

RSPCA submission to the Scottish Affairs Committee on salmon farming

1. The RSPCA is pleased to respond to this inquiry looking at UK salmon farming. The RSPCA is the oldest and largest animal welfare organisation in the world, set up in 1824 to investigate farm animal welfare complaints through our inspectorate. We now work to improve farm animal welfare through two main work streams: campaigning to improve legislation, mainly in England and Wales, to raise the legislative baseline for farmed animals and secondly by developing higher welfare standards for use on farms to ensure farm animals live a better quality of life and to provide the consumer of meat (including farmed fish), dairy and egg products a higher welfare solution. This is achieved through the RSPCA Assured scheme. The RSPCA writes the welfare standards used by RSPCA Assured, the UK's only animal welfare assurance scheme that sets higher animal welfare standards. This was set up in 1994. RSPCA Assured accounts for around 75-80% of salmon production, around 55-60% of egg production and 23% of pig production in the UK.
2. In 2022 salmon farming generated £324 million, 7% of the Scottish economy and supports 12,000 jobs. Salmon is Scotland's (and the UK's) main food export. Around 75-80% of the salmon industry in Scotland produce under RSPCA standards as members of RSPCA Assured.
3. The RSPCA is an animal welfare organisation that operates mainly in England and Wales, working closely with its sister organisation the Scottish Society for the Prevention of Cruelty to Animals (SSPCA) in Scotland on legislative matters. The RSPCA sets farm standards for nine different species including two fish species and those standards will be taken up by farmers all over the UK and Ireland. As salmon is primarily farmed in Scotland, the majority of farmers that use RSPCA standards on salmon are based in Scotland.
4. The RSPCA's welfare standards are publicly available on our website (<https://science.rspca.org.uk/sciencegroup/farmanimals/standards/salmon>). The salmon standards were first devised over 20 years ago and have been revised and updated on a number of occasions since, including this year. There has been significant progress to improve the lives of farmed salmon since the standards were first established, and the RSPCA standards have played an important role in this progress. Changes driven by the standards include requiring a lower stocking density than used in other salmon farming countries, introducing a '15 second rule' minimising the time fish can be removed from water for handling, detailed requirements to ensure good water quality on freshwater farms, making CCTV mandatory for the whole slaughter process, and banning inhumane slaughter methods.
5. There are more than 1200 individual standards that RSPCA Assured salmon farms have to meet. The number of new standards required for salmon increased by 269 alone during the most recent update to the welfare standards in 2024. RSPCA Assured requires farms to meet all applicable salmon standards and take action when they aren't. Whilst average non-compliances were higher for this species (n.b. the total number of auditable standards for salmon is higher than other species), the independent review has confirmed that the vast majority of standards are being complied with. The salmon standards cover the whole of the animal's life (from hatching through to slaughter) which must be met for a salmon product to carry the RSPCA Assured logo. These standards include the welfare of cleaner fish too, and were the first of their kind to include cleaner fish. The RSPCA standards are entirely focussed on improving the welfare of these animals and, for example, include the requirements for each farm to have veterinary health and

welfare plans to help safeguard the welfare of the fish. The standards also set a maximum stocking density (space allowance).

