

Finlay Carson MSP



29<sup>th</sup> September 2025

Dear Finlay,

**The Rural Affairs and Islands Committee report on salmon farming in Scotland  
17<sup>th</sup> January 2025**

Scotland's salmon sector would like to provide an update on progress and on ongoing activities that are relevant to the Committee's work on salmon farming. This letter details developments, including:

- Significant improvements in overall biological performance, fish growth, and productivity during 2025.
- Record survival figures for January-August 2025 (92.3%).
- Continuing consumer demand, both domestically and internationally, with the sector on track for record exports in 2025.
- Strong regional economic impacts.
- Record low antibiotic use figures for 2024 (down to 5.1mg/kg).
- The publication of a refreshed Code of Good Practice, which includes updates to key standards covering fish health and welfare.
- Continued commitment to third-party assurance schemes, with over £10million invested in audits and inspections in 2024.
- Successful developments for semi-closed farming systems in Scotland; and
- The commissioning of independent analysis on sector research and innovation.

**Fish health, welfare and productivity**

During the Committee's inquiry, we updated on the c. £1 billion investment that salmon farmers had made in fish health and welfare since 2018. This investment has supported fish health and welfare across all areas, with growing health management teams, enhanced training, a heightened focus on preventative health management, and investment in a wider range of overall management tools



to ensure fish health and welfare. Sea farm monitoring and diagnostic services are cutting edge. We now have sea samples assessed on farms or local laboratories every day. That tells fish farmers what is happening in the marine environment and what they need to do in real time, giving our farmers more information than they have ever had before to look after their fish.

This investment has also supported the development of more strategic approaches to farming fish, which are specifically targeted at improved fish health and welfare: -

- the development of farms in more exposed locations,
- the use of nursery farms,
- strategies to shorten the marine phase of the production cycle and
- closing or consolidating farms in areas with environmental challenges.

This investment is paying off. Alongside improvements in fish health, welfare and survival (see below), salmon farmers are reporting significant improvements in overall biological performance, fish growth, and productivity. For example, Mowi Scotland have reported the highest ever quarterly harvested volume in Q2 2025, with Scottish Sea Farms reporting good fish growth and productivity in the same quarter. The sector anticipates 2025 as a strong year for productivity and overall production output.

### **Fish harvested**

We previously updated the Committee that fish survival in 2024 had been significantly improved over 2022 and 2023. Our sector recorded an overall improvement in marine survival of 10%, between 2024 and 2023 (82.3% v. 72.3%). We are pleased to report that this trend has continued in 2025. Survival in the first half of 2025, and to date, has exceeded expectation, with record figures. ***The January to August 2025 figure is 92.31%***, which is the lowest since we first started publishing in 2018.

This is testament to the hard work of the sector's farmers, veterinarians and fish health professionals, as well as the £1 billion invested in fish health and welfare since 2018.

### **Domestic and international consumer demand**

Our sector is immensely proud that farm-raised Scottish salmon continues to be in high demand both domestically and internationally. At home, salmon is the most popular fish at retail, with sales reaching £1.5 billion in 2024. These sales

reflect not only consumer preference for Scottish salmon, but also the strict standards underpinned by legislation, alongside additional and rigorous auditing carried out by retailers and customers across the country. Globally, Scottish salmon is the UK's number one food export, with £844 million worth exported in 2024. Data for 2025 suggests that the sector is on track for another record year, with exports likely to exceed £1 billion for the first time. Scottish salmon is exported directly to around 50 markets each year, with further reach achieved through hub markets. Exports to the European Union remain the most significant in both volume and value terms, while North America, Asia and the Middle East are experiencing strong growth. Supplying international consumers with premium, high-quality Scottish salmon provides producers with flexibility in managing seasonality, confirmation of demand, and consistent supply.

The Committee will be aware of the UK-India trade deal that reduces tariffs from 30% to zero when it is ratified in the first half of 2026. This is an immensely exciting new market for salmon from Scotland, and we would hope that the Committee would support our desire to develop market share in India.

### **Regional economic value**

The strong consumer demand for Scottish salmon translates directly into significant value for Scotland's economy. The sector contributes over £760 million in Gross Value Added (GVA) annually and directly employs over 2,500 people in salmon production. These are skilled, well-paid jobs that form the backbone of one of Scotland's most important food sectors.

Production is focussed around the west coast, highlands and islands of Scotland and provides an immediate and direct impact to local economies of more than £300 million. In many of these rural and economically fragile areas, salmon farming is the primary source of year-round employment. It helps retain young people, supports families, and sustains population levels in communities where alternative opportunities are limited. The impact extends far beyond direct production. Across Scotland, salmon farming supports more than 10,000 jobs when indirect and supply chain activity is included, spanning over 3,600 businesses adding a further £460 million in terms of economic contribution. These links range from feed suppliers, further processing, boat building and engineering to veterinary services, packaging companies, and logistics providers.

This broad reach means that every Scottish constituency benefits from the industry, underlining salmon farming's role not only as Scotland's number one food export but also as a vital driver of prosperity nationwide.

### **Antibiotic use**

Medicines are an integral part of health management for any farmed or companion animal, as well as for us as humans. Across society, we must use medicines responsibly, and this is so with antibiotics. Since 2017, the salmon farming sector has been a member of RUMA, the Responsible Use of Medicines in Agriculture Alliance, and in particular RUMA's Targets Task Force initiative (TTF), which is specifically focused on antibiotic stewardship. RUMA and TTF are unique as the only truly cross livestock (terrestrial and aquatic) initiatives of their kind. RUMA and the TTF do not promote zero antibiotic use, but instead focus on responsible use, with the mantra "as little as possible, but as much as necessary".

