates of 25% (31.3% in 2023) and individual farm mortality events exceeding 80%—far above Norway's performance. Despite this, no enforceable morbidity thresholds exist.

The committee's recommendation to empower regulators to halt production at persistently high-mortality sites must be prioritised. At Dunstaffnage Farm, a 56.5% mortality rate in 2023 demonstrates systemic neglect, yet no agency claimed jurisdiction over fish welfare.

Regulatory Fragmentation

Your report identifies "confusion about the different regulators' responsibilities," mirroring Argyll and Bute Council's admission that no agency addressed Dunstaffnage's 2023 crisis. The proposed memorandum of understanding between SEPA, Marine Scotland, and local authorities must be expedited to close accountability gaps.

Environmental Impact Delays

The committee rightly criticises the four-year implementation period for SEPA's emamectin benzoate standards. This delay contradicts the Precautionary Principle, allowing continued harm to crustaceans and benthic ecosystems. I echo your call for an expedited timeline and stricter penalties for non-compliance. This chemical was first identified as a serious environmental threat over 16 years ago; why SEPA has taken so long to act when the data was so clear, demonstrates poor governance of that agency.

Transparency Deficits

Your report condemns the “messy and clunky” Scotland’s Aquaculture website. Mortality data remains fragmented (SEPA reports biomass, Salmon Scotland uses percentages), obscuring true impacts. Mandatory reporting of freshwater and seawater mortality per facility, as you recommend, is vital.

Wild Salmon Threats

The committee’s demand to halt farm siting near wild salmon migratory routes aligns with the Salmon Interactions Working Group’s unimplemented 2020 recommendations. With 41 of 42 proposals ignored, urgent parliamentary oversight is needed.

Requested Actions

- Immediate Moratorium on Problem Sites
- Invoke Section 95 powers to halt production at farms exceeding 30% mortality until causes are rectified, per RAIC Recommendation 56.
- Legislate Morbidity Thresholds
- Adopt Norway’s model: mandatory culling at 0.2–0.5 sea lice/fish and mortality caps tied to licensing.
- Fast-Track Regulatory Reforms
- Demand a timeline from the Cabinet Secretary for implementing the Salmon Interactions Working Group recommendations and publishing NatureScot’s suppressed 2020 wrasse fishery report.

Community Consultation

Include coastal communities in the “Consenting Task Group” pilots to address the democratic deficit in planning decisions.

The Scottish Government’s inaction contradicts its Vision for Sustainable Aquaculture. As 54 organisations highlighted in November 2024, the sector’s alleged £1.1bn economic contribution ignores costs to creel fishers, tourism, and wild fisheries. With 2023 farm employment declining and 17 million dead fish annually, the status quo is untenable.

Lastly it would be worth your committee shinning a light on the Maine Fishery, USA, which employees 10x the fish farm employees in Scotland directly, is more profitable, produces more local tax, is sustainable and benefits the community significantly more than fish farming in Scotland. I have spent much time in Maine and if we could import some of their joined up thinking, which has been developed over 100 years to Scotland, we would be much better off.

I trust your committee will hold Ministers to account, demanding binding timelines for reforms. Scotland’s marine environment and global reputation depend on it. I look forward to your reply.

Yours sincerely

Lord Dundonald
Chilean Consul