

Mr F Carson  
Convenor  
Rural Affairs & Islands Committee

(by email to the Committee Clerk)

Dear Mr Carson

14 February 2026

***Rural Affairs and Islands Committee - Salmon Farming in Scotland.***

I hope that you will be able to accept this material, which refers to two items known to me after my earlier submission was sent by email on 12 February 2026. Both items are relevant to part of my statement.

Specifically, I referred to this under C. Mortality data.

*'No one can claim to be interested in the welfare of cleaner fish if they are uninterested in knowing how many are present on farms and how they die.*

*The data for cleaner fish is there, what is needed is publication*

*The data about farmed salmon mortalities is not comprehensive or in one place. Some sources measure mortality in tonnes of fish (SEPA), some as percentages only (Salmon Scotland), some as numbers of fish (FHI). The Fish Health Institute's weekly mortality data is not comprehensive as it only records mortalities over a certain percentage (for example 0.5% and 1% depending on the time of year), and does not cover the first 6 weeks of a farm being stocked (when mortalities are often significant). Culls of fish and deaths in transportation also are omitted.'*

1. On 4 January, I requested my MSP, Emma Roddick, to ask this question of Ministers -

*'Why is it that the government and the SAWC ignore that fact that, for years, cleaner fish mortality data has been collected by salmon businesses (as evidenced by FHI case reports and confirmed to SAWC by Salmon Scotland)? What is required is publication. Is it not the case that to argue that industry would be further burdened is untenable?'*

I received the attached reply from the Cabinet Secretary dated 27 January via Ms Roddick late on 12 February (attached). The Cabinet Secretary wrote *inter alia*

*'Any further data collection needs to be carefully balanced against regulatory requirements. Additional data is not required for regulation, and its provision would generate data collection, handing and processing by producers at both a site and company level, as well as by the Scottish Government's Fish Health Inspectorate, and this is disproportionate to the regulatory need.*

*Scottish Government takes the welfare of farmed animals seriously and robust legislation and policies are already in place to protect farmed fish health and welfare, and the amount of information in the public domain relating to salmon farming is greater than in comparison to terrestrial farming sectors. In addition, many producers already give a high degree of care to cleaner fish with staff dedicated to husbandry, and with welfare strategies, feeding regimes and health monitoring in place.*

*However, as I set out in my response to the Rural Affairs and Islands Committee, I have committed to explore how to gain greater insights into cleaner fish health and welfare outcomes and I will provide an update on this in due course. Your constituent may also wish to note that to progress farmed fish welfare, I have committed to introduce official welfare guidance for farmed fish, and this will also apply to cleaner fish.*’ (underlining added)

2. On 12 February, a report by the Scottish Animal Welfare Commission on Good Food Nation Animal Welfare Indicators was published on the Government’s website. The report was in response to a request from the Cabinet Secretary for Rural Affairs, Land Reform and Islands for recommendations on animal welfare indicators which could form part of measures in future iterations of the Good Food Nation (GFN) plan.

Under Section 5.2, Level 2 indicators are described as ‘*more specific indicators for some species (and includes some positive welfare aspects), which may cover a wider range of the Five Domains, but whether the data on these could be obtained is not currently known.*’

At i) on-farm mortality data (including fish), it states ‘*numbers of animals (not always collected but this might encourage this level of data collection which is extremely important for welfare management and could be a way to ensure there is more oversight); ‘black loss’ is a vague term used in some species but such vagueness does not support active management to reduce losses.*’

This is elaborated upon -

‘*On farm mortality rates, particularly of young animals, can provide an unambiguous welfare indicator, although these records may not be kept or communicated. Rates of losses of animals, including fish species, at key life stages (e.g. birth, weaning, finishing, involuntary culling of breeding animals, losses when transferring from one stage to another such as hatch to setting in poultry, transferring to sea cages in fish) can provide information on vulnerable time points as well as allow monitoring of improvements in practice over time. A recent SAWC report on fish sentience<sup>59</sup> also highlighted the need to consider animals as individuals, and not weight of the species, which is important when considering welfare as the individual quality of life experience of animals. In addition, in some species (fish, sheep), unexplained losses are considered as ‘black loss’ and may reflect some acceptance of mortality within the industry. However, loss of animals reflects some degree of animal suffering and poor welfare, and monitoring of losses can provide an ‘iceberg’ indicator for welfare and a benchmark for improvements.*’

*However, we firmly believe that improved data collection and curation is fundamental to making improvements in animal welfare, and to allowing a more robust understanding of the state of animal welfare in Scotland. It is clear that data are being collected by many different sources, sometimes a similar trait but by different measures, and the data landscape is fragmented and challenging to understand and utilise. However, this is likely to be an area that receives a lot of attention in the near future as utilising disparate data sources to allow data-driven innovation and decision-making becomes more and more important. Consideration of methods that can make this effective, and not overly burdensome on any one sector, is likely to be very important in future versions of the Good Food Nation plan.* (all underlining added)

I make the following observations on the above

- a. the Cabinet Secretary's view about the role of mortality data is overly limited. References are made to regulatory requirements and need. What we need goes beyond the current scope of the FHI's published data, which is not comprehensive.
- b. the FHI published mortality data has gaps which have been evidenced to the Inquiry, including the omission of any mortalities in the first 6 weeks of salmon being put into cages. This is at odds with SAWC's advice about '*collecting data at vulnerable time points*' such as fish being transferred to sea cages.
- c. reference by the Minister to '*additional data*' for cleaner fish is misleading. There is no such data published.
- d. in contrast, the SAWC report sees a much wider role for the publication of mortality data, as signifiers of the state of animal welfare – '*...we firmly believe that improved data collection and curation is fundamental to making improvements in animal welfare, and to allowing a more robust understanding of the state of animal welfare in Scotland.*'

I hope that the Committee will reiterate the recommendations in the January 2025 report calling for mandatory and comprehensive mortality data for fish, including cleaner fish, in both the fresh water and marine production phases.

sincerely

Roddie Macpherson  
Black Isle