It is through RUMA and TTF that livestock sectors report their antibiotic use data each year, with those figures also provided to the Veterinary Medicines Directorate, for inclusion in their annual Veterinary Antimicrobial Resistance and Sales Surveillance (VARSS) report.

We have recently reported our 2024 antibiotic use figures to RUMA and the VMD (ahead of their respective publications in November) and have seen a significant reduction in overall use. In 2024, antibiotic use dropped to 5.1mg/kg, a reduction of nearly 80% compared to 2023, and the lowest use since records were first collected as part of the TTF initiative in 2017. Furthermore, use is restricted to a small number of farms. Antibiotics were used on 8% of all farms in 2024 (7.1% of seawater farms and 10.6% of freshwater farms). This reduction is, again, testament to the hard work and diligence of farmers, veterinarians and fish health professionals, as well as to the significant investment companies have made in the management of fish health and welfare since 2018.

### **The Code of Good Practice for Scottish Finfish Aquaculture (COGP)**

The COGP was created in 2006 and has since become the leading good practice standard for Scottish fish farming. It was first developed following a recommendation from Scottish Government in its 2003 Strategic Framework for Scottish Aquaculture, which argued that such a code of practice could, in part, reduce the need for "...costly and inflexible regulation".

The COGP is the only one of its kind amongst salmon farming nations. It covers all key aspects of fish production, creating a high baseline for farming practice on which several aspects of statutory legislation have since been based including farm biosecurity, fish health and welfare.

All salmon farms in Scotland adhere to the standards set out in the COGP, with independent third-party audits taking place. This means a requirement for remedial action within 28 days of any non-compliance being noted. The robust nature of the COGP has underpinned standards in a number of other third-party assurance schemes which recognise that farms already participate in the COGP.

The COGP is subject to a process of continuous review that recognises developments in science, technology, innovation and good practice. A refreshed COGP will be published in early October covering dedicated veterinary statements, the legal responsibilities of vets, the use of cleanerfish, standards on physical lice removal technologies, integrated fish health management practices, disinfection protocols, and the use of HACCP principles within the sector.

The Government's 2003 Strategic Framework for Scottish Aquaculture, said, "a robust, audited code of practice does obviate (in part) the need for detailed, costly and inflexible regulation". We concur.

### **Farm and Welfare assurance**

Compliance with independent standards and codes of practice demonstrate to consumers the sector's high standards of production, fish health and welfare management, environmental stewardship, and sustainable and responsible farming practice. In 2024, over 1600 audits were conducted by certification bodies and standards owners with producers investing over £10million in compliance related systems, verification activities and associated audits.

Audits were undertaken against a variety of national and international standards, including the COGP, RSPCA Assured, Aquaculture Stewardship Council (ASC), Global GAP, The Soil Association organic standards, retailer standards and Global Food Safety Initiative (GFSI) standards such as BRCGS.

Together these ensure the highest standards of fish health and welfare on Scotland's salmon farms. They are a non-negotiable pre-requisite for UK retailers: without demonstrable compliance with these standards, companies would not be able to sell their fish.

These assurance schemes drive health and welfare practice well in advance of any legal minimum. The Sector maintains a long-standing association with the RSPCA standard. RSPCA Assured remains the “gold standard” for fish welfare, and the scheme provides the template for other, similar schemes in other farming nations. Assurance schemes regularly update and strengthen their standards. This reflects technological advances and increasing evidence for good practice.

### **Developments in semi-closed containment systems - innovation**

The sector develops an ever-wider range of strategic approaches to farming salmon in the marine environment. Open sea net pen systems will remain the primary approach for rearing fish. Companies are investigating the use of semi-closed and closed farming systems. In 2024, the SeaQureFarming Ltd was established with the specific purpose of developing an innovative, semi-closed farming system in Scotland. SeaQureFarming Ltd is a Scottish business, with the original concept developed by GaelForce Marine.

In April 2025, SeaQureFarming Ltd announced the purchase of farming assets from Dawnfresh Farming, allowing the further development of its semi-closed technology to commercial field trials, with a goal of full commercialisation in Scotland.

On 26th August 2025, following a protracted process, Scottish Ministers granted Loch Long Salmon (LLS) planning permission for their innovative semi-closed salmon farm in Loch Long.

### **Research and Innovation**

The sector has commissioned an independent survey on research and innovation since 2018. We will provide the Committee with the final report. Since 2014, the Sustainable Aquaculture Innovation Centre (SAIC) has provided a key funding mechanism for research and innovation. We were disappointed that the Scottish Funding Council ended its funding of SAIC in 2023. We continue to encourage the Scottish Government in its development of a replacement funding mechanism for the aquaculture sector. We are committed to match fund research and innovation projects.

### **Continuity with Scottish Government policy**

We would wish the Committee to recognise our sector’s alignment to Scottish Government policy across Aquaculture, Blue economy, Exports and Food Security.

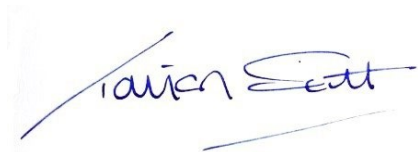
We hope the Committee wish to see our sector develop in serving existing and new markets such as India. We cannot develop as businesses, with a threat of moratorium. We welcome the fact that the Scottish Government do not support the Committee's position on this.

### **Conclusion**

We trust this update is of value to the Committee and their interests in Scottish salmon farming. The achievements discussed herein have only been possible through the considerable hard work and investment of salmon farmers that farm across Scotland's west coast and Northern and Western Isles.

Should you require any further information on the points raised in this letter, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in blue ink that reads "Tavish Scott". The signature is written in a cursive style with a long horizontal stroke at the end.

Tavish Scott

CEO Salmon Scotland