



From: \$camon \$cotland

To: Scottish Ministers, SEPA, Nature Scotland, APHA Scotland, Scottish Animal Welfare Commission, Scottish Parliament Cross-Party Group on Animal Welfare & Scottish Parliament Rural Affairs, Islands and Natural Environment Committee

Cc: RSPCA Assured, SSPCA, ASC, Soil Association, Inside Scottish Salmon Feedlots, Edward Mountain MSP, Arianne Burgess MSP, WildFish, Coastal Communities Network, Atlantic Salmon Trust, Fisheries Management Scotland, Salmon Scotland, Compassion in World Farming, OneKind, Animal Concern, Advocates for Animals, Animal Law Foundation, Animal Equality, Ecohustler, WWF, Scotlink, Advertising Standards Agency, Competition and Markets Authority, Client Earth, Sustainable Seafood Coalition & other stakeholders

Date: 11 November 2022

Subject: Scottish Salmon's Mortality Crisis – Urgent Action Needed to Avert Welfare Disaster!

Today, on Remembrance Day when we remember the millions of people who gave their lives in the line of duty, could we please stop to gauge the level of horror and death currently being played out inside salmon farms across Scotland (99% of which are believe to be certified via RSPCA Assured, ca. 15% certified as 'responsible' via the ASC and 6% certified by the Soil Association as 'organic')?

It is clear from mortality data [published this week \(9 November 2022\) by Salmon Scotland](#) that the scale of the welfare nightmare has reached record levels with 2.8 million dead farmed salmon reported for the month of September alone (that figure comes [direct from Salmon Scotland](#)).

If 2.8 million farmed salmon die each month during 2022 then that's a staggering 33.6 million morts! Sadly, we don't know the real figure because Salmon Scotland will not share the figures (back in 2013 the industry [successfully lobbied SEPA not to publish mortality numbers arguing that disclosure would be 'commercially damaging'](#)).

\$camon \$cotland [estimate that ca. 50 million salmon may die from hatch to 'catch'](#) (i.e. from eggs in the hatchery through freshwater production in hatcheries and smolt farms to final harvest in sea cages). The last time we have data for mortality numbers is 2012 and 8.5 million morts were [reported in the sea phase of production alone \(equating to 13,627 tonnes of dead fish\)](#). Since the weight of farmed salmon mortalities – [as reported by salmon farming companies and published by SEPA](#) – was nearly 30,000 tonnes in 2021 an estimate of 20 million morts in the

sea phase of production for 2021 is reasonable (i.e. we know from previous data that ca. 10,000 tonnes of dead fish = 7 million).

Data [published by the Scottish Government on 27 October 2022 via the ‘Scottish Fish Farm Production Survey 2021’](#) fleshed out the scale of the mortality in sea cages when it reported a ‘survival rate’ of 75.4% (i.e. mortality rate of 25.6%) in 2019 (the latest data we have):

