

Finlay Carson
Convenor of Rural Affairs & Islands Committee
Scottish Parliament
EH99 1SP

cc Emma Johnston, Clerk for the Committee

30th December 2025

Dear Rural Affairs & Islands Committee,

Your Follow-up Inquiry into Salmon Farming in Scotland (January 2025) concluded:

"This Committee is aware that calls for a moratorium remain, especially given the view held by some regarding the lack of progress in addressing high mortality rates since 2018..."

Industry also agrees that progress is required and has made improvements and innovations and it is the Scottish Government's role, as well as the industry's, to drive the change agenda. On this basis, the Committee does not currently support a moratorium or pause on production..."

The Committee commits to revisiting progress made on the issues raised in this report in one year and it may make further recommendations on this issue at that time."

Since that report was published, the Scottish Government's Scottish Fish Farm Production Survey 2024 has shown survival rates falling to their lowest level since 1989, with mortalities approaching one-third of all fish stocked. Had these data been available to the Committee before finalising its conclusions in January, it is reasonable to consider that its assessment of progress - and the appropriateness of a moratorium - might have looked different.

Throughout 2025, Salmon Scotland has sought to frame this year as a turning point. In its letter of 29 September, the organisation highlighted "record survival figures for January-August 2025 (92.3%)". However, more recent mortality data and reporting from October indicate that this confidence may be premature. According to the industry's own monthly reports, the overall mortality rate of farmed salmon in October was 4.78%, one of the highest monthly rates seen in 2025 and materially above both September's figures and typical industry expectations.

Mortalities are often associated with disease or elevated sea lice levels which pose serious risks to our embattled wild salmon populations. In individual cases, mortality at specific sites was acute: Cooke Aquaculture reported an October mortality of 10.9% at its Bay of Cleat (North) site in Shetland linked to gill health challenges, and local reporting described around 250,000 dead farmed salmon in Shetland waters in October alone. In the coastal waters of Skye, the Gob na Hoe site operated by Loch Duart, saw farmed salmon mortalities of 45.2% in a single month - equating to the loss of half a million fish.

These figures, together with the previously reported September spike, suggest a pattern of *persistently elevated losses* that sit uncomfortably with characterisations of improvement. As warm sea temperatures become increasingly routine, sea lice numbers have escalated, with some farms over ten times the industry's code of good practice levels; this is likely to translate into higher mortalities in the coming months. It is concerning that proposed improvements to sea-lice monitoring and reporting are currently in legal limbo following the industry's appeal of SEPA's revised licensing condition, leaving enhanced oversight of one of the sector's most persistent environmental risks effectively stalled.

Alongside concerns about mortalities and sea lice levels, 2025 has seen further events that underline continuing weaknesses in regulatory oversight. Severe weather associated with Storm Amy led to an estimated 75,000 salmon escaping from Mowi Scotland's Gorsten farm in Upper Loch Linnhe - one of the largest containment failures in recent years, which has rightly concerned local authority councillors in the Highland region. Conservation bodies have already highlighted the significant genetic and ecological risks posed by the release of such numbers of domesticated fish into the wild. The incident illustrates the vulnerability of open-net systems to environmental pressure and the need for stronger regulatory safeguards to respond to escapes of this scale. It remains our contention that escapes are an inevitable feature of the business model [and that preventing them is likely impossible.](#)

In her update to the Committee in August 2025, the Cabinet Secretary acknowledged a number of these ongoing regulatory shortcomings, including gaps in environmental monitoring, a need for more robust containment standards, and the slow pace of reform following earlier reviews. However, many of the actions set out in that update are dependent on further internal reviews or pilots, with implementation stretching into 2026 and 2027. Given the scale of mortalities, the recurrence of major escapes, and the increasing pressure from warming seas and lice proliferation, the timelines proposed cannot reasonably be considered proportionate to the environmental risks now faced by wild salmon, sea trout and the wider marine ecosystem.

The Committee will also be aware of rising public concern over the industry's environmental footprint, and the ongoing debate about its true economic contribution. Claims regarding economic importance are frequently presented without any accounting of the costs borne by coastal communities, local businesses, or the wider marine environment. When the Committee raised the need for a national cost-benefit analysis (CBA) with the Cabinet Secretary in November 2024, she suggested that such analyses are carried out at planning-application level by local authorities. WildFish has since confirmed with planning authorities that they do not undertake CBAs for salmon farm applications, are under no obligation to do so, and lack the resources required.

To help address this evidence gap, WildFish and the Sustainable Inshore Fisheries Trust (SIFT) commissioned an exploratory CBA for a defined region: *Assessing the Economic Impact of Salmon Farming in Skye & Lochalsh*. Prepared by a former senior Scottish Government

agricultural economist and a Professor of Marketing at the University of Edinburgh Business School, the study demonstrates that the industry's claimed benefits are significantly overstated. Local economic gains are found to be limited; the industry extracts more value from Scotland plc than it contributes; and substantial operational costs are externalised onto communities, other marine sectors and the environment.

The Skye & Lochalsh CBA - [available here](#) - casts serious doubt on whether the priority afforded to open-net salmon farming within current policy remains justified. Ultimately, these questions can only be resolved through a comprehensive, independent national CBA.

As the Committee prepares to revisit progress on the issues raised in its January 2025 report, we hope that these emerging data and developments will support its scrutiny of whether the regulatory approach currently in place is adequate - and whether open-net salmon farming remains a viable and sustainable long-term industry for Scotland. We will seek to play an ongoing role in monitoring the risks inherent in the current expansion of the salmon farm industry and will share further analysis with the Committee in the new year to assist its consideration of these matters.

Our engagement with the Committee on these issues is rooted in a deep concern for the recovery of wild Atlantic salmon - an integral part of Scotland's natural heritage and a species that has also long provided sustenance, livelihoods and cultural meaning for communities across the country. The decline of wild salmon is not only an ecological failure, but a warning that the natural systems which have sustained people for generations are being pushed beyond safe limits. We therefore offer this evidence in the spirit of stewardship, and with the hope that the Committee's forthcoming scrutiny will help ensure that Scotland's approach to salmon farming is compatible with the long-term health of the rivers, seas and communities that depend upon them.

Yours sincerely,

Nick Underdown

Scotland Director,
WildFish