



John F. Robins
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Our Reference: 202100241816

13 October 2021

Dear John F. Robins,

Thank you for your letter of 14 September 2021 to Lorna Slater MSP, Minister for Green Skills, Circular Economy and Biodiversity and Patrick Harvie MSP, Minister for Zero Carbon Buildings, Active Travel and Tenants' Rights about your concerns over the welfare of farmed fish. I have been asked to respond.

We support the sustainable development of aquaculture as a significant employer and economic contributor, especially in many of our most remote and fragile rural communities. However, we are clear that growth of the aquaculture industry must be sustainable and this includes the need to take account of the natural marine environment and to have high regard for the health and welfare of farmed fish.

As you know, the welfare of farmed fish is protected under the Animal Health and Welfare (Scotland) Act 2006, which as well as making it an offence to compromise animal welfare by, for example unnecessary suffering or abandonment, places a duty of care on those responsible for animals to ensure that their welfare needs are met.

In Scotland fish farming is overseen by a number of regulators, including Marine Scotland, SEPA and local authorities. All fish farms in Scotland are regularly inspected by Marine Scotland fish health inspectors. They will report any significant case of poor welfare to the veterinarians in the Animal and Plant Health Agency (APHA), who are responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. Please note, we have forwarded the videos attached to your e-mail, to the APHA with a request for your complaint to be investigated.

In addition, around 80% of Scottish salmon is farmed to the RSPCA's "RSPCA Assured" scheme. The RSPCA welfare standards cover all aspects of the fish's lives, including health, diet, environment, care and handling.

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The independently audited Code of Good Practice for Scottish Finfish Farming which has also been adopted by Quality Trout UK, includes sections on fish welfare and care including stocking densities. The adopted 'Code of Good Practice Annexes' note that Veterinary Health Plans and Biosecurity Plans must be prepared by each fish farming company in collaboration with its veterinary surgeon and that a documented training programme must include training on all aspects of farmed fish husbandry.

Turning to your concerns on sea lice, escapes and steelhead trout farming; with regard to sea lice, we have strengthened the farmed fish sea lice compliance framework and we are committed to strengthening it further this year, unless there is evidence to the contrary. We are also acting upon the Salmon Interactions Working Group's (SIWG) recommendations to introduce a significant change in the way sea lice emissions are regulated and fish escapes are controlled. Further detail can be found in [the Scottish Government response to the Salmon Interactions Working Group report](#).

On escapes, there are a number of actions outlined in the response to the SIWG report, including a commitment to take forward a programme of work to make fish farm containment measures and regulation more robust, such as the introduction of penalties for fish farm escapes, with the ultimate aim of ring-fencing or redistributing this money to support wild salmonid conservation and research.

Steelhead trout are the anadromous (sea migrating) form of rainbow trout. The risk of escaping steelhead trout entering rivers to displace native brown trout populations is unlikely and is considered through the licensing regime for the, [Introduction of freshwater fish and ova: forms and guidance - gov.scot \(www.gov.scot\)](#). There is no evidence that self-sustaining populations of these fish exist in Scotland.

Through various workstreams, we are committed to working collaboratively with a range of key stakeholders on improving fish health and related welfare.

Yours sincerely

Panos Pliatsikas
ARF : Aquaculture Unit

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