#### Survival and Production in Smolt Year Classes

Table 28: Survival and production in smolt year classes during 2002-2021

Year of smolt input	Smolt input (000's)	Harvest year 0				Harvest year 1				Harvest year 2				Total % of year class harvested (survival)	Year class weight (tonnes)	Yield per smolt (kg)
		Number (000's)	Weight (tonnes)	Mean weight (kg)	% harvest	Number (000's)	Weight (tonnes)	Mean weight (kg)	% harvest	Number (000's)	Weight (tonnes)	Mean weight (kg)	% harvest			
2002	50,086	272	824	3.0	0.5	22,602	96,205	4.3	45.1	15,555	71,988	4.6	31.1	76.7	169,017	3.37
2003	43,083	82	276	3.4	0.2	19,596	85,792	4.4	45.5	13,920	61,850	4.4	32.3	78.0	147,918	3.43
2004	39,041	168	319	1.9	0.4	15,075	67,738	4.5	38.6	14,237	67,537	4.7	36.5	75.5	135,594	3.47
2005	37,168	0	0	-	0	14,036	64,099	4.6	37.8	14,999	69,000	4.6	40.3	78.1	133,099	3.58
2006	41,091	115	211	1.8	0.3	13,787	60,890	4.4	33.5	15,881	73,631	4.6	38.6	72.5	134,732	3.28
2007	37,853	23	40	1.7	0.06	13,011	54,759	4.2	34.4	14,133	66,448	4.7	37.3	71.8	121,247	3.20
2008	36,662	116	216	1.9	0.3	16,338	77,621	4.7	44.6	13,666	68,070	5.0	37.3	82.2	145,907	3.98
2009	38,548	81	178	2.2	0.2	18,266	85,826	4.7	47.4	13,772	66,606	4.8	35.7	83.3	152,610	3.96
2010	38,490	128	268	2.1	0.3	18,694	91,105	4.9	48.6	13,053	64,178	4.9	33.9	82.8	155,551	4.04
2011	42,733	109	307	2.8	0.3	21,502	97,744	4.5	50.3	11,283	57,073	5.1	26.4	77.0	155,124	3.63
2012	41,094	127	301	2.4	0.3	21,264	106,161	5.0	51.7	13,712	76,305	5.6	33.4	85.4	182,767	4.45
2013	40,936	0	0	-	0	20,316	101,997	5.0	49.6	10,910	56,984	5.2	26.7	76.3	158,981	3.88
2014	48,112	286	720	2.5	0.6	24,038	114,112	4.7	50.0	10,940	51,321	4.7	22.7	73.3	166,153	3.45
2015	45,465	223	626	2.8	0.5	24,633	111,163	4.5	54.2	11,094	63,262	5.7	24.4	79.1	175,051	3.85
2016	42,957	114	333	2.9	0.3	25,596	126,445	4.9	59.6	7,165	45,224	6.3	16.7	76.6	172,002	4.00
2017	46,116	0	0	-	0	21,825	110,554	5.1	47.3	12,212	70,860	5.8	26.5	73.8	181,414	3.93
2018	45,513	84	247	2.9	0.2	26,324	132,090	5.0	57.8	8,883	49,146	5.5	19.5	77.5	181,483	3.99
2019	52,990	319	931	2.9	0.6	28,529	141,775	5.0	53.8	10,602	60,664	5.7	20.0	74.4	203,370	3.84
2020	52,492	323	1,208	3.7	0.6	29,697	144,695	4.9	56.6							
2021	51,131	16	34	2.1	0.03											

To put the scale of the mortality losses into perspective, the [Scottish Government survey for 2021](#) details 70+ million ova (eggs) laid down each year and 50+ million smolts put to sea each year:

Table 18: Source, number (000's), previous year's estimate of ova laid down to hatch during 2012-2021 and projected production for 2022

Year	In-house broodstock	Out-sourced GB broodstock	GB wild broodstock	Foreign ova	Total	Previous year's estimate
2012	18,556	9,981	0	34,700	63,237	55,723
2013	16,996	8,263	0	41,315	66,573	49,249
2014	14,418	2,725	10	53,684	70,837	48,149
2015	6,479	223	10	61,463	68,175	65,284
2016	5,884	4	0	58,458	64,346	59,604
2017	6,228	360	0	59,158	65,746	60,673
2018	8,780	200	0	61,499	70,479	67,374
2019	5,516	1,724	75	63,931	71,246	71,571
2020	5,195	4,480	258	68,685	78,618	70,598
2021	6,383	22,581	124	43,707	72,795	68,588
2022						77,306

## Smolts Produced and Put to Sea

Table 19: Actual and projected smolt production and smolts put to sea (millions) during 2012-2023