6. RSPCA Assured is both self-financing and non-profit making. The only income RSPCA Assured receives is an annual membership fee from its members (hatcheries, farms, hauliers and abattoirs) and a licence fee for the use of the RSPCA Assured logo. These fees are reinvested back into the scheme to help cover running costs and bring about further welfare improvements, and not taken as profit by RSPCA Assured or the RSPCA. The RSPCA obtains no income from RSPCA Assured. RSPCA Assured is a separate charity and is a wholly owned company registered at Companies House. Salmon farms that are members of the RSPCA Assured scheme are assessed regularly by a dedicated team of RSPCA Assured assessors to ensure all the animals are raised to the RSPCA's strict higher welfare standards. Assessments can be announced or unannounced. All complaints on a farm are taken extremely seriously and are thoroughly investigated by RSPCA Assured to validate any allegations that have been made. Any serious allegation of non compliance with the law are passed to the relevant statutory agency in Scotland for further investigation.
7. If a member is found to have breached the RSPCA welfare standards, RSPCA Assured membership agreement or other policies then a number of sanctions are available as appropriate. These range from informal advice, formal warning to temporary or permanent withdrawal of membership. The RSPCA Assured scheme is accredited by UKAS and uses SCI as an independent certification body who certify all RSPCA Assured farms, oversee all decision making in regards to awarding and removal of certificates, and provide support and advice as RSPCA Assured apply sanctions to members. Salmon farms can and have been suspended by the scheme if relevant standards are not followed and adhered to, and this has been the case with some salmon farms in the past. If a non-compliance with the standards is identified, the member has the opportunity to rectify the issue within a given time scale (depending on the nature of the issue). If the non-compliance is adequately addressed then membership can continue.
8. The aim of the RSPCA welfare standards and of the RSPCA Assured scheme is to continuously drive up standards and improve on-farm practices. RSPCA standards exceed minimum legal requirements and standard industry practice. For instance on salmon RSPCA standards set a maximum seawater stocking density which is half that permitted in the eastern USA and set standards on slaughter and transport of salmon which are at present not covered in detail under British legislation.
9. The RSPCA agrees that enforcement of our standards is crucial. All RSPCA Assured member farms are visited every year as a minimum. Following an undercover investigation into RSPCA Assured farms this year, the RSPCA commissioned an independent audit report on enforcement of the standards. This has now reported and is available on the website. This independent auditor investigation found that 93% of farms were either meeting all standards successfully, or had fewer than five non compliances. Whilst many non compliances were administrative, there were some issues directly impacting animals. Salmon farms did have a higher rate of non compliances than other species with an average of six per farm, compared to 1.5 for other species. However, the welfare standards for Atlantic salmon do have more auditable standards than the other species. The RSPCA acknowledges there are still significant challenges around salmon farming and will be looking at next steps to drive further improvements as a result of this review including improved enforcement and a further development of the standards. As a result of the 20 recommendations in the report, RSPCA Assured is modernising its assessment programme to significantly increase visits. Enforcement will be stepped up including significantly increasing unannounced visits and using technology, such as body worn cameras and CCTV, to give comprehensive and real-time welfare

insights. The RSPCA fundamentally believe that it is right to give salmon being farmed better protection than baseline standards , and continue to monitor and drive up their welfare through the scheme. We are addressing these issues by updating the standards and improving enforcement as laid out above.

10. Farmed salmon should, but do not at present, have equal welfare provisions to land farmed animals. At present only fish farmed under RSPCA Standards are fully protected at the time of slaughter and during transport which are not covered by specific minimum legislative standards unlike farmed land animals. The RSPCA would like to see the Scottish and English Governments introduce detailed and species-specific standards on slaughter. Whilst slaughter is not the biggest welfare concern in salmon farming it is one of the easiest to address. Slaughter standards for land animals should be replicated appropriately for aquaculture, every animal stunned before slaughter and CCTV mandatory in abattoirs or equivalent facilities. The RSPCA welfare standards mandate that all fish are stunned before being killed, with electrical stunning and/or percussive stunning with bleeding provided as the solution. The RSPCA standards also outline prohibited inhumane methods and require regular monitoring of stunning efficacy, with measures in place to rectify any identified issues or concerns during slaughter. The lack of species-specific welfare legislation for farmed fish in the UK, and the subsequent over-reliance on voluntary welfare standards and accreditation schemes, has the potential to leave millions of fish unprotected by any form of regulation if those schemes or standards were to be removed or if farmers choose not to participate. Many other countries which farm fish have developed legislation to safeguard farmed fish welfare throughout the lifecycle and the UK is falling behind these other countries rapidly.
11. Mortality reporting in salmon farming is more transparent than any farmed land animals in the UK or any other salmon farming globally, with data being published on the Scottish Government website¹ and on the Salmon Scotland (the producers organisation) website. Mortality of fish will sadly occur throughout the lifecycle of farmed fish, just like any farmed species. Mortality in farmed salmon is not necessarily an issue with poor husbandry but is often more related to external environmental factors. Farmed salmon mortality does not necessarily equate to poor welfare but the RSPCA agrees that mortality in salmon farming is too high at around 25% annually. The RSPCA is taking steps to reduce mortality on farms that use the RSPCA standards under the RSPCA Assured scheme. Mortality in recent years have been linked to issues such as higher water temperatures, caused by climate change, which has increased jellyfish incidence and algal blooms. For instance in 2022 and 2023 the micro-jellyfish *Muggiaea atlantica* and *Apolemia uvaria*, caused problems for a significant proportion of Scotland's salmon farms. Many species of jellyfish and plankton can have a significant negative impact on salmon health and mortality but progress is occurring. Solutions to algal blooms and jellyfish on monitoring, management and mitigation are being investigated by institutions such as the Sustainable Aquaculture Innovation Centre and other research institutes, veterinary providers and technology suppliers. The RSPCA actively encourages progress in this area and will include findings in the welfare standards as appropriate.
12. The RSPCA salmon standards do not have explicit standards on maximum farm mortality but mortality is reported from RSPCA Assured farms on a weekly basis if it reaches above set thresholds. This reporting includes providing causes of mortality and steps to be taken to rectify or manage the incident. As appropriate, this will be followed up by RSPCA Assured. The RSPCA intends to develop standards on jellyfish and plankton monitoring in future editions based on on-going work within the sector. In 2024, the RSPCA formally introduced regular welfare outcome assessments into the Atlantic salmon welfare standards, based on the scoring of welfare indicators such as scale loss, fin scores, eye damage. For the

