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26 January 2026

Finlay Carson MSP  
Rural Affairs and Islands Committee  
c/o Clerk to the Committee  
The Scottish Parliament  
Edinburgh  
EH99 1SP

Salmon farming in Scotland

Dear Mr Carson,

As you will be aware, wild Atlantic salmon are in crisis. They are classified as 'Endangered' and 'decreasing' in Great Britain as a result of a 30-50% decline in populations since 2006. The Atlantic Salmon Trust works to reduce the pressures that affect wild Atlantic salmon and the environment they depend on. One of these pressures is open pen salmon farming.

We have been following the Committee's work on 'Salmon farming in Scotland' very closely. We are pleased that the Committee will hold additional evidence sessions and hope that you will consider both the pausing of the sea lice regulatory framework and the apparent lack of progress on introducing penalties for escapes.

The [Atlantic Salmon Trust Position Statement on Open Pen Salmon Farming](#) (December 2025, also attached), reviews the evidence and impact that this sector has on the endangered wild Atlantic salmon. **In light of this evidence, we ask the Rural Affairs and Islands Committee to support a moratorium on the expansion of open pen salmon farming in Scotland.** This would send a powerful message to the government and industry that 'the status quo is (still) not an option'.

The Atlantic Salmon Trust's position on open pen salmon farming is:

1. We remain opposed to open pen salmon farming due to its negative impact on wild salmon and sea trout.
2. We call for a moratorium on the expansion of open pen salmon farming in Scotland.
3. We advocate for a transition to zero emission production methods.

In addition to our request to the Committee, we ask the Scottish Government to:

- enforce strong regulation for sea lice, escapes and disease from salmon farms immediately.
- adopt a moratorium on the expansion of open pen salmon farming.
- transition to zero emission production – no lice emission, no escapes and no disease transfer (such as closed containment).

The wild Atlantic salmon crisis demands bold action. We look forward to the Committee's further consideration and are happy to answer questions or help in any way we can.

Yours sincerely

Dr Wendy Kenyon  
Environmental Lead  
Atlantic Salmon Trust



December 2025

Atlantic Salmon Trust

# The Atlantic Salmon Trust position on **OPEN PEN SALMON FARMING**

Putting **Wild Salmon First**



# Wild Atlantic salmon are in crisis

Wild Atlantic salmon are in crisis. They are classified as 'Endangered' and 'decreasing' in Great Britain as a result of a 30-50% decline in populations since 2006<sup>1</sup>.

Due to the severity of the crisis, we are reviewing our position on key factors that impact wild Atlantic salmon and the environment they depend on. This paper reviews the impact and evidence in relation to open pen salmon farming. We set out our updated position in this statement. We will review it in one year.

## Open pen salmon farm production is increasing

The production of farmed Atlantic salmon in the North Atlantic for 2024 was 1,956,012 tonnes. The total catch of wild Atlantic salmon in 2024 was 364 tonnes, the lowest in the time-series since 1960. Norway and Scotland produce 79% and 9.5% of the farmed Atlantic salmon in the North Atlantic respectively.<sup>2</sup>

All countries in the north Atlantic with open pen salmon farms report negative impacts on wild salmon due to sea lice, escapes and disease. There is no evidence to show that open pen salmon farms can completely prevent these negative impacts on wild fish<sup>3</sup>.

## The science is clear

Recent studies confirm long standing evidence and demonstrate the harm that open pen salmon farming has on wild salmon and sea trout, in particular, by increasing sea lice loads and from escaped farmed fish.

The Scottish Government (2022) states that 'Salmon farms can substantially elevate levels of sea lice in coastal habitats and potentially increase risks to wild salmon growth and mortality under some local conditions.' It also warns that 'Escaped farmed Atlantic salmon can negatively impact wild Atlantic salmon through direct competition in fresh water. Breeding of escaped fish with wild Atlantic salmon can disrupt adaptive genetic selection with negative consequences for fitness and thus the viability of wild populations.'<sup>4</sup> Internationally, a NASCO briefing in 2025, states 'studies show reduced survival and adult returns in salmon exposed to salmon lice.'<sup>5</sup> It also reports 'increased mortality linked to salmon lice infestations in countries with significant salmon aquaculture, including Norway, Ireland, and Scotland'. On escapes from salmon farms, the NASCO briefing states that 'Introgression of wild Atlantic salmon is widespread across the North Atlantic and is the most serious threat for the viability and ability to adapt to current and future environmental changes.'

## The regulatory regime is failing

At an international level, the Williamsburg Resolution was adopted by NASCO in 2003.<sup>6</sup> Under Article 5, each Party to NASCO, including the UK, agreed to take measures, to:

- minimise escapes of farmed salmon to a level that is as close as practicable to zero...and
- minimise the risk of disease and parasite transmission between all aquaculture activities, introductions and transfers, and wild salmon stocks.

Subsequently, in 2009, NASCO and the International Salmon Farmers Association agreed to the following international goals<sup>7</sup>:

- 100% of farms to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms; and
- 100% of farmed fish to be retained in all production facilities.