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Actual smolts put to sea	41.1	40.9	48.1	45.5	43.0	46.1	45.5	53.0	52.5	51.1		
Smolts produced	44.3	40.5	45.0	44.6	42.9	46.2	47.1	51.4	50.5	51.2		
Estimated production	31.3	28.1	39.9	43.4	36.6	39.3	46.1	38.6	52.1	55.6	54.1	55.6
Ratio of ova laid down to smolts produced	1.4	1.6	1.6	1.5	1.5	1.4	1.5	1.4	1.6	1.4		

In late September 2022, Scamon Scotland [wrote to the Scottish Parliament Rural Affairs, Islands and Natural Environment Committee](#) urging the disclosure of mortality numbers by Salmon Scotland. This followed an urgent [intervention on 6 September 2022 by Edward Mountain MSP \(former convenor of the Scottish Parliament’s Rural Affairs Committee\)](#) who raised the issue of the “alarming” increase in mortalities on salmon farms.

Yet the situation is clearly getting much worse as mortality data from Salmon Scotland is disclosed a month or so after the event ([September 2022 data](#) was published on 9 November 2022; and [August 2022 data was published in early October 2022](#)). Shamefully, [SEPA has still not published ANY mortality data since December 2021](#) (if we wait for SEPA to publish mortality data for 2022 then we’ll be waiting until late 2023!).

Inside Scottish Salmon Feedlots [reported yesterday \(10 November 2022\)](#): “In just a single month, 4.7% of the approx 65 million caged salmon on feedlots in Scotland died prematurely due to disease, parasites or mistreatment. That’s around 3 million animals.”



‘Publish or perish’ so the maxim goes. This week witnessed an unprecedented wave of financial fallout as the Q3 2022 reports for Scotland’s three largest salmon farmers ([Mowi](#), [Norskott](#)

[Havbruk/Scottish Sea Farms](#) and [Bakkafrost Scotland/The Scottish Salmon Company](#)) revealed a 30,000+ tonne black hole in 2022 salmon farming production data (companies are obliged to disclose relevant financial losses under the Norwegian Securities Trading Act).

The 30,000+ loss in production was forewarned by the Scottish Government. If you look at the [‘Scottish Fish Farm Production Survey 2021’](#) published last month (27 October 2022) you will see 205,392 tonnes of farmed salmon reported in Scotland for 2021. Yet the previous year’s survey ([‘Scottish Fish Farm Production Survey 2020’](#)) estimated 2021 production as 236,000 (the 2022 forecast of 189,693 tonnes could even be lower based upon rising mortalities).

**Table 24:** Annual production of salmon (tonnes) 2001-2021 and projected production in 2022

Year	Tonnes	Percentage difference	Year	Tonnes	Percentage difference
2001	138,519	7	2012	162,223	3
2002	144,589	4	2013	163,234	1
2003	169,736	17	2014	179,022	10
2004	158,099	-7	2015	171,722	-4
2005	129,588	-18	2016	162,817	-5
2006	131,847	2	2017	189,707	17
2007	129,930	-1	2018	156,025	-18
2008	128,606	-1	2019	203,881	31
2009	144,247	12	2020	192,129	-6
2010	154,164	7	2021	205,393	7
2011	158,018	3	2022	189,693*	

\*Industry estimate of projected tonnage based on stocks currently being on-grown.

**Table 24:** Annual production of salmon (tonnes) during 2000-2020 and projected production in 2021

Year	Tonnes	Percentage difference	Year	Tonnes	Percentage difference
2000	128,959	2	2011	158,018	2.5
2001	138,519	7	2012	162,223	2.7
2002	144,589	4	2013	163,234	0.6
2003	169,736	17	2014	179,022	9.7
2004	158,099	-7	2015	171,722	-4.1
2005	129,588	-18	2016	162,817	-5.2
2006	131,847	2	2017	189,707	16.5
2007	129,930	-1.4	2018	156,025	-17.8
2008	128,606	-1	2019	203,881	30.7
2009	144,247	12	2020	192,129	-5.8
2010	154,164	6.9	2021	236,000*	

\*Industry estimate of projected tonnage based on stocks currently being on-grown.