¹ <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/RAI-02-10-2024?meeting=16039&iob=136946>

first time, standards were developed and implemented for non medicinal treatment such as thermal delousers and freshwater bathing. These can have significant welfare impacts and the introduction of dedicated standards could mitigate, reduce and eliminate these negative impacts.

13. The direct impact of lice and their treatment on farmed fish welfare is one of the largest challenges facing the Scottish salmon industry. The RSPCA believe that prevention of lice infection is far better for salmon welfare than treatment. The RSPCA welcomes the development of the Sea Lice Risk Framework by the Scottish Environmental Protection Agency (SEPA) and believes that modelling can be partly used as a preventative tool. For instance, permission to develop new or expand existing sites should only be granted where it can be reasonably presumed that the placement and size of the site will have no or minimal impact on the other farms around it and on any wild fisheries. However, the RSPCA also acknowledges concerns about the impact on farmed fish welfare by requiring treatments and/or handling for sea lice which may not be in the best interest of the farmed fish. Further work should be done on preventing sea lice infestation such as developing lice shields/other containment systems on farms to mitigate all concerns.
14. Whilst sea lice remains an important welfare issue for farmed fish welfare, it is not the only important factor on mortality/welfare. Gill disease or heart disease can be just as important and the RSPCA is involved in much work on reducing the impacts these issues have on fish health and welfare. As appropriate, the RSPCA would include findings and learnings in the welfare standards for Atlantic salmon.
15. The RSPCA was the first to set welfare standards for cleaner fish. These came into effect in 2018 after years of development. Currently, the level of mortality of cleaner fish is unclear, so ultimately the RSPCA would like to see no cleaner fish being used as they are replaced by other methods to prevent sea lice infection but in the interim we believe the most sustainable way forward on the use of cleaner fish is to rely on hatchery reared fish. The Scottish Animal Welfare Committee is undertaking an enquiry into the welfare of cleaner fish which is due to report in 2024. The RSPCA will look at and assess any recommendations that are made by the Committee and urge the Scottish Government to implement measures across all fish farms.
16. The RSPCA standards focus on animal welfare so any impacts on the environment are not a core focus of the RSPCA welfare standards but we agree that that development of new sites, or expansion of existing sites (the main areas where a regulatory system impacts), should take into account the impact that an increased number of fish within a certain water body will have both on that farm and those farms surrounding it, and what impact this will have on the welfare of all the fish being farmed in the relevant locations. Progress has occurred to prevent the escape of farmed salmon and its potential impact on the wild salmonid population. Recent changes in practices and regulations, setting farm standards to ensure containment of fish on fish farms seems to be having a positive impact as according to Scotland's Aquaculture website². The last substantial escape of farmed salmon in Scotland was in June 2022 and only one fish is documented to have escaped this year¹.
17. The RSPCA agrees that a new regulatory system is needed whereby each active farmed salmon site is reviewed, assessed and reapproved at the end of each cycle and that fish numbers, maximum allowable biomass and any other relevant control mechanisms are set based on the prior performance. A system like this would reward and encourage good practices and discourage and disincentive poor practices. However salmon farming is one of the most transparent industries reporting its data on mortality to the Scottish Government monthly for dissemination on their website, unlike any farmed land animals.

² https://aquaculture.scotland.gov.uk/data/fish_escapes.aspx