Over 20 years on from the adoption of the Williamsburg Resolution, an international expert panel has judged that Scotland is failing to meet these international commitments<sup>8</sup>.

At a national level, in 2025, a Scottish Parliament Committee found a 'lack of progress made by the Scottish Government' in addressing the interactions between wild and farmed fish. The Committee 'seriously considered' calling for a moratorium on new sites and expansion at existing sites, to send a clear signal to the Scottish Government and industry that urgent progress is required. It concluded that it 'does not currently support a moratorium'<sup>9</sup>.

Once the Committee had reported, the salmon farming industry lodged 260 appeals against the Scottish sea lice regulatory system.<sup>10</sup> This new approach to regulating the impact of sea lice from farms on wild fish is now effectively paused. Today, in practice, there is no regulation of sea lice on fish farms relating to wild fish and no penalties when farmed fish escape.



## Scotland is falling behind its international partners

The continuing presumption against fish farm developments in the north and east of Scotland, to safeguard migratory fish species, is world leading. However, Scotland is now falling behind its international partners.

In 2024, the Canadian Government announced a ban on open pen salmon farming in British Columbia by 30 June 2029. It stated that 'Wild Pacific salmon are an emblematic species in British Columbia that face unprecedented threats to their survival. The Government of Canada is committed to protecting wild salmon and promoting more sustainable aquaculture practices.'<sup>11</sup> In support of this decision a policy

statement<sup>12</sup> was published, a draft transition plan<sup>13</sup> has been consulted on and a task force established to ensure the transition is managed effectively. In Norway in 2025, debate about 'zero emission'<sup>14</sup> salmon farming (no lice emission, no escapes, no disease transfer and no waste emission) is gaining ground.<sup>15</sup> Action in the wake of a Government White Paper and consideration in the Norwegian Parliament will lead to regulation of salmon farming which incentivises low impact operations. Regulation in Norway is evolving toward a more predictable, centrally managed, and environmentally demanding system.<sup>16</sup>

## The Atlantic Salmon Trust Position on Open Pen Salmon Farming

1. We remain opposed to open pen salmon farming due to its negative impact on wild salmon and sea trout.
2. We call for a moratorium on the expansion of open pen salmon farming in Scotland.
3. We advocate for a transition to zero emission production methods.

In light of the evidence and the Atlantic Salmon Trust's position, we ask:

- the Scottish Government to:
  - o enforce strong regulation for sea lice, escapes and disease from salmon farms immediately.
  - o adopt a moratorium on the expansion of open pen salmon farming.
  - o transition to zero emission production – no lice emission, no escapes and no disease transfer (such as closed containment).
- the Scottish Parliament Committee to reconsider supporting a moratorium.



## References

- 1 Darwall, W.R.T. & Noble, R.A. 2023. Salmo salar (Great Britain subpopulation). The IUCN Red List of Threatened Species 2023
- 2 NASCO (2025) ICES Advice, CNL(25)06
- 3 Salmon.info. <https://www.salmon.info/>
- 4 Scottish Government (2022) Scottish Wild Salmon Strategy
- 5 NASCO (2025) Policy Brief on the Effect of Salmon Aquaculture on Wild Atlantic Salmon Populations, CNL(25)18
- 6 NASCO (2006) The Williamsburg Resolution, CNL(06)48
- 7 NASCO (2009) Guidance on Best Management Practices to address impacts of sea lice and escaped farmed salmon on wild salmon stocks, SLG(09)5
- 8 NASCO (2024) Sixth Interim Report of the Implementation Plan/ Annual Progress Report Review Group for the Review of Implementation Plans under the Third Cycle of Reporting (2019 – 2024), CNL(24)17
- 9 Scottish Parliament (2025) Rural Affairs and Islands Committee Follow-up inquiry into salmon farming in Scotland. SP Paper 720 1st Report, 2025 (Session 6)
- 10 Cabinet Secretary for Rural Affairs, Land Reform and Islands (2025) Scottish Government interim update on activities in response to the Rural Affairs and Islands Committee report on 'Salmon Farming in Scotland'
- 11 Government of Canada (2024) Responsible, Realistic, and Achievable: The Government of Canada announces transition from open net-pen salmon aquaculture in coastal British Columbia. News Release. Fisheries and Oceans Canada
- 12 Government of Canada (2024) Protecting wild Pacific salmon: the transition from open net-pen salmon aquaculture to closed containment systems in British Columbia coastal waters. Fisheries and Oceans Canada
- 13 Government of Canada (2024) Draft Salmon Aquaculture Transition Plan for British Columbia. Fisheries and Oceans Canada
- 14 Government of Canada (2025) Salmon aquaculture transition in British Columbia. Fisheries and Oceans Canada
- 15 Sign the petition now - Close the Pens (2025)
- 16 Norske Lakseelver (2025) Pers. Comm.



Atlantic Salmon Trust

## Our Mission

To restore wild Atlantic salmon  
and their environment

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