If you look at the mortality data [published by Salmon Scotland for September 2022](#) (remember this was data [forced out by the Scottish Parliament during the salmon farming inquiry in 2018](#)) then the increasing mortality rate becomes clear. Plot the monthly mortality data in a graph and you will see that the death rate peaks in the Autumn with October tending to be the worst month:

### September 2022

#### Notes to support the table

The industry is committed to reporting as quickly as practically possible, some one month in arrears.

"Monthly mortality (%)" = the percentage of fish lost on each farm within each month. This is reported as a percentage of the total number of fish on the farm each month. This is the measure of mortality used by the Scottish Government's Fish Health Inspectorate when assessing the health of the fish on the farm.

Further analysis shows that the overall monthly mortality for the industry was:

1.35% in Jan. 2018	1.07% in Nov. 2018	2.24% in Sept. 2019	1.59% in Jul. 2020	0.69% in May 2021	1.28% in Mar. 2022
0.94% in Feb. 2018	1.03% in Dec. 2018	2.79% in Oct. 2019	2.64% in Aug. 2020	0.70% in Jun. 2021	1.19% in Apr. 2022
1.49% in Mar. 2018	1.15% in Jan. 2019	1.76% in Nov. 2019	1.78% in Sept. 2020	1.09% in Jul. 2021	1.06% in May 2022
1.32% in Apr. 2018	1.05% in Feb. 2019	1.10% in Dec. 2019	2.07% in Oct. 2020	1.99% in Aug. 2021	1.33% in Jun. 2022
0.76% in May 2018	0.95% in Mar. 2019	1.26% in Jan. 2020	1.48% in Nov. 2020	3.46% in Sept. 2021	3.46% in Jul. 2022
0.54% in Jun. 2018	1.33% in Apr. 2019	0.95% in Feb. 2020	0.94% in Dec. 2020	3.93% in Oct. 2021	2.46% in Aug. 2022
1.05% in Jul. 2018	0.83% in May 2019	1.13% in Mar. 2020	1.17% in Jan. 2021	2.45% in Nov. 2021	4.65% in Sept. 2022
1.55% in Aug. 2018	1.06% in Jun. 2019	1.17% in Apr. 2020	1.08% in Feb. 2021	2.55% in Dec. 2021	
1.57% in Sept. 2018	1.36% in Jul. 2019	0.92% in May 2020	1.14% in Mar. 2021	1.73% in Jan. 2022	
1.49% in Oct. 2018	1.30% in Aug. 2019	0.72% in Jun. 2020	1.04% in Apr. 2021	1.05% in Feb. 2022	

Scrutinise the [September mortality data published \(9 November 2022\) by Salmon Scotland](#) and it is difficult to believe that October could be in any way worse (note that [all the companies named below except Organic Sea Harvest are certified as 'welfare friendly' by RSPCA Assured](#) and the [ASC certifies Mowi salmon farms including Stulaigh, Rum, Marulaig Bay and Harport](#) with the latter also [certified by the Soil Association as 'organic' along with Invertote](#)):



## Monthly Mortality Rate: September 2022

Company	Farm	Monthly mortality (%)	Notes	Cumulative mortality over full production cycle (%)
Loch Duart Ltd	Loch Carnan	55.9	Jellyfish / plankton	In production
Mowi Scotland Limited	Stulaigh	38.0	Jellyfish / plankton	In production
Bakkafrost Scotland	Lamlash	32.3	Gill health related	In production
Scottish Sea Farms Ltd	Nevis C	27.0	Environment, Gill health related	In production
Mowi Scotland Limited	Rum	25.2	Jellyfish / plankton	In production
Mowi Scotland Limited	Muck	23.9	Jellyfish / plankton	In production
Bakkafrost Scotland	Plocrapool	23.1	Gill health related	In production
Mowi Scotland Limited	Marulaig Bay	21.7	Jellyfish / plankton	In production
Scottish Sea Farms Ltd	Nevis B	21.6	Environment, Gill health related	In production
Bakkafrost Scotland	Strondoir Bay	19.5	Gill health related, Viral disease	In production
Bakkafrost Scotland	East Tarbert Bay	18.4	Gill health related, Environment	In production
Mowi Scotland Limited	Hellisay	13.9	Jellyfish / plankton	In production
Bakkafrost Scotland	Ardgadden	13.3	Gill health related	In production
Scottish Sea Farms Ltd	Nevis A	12.8	Environment, Gill health related	In production
Bakkafrost Scotland	Scotasay	12.7	Gill health related	In production
Scottish Sea Farms Ltd	Fada	11.2	Gill health related, Viral disease	In production
Organic Sea Harvest Ltd	Invertote	10.7	Jellyfish / plankton, Gill health related	In production
Bakkafrost Scotland	Gob a Bharra	9.8	Gill health related	In production
Mowi Scotland Limited	Harport	9.7	Jellyfish / plankton	In production

Tavish Scott (chief lobbyist for the Norwegian-owned salmon farming industry in Scotland which [controls ca. 80% of 'Scottish' salmon farming production](#)) has a job which makes him blind, deaf and dumb to mortality and disease problems even though he is up to his neck in a [stinky cess-pit of morts](#).



Back in December 2020, [when Joe Crowley of BBC Countryfile showed the Scottish Government's data to him – revealing 26% mortality – Tavish Scott claimed that he did not recognize the figures.](#)



**Don Staniford**  
@TheGAAIA · Follow



"I don't recognise your figure (26% mortality)" says [@tavishscott](#) to [@joe\\_crowley](#) [@BBCCountryfile](#) [tinyurl.com/yxqeb6yu](https://tinyurl.com/yxqeb6yu)

Even Mr Magoo would recognise the fact that over a quarter of all Scottish salmon are dying in just the sea-phase of production! [@marinescotland](#) [@SSPOsays](#)



10:09 AM · Dec 7, 2020



In April 2021, [when BBC Scotland's 'The Nine' asked Tavish Scott to respond to a claim in Netflix's 'Seaspiracy' that millions of farmed salmon were dying due to infectious diseases \(again sourced from Scottish Government mortality data\) the former Member of the Scottish Parliament once again denied the truth.](#)



**Salmon Scotland**  
@SalmonScotland · Follow

MILLIONS of farmed salmon are dying from lice infestations, chlamydia, heart disease, anaemia etc.

The CEO of the Scottish Salmon Producers Organisation @SSPOsays, Mr @TavishScott says it's a "Pack of lies".

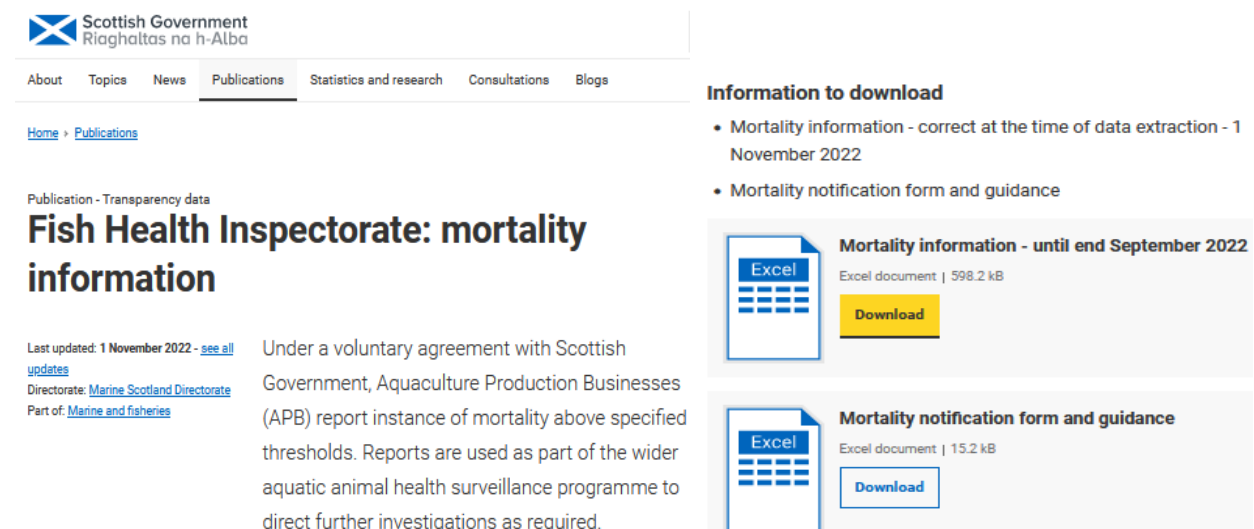
Make up you own mind who's the LIAR here.

Watch on Twitter

mortality Ben, a skip of dead fish and it is not

11:19 AM · Apr 19, 2021

Any skeptics can read the latest mortality data [published by the Scottish Government on 1 November 2022](#) which detail millions and millions of morts reported (note that not all morts are reported – ‘Mortality Event Reports’ are only triggered if mortality exceeds 1% and no morts are reported in the six weeks after smolts are put into sea cages; and [some companies have been lax at reporting full figures](#)).



Scottish Government  
Riaghaltas na h-Alba

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## Fish Health Inspectorate: mortality information

Last updated: 1 November 2022 - [see all updates](#)  
Directorate: [Marine Scotland Directorate](#)  
Part of: [Marine and fisheries](#)

Under a voluntary agreement with Scottish Government, Aquaculture Production Businesses (APB) report instance of mortality above specified thresholds. Reports are used as part of the wider aquatic animal health surveillance programme to direct further investigations as required.

### Information to download

- Mortality information - correct at the time of data extraction - 1 November 2022
- Mortality notification form and guidance

**Mortality information - until end September 2022**  
Excel document | 598.2 kB  
Download

**Mortality notification form and guidance**  
Excel document | 15.2 kB  
Download

When Scamon Scotland [analysed the Scottish Government’s mortality data in mid-September 2022](#) we found that nearly 5 million morts (4,917,891 to be precise) had been reported in 2022 (data up to the end of July/early August).

### **Reported Annual Mass Mortalities Increasing:**

2022\*: 4,917,891 (264 ‘Mortality Event Reports’)  
2021: 9,091,344 (728 ‘Mortality Event Reports’)  
2020: 5,155,524 (531 ‘Mortality Event Reports’)  
2019: 6,389,555 (573 ‘Mortality Event Reports’)  
2018: 3,794,605 (347 ‘Mortality Event Reports’)  
2017: 4,843,824 (386 ‘Mortality Event Reports’)  
2016: 1,065,134 (83 ‘Mortality Event Reports’)  
2015: 8,118 (7 ‘Mortality Event Reports’)

\* data up to end of July/early August

However, fast-forward a few months and the [data disclosed by the Scottish Government on 1 November 2022](#) (data up to end of September/early October 2022) reveals staggering increases in mortalities with a total of 10.6 million (10,641,901 to be precise) morts reported thus far during 2022 (i.e. 5.6 million more morts since July!).

To break that down here’s the monthly morts reported since 2022:

**September 2022: 3,788,442 morts**

**August 2022: 1,234,736 morts**

**July 2022: 514,315 morts**

**June 2022: 475,715 morts**

[Note that the Scottish Government data includes mortalities reported for freshwater – although mortality data for freshwater hatcheries and smolt farms in freshwater lochs is not reported by the industry: another black hole in data collection]

Suffice to say that Scamon Scotland urges the government authorities; certification bodies responsible for [greenwashing Scottish salmon](#); [supermarkets who fraudulently market Scottish salmon as “responsibly sourced”](#); and animal welfare groups who turn a blind eye to abuse inside salmon farms to close the net on the mortality, disease and [welfare nightmare of Scottish salmon](#).

Earlier this week (8 November 2022), a [damning report by the Animal Law Foundation and Animal Equality lifted the lid on welfare abuse inside factory farms](#). The report – ‘The

[Enforcement Problem: the case for stronger enforcement of farmed animal protection laws in the UK](#) - included:

## Fish farms

The welfare breaches detected during investigations involving fish farming include lice infestations, open wounds, infections, missing eyes, deformities and lesions. On one farm, fish had been caught in netting over ponds used to keep predators out and were left to die and rot. In another incident live fish were thrown and kicked on the floor. During fish cleaning operations, fish were pumped through pipes with insufficient water flow causing abrasions and wounds and some were filmed pressed up against the outlet grilles, gasping for breath. Complaints were made; however, no formal action was taken in relation to any of these incidents.

The biggest fish farming industry in the UK is salmon farming in Scotland, with roughly 300 fish farms<sup>28</sup> housing at least 35 million fish in 2016.<sup>29</sup> In May 2020, APHA, the body that inspects fish farms in Scotland informed fish farm investigator Don Staniford that it had only visited 35 salmon farms between 2013 to April 2020, with only one salmon farm visited in the years 2014 and 2015.<sup>30</sup>

<sup>30</sup> <https://donstaniford.typepad.com/my-blog/2021/04/whitewashing-welfare-abuse-of-scottish-salmon-as-sponsored-via-rspca-sspca-apha.html>

In April 2021, Scottish Salmon Watch (renamed \$camon \$cotland in February 2022) [wrote to the Secretary of State for Environment, Food and Rural Affairs](#):



George Eustice  
Secretary of State for Environment, Food and Rural Affairs  
Department for Environment, Food & Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF

20 April 2021

Dear Secretary of State,

### **Systemic Failures to Capture Evidence of Welfare Abuse on Scottish Salmon Farms**

Scottish Salmon Watch is writing to you with respect to the Animal & Plant Health Agency (APHA) and their failure to inspect salmon farms in Scotland. In summary, Scottish Salmon Watch would like to raise complaints in relation to the following three issues:

- 1) **The lack of quantity of salmon farm inspections**
- 2) **The lack of quality of salmon farm inspections**
- 3) **APHA's failure to disclose information on salmon farm inspections via FOI**

Recent video footage and a report [published by Compassion in World Farming and OneKind](#) adds weight to [damning evidence of widespread welfare abuse](#) on salmon farms in Scotland which is being willfully ignored by APHA 'inspectors'.

Scottish Salmon Watch's [letter in April 2021](#) included:

Scottish Salmon Watch is particularly concerned at the following failures by APHA (which as an executive agency of DEFRA comes within your jurisdiction):

### 1) The lack of quantity of salmon farm inspections

In May 2020, APHA revealed via a Freedom of Information request that only 35 salmon farms had been 'inspected' since 2013 (if five salmon farms were 'inspected' after May 2020 then that brings the total figure up to 40).

The number of Salmon farm visits attended by APHA from 2013 up to April 2020 is thirty five

2013 – 13 visits  
2014 – 1 visit  
2015 – 1 visit  
2016 – 2 visits  
2017 – 2 visits  
2018 – 3 visits  
2019 - 13 visits  
2020 – none to date.

In view of the fact (as [sourced from the latest Scottish Government data published in October 2020](#)) there are 76 freshwater salmon farms and 226 sea cage salmon farms (that's 302 salmon farms in Scotland in total) one might question the efficacy of APHA's inspection regime. You might be better at Maths than my Grade 'C' O'Level but if five salmon farms are inspected this year and next (bringing the total number up to 50) then only one in six (17%) salmon farms will have been 'inspected' in a decade'!

By contrast, [Compassion in World Farming](#) "investigated 22 farms between September and November 2020, using both drone technology and, at 6 farms, underwater divers". The appalling findings were documented on farms owned by all five of Scotland's largest salmon producers (Cooke Aquaculture, Grieg Seafood, Mowi, Scottish Sea Farms and The Scottish Salmon Company), which together account for over 96% of the industry.





Don Staniford  
@TheGAAIA



Compassion in World Farming investigated 22 salmon farms in four months between September & December 2020 using cameras, drones & divers. APHA 'inspected' 22 salmon farms in six years (2014 to 2019)! How many did @rspcaassured inspect? [tinyurl.com/ufm6jbbf](https://tinyurl.com/ufm6jbbf) @media\_ciwf



Compassion in World Farming and 7 others

2:18 PM · Apr 20, 2021 · Twitter Web App

You only have to look at [photos published by the Scottish Government](#) (shocking images which [lawyers representing salmon farming companies attempted to suppress](#) – thankfully [unsuccessfully as it is turned out](#)) to see the scale of welfare abuse on Scottish salmon farms:



Don Staniford  
@TheGAAIA



Edie Bowles @Animallawyersuk said the dossier, compiled by Don Staniford, a critic of salmon farming, indicated “systemic and obvious” pain & suffering that could justify legal action against @scotgov @MairiGougeon @SSPOsays [tinyurl.com/yxy775wp](https://tinyurl.com/yxy775wp) @SundayTimesScot @ciwf @scotgp



9:54 AM · Feb 2, 2020 · Twitter Web App

Secret filming by \$camon Scotland in July 2022 [inside RSPCA Assured Norskott Havbruk \(Scottish Sea Farms\) in the Sound of Mull and Loch Creran](#) exposed the [criminal nature](#) of 'responsible' salmon farming.

 Don Staniford  
@TheGAAIA

Video Exclusive: Secret Filming Exposes Horrific Welfare Abuse Inside RSPCA Assured Scottish Salmon Farms! [tinyurl.com/3krdb2z2](https://tinyurl.com/3krdb2z2) @rspcaassured @scotseafarms @marksandspencer @ScottishSPCA @APHAgovuk @ProfCMDwyer @LynneUSneddon @ciwf @Animallawyersuk @vivacampaigns @Ecohustler



Scottish Greens and 9 others

6:32 AM · Jul 11, 2022 · Twitter Web App

 Salmon Farming is Criminal - breaches of welfare ...  Copy link

*"A person commits an **offence** if the person does **not** take steps to ensure that the needs of an animal, under their care, are met"*

**COMMITTS  FFENCE**

Animal Health and Welfare (Scotland) Act 2006 Section 24

Watch on  YouTube

The proof of the pudding lies in the [mortality data](#) and here the salmon farming cannot hide from the fact that death rates are wholly unacceptable and a [world removed from 'responsible'](#). Data

[published by Scamon Scotland in September 2022](#) illustrates the depth of the problem with even smaller companies like Loch Duart and Wester Ross hit with horrific mortalities:

**Summary Data:**

**The Worst Salmon Farms In Scotland Since 2018**  
 (as judged by cumulative mortality rates [published by Salmon Scotland](#)!)



- 82.1%: Druimyeon Bay (Bakkafrost Scotland/Scottish Salmon Company) – December 2021
- 80.2%: East Tarbert Bay (Bakkafrost Scotland/Scottish Salmon Company) – January 2022
- 78.3%: Leinish (Grieg Seafood) – September 2020
- 66.2%: Vacasay (Bakkafrost Scotland/Scottish Salmon Company) – December 2021
- 65.7%: Ardessie A (Wester Ross Fisheries) – February 2019
- 59.5%: Greshornish (Mowi) – July 2022
- 58.2%: Inch Kenneth (Bakkafrost Scotland/Scottish Salmon Company) – February 2018
- 57.7%: Kyles Vuia (Bakkafrost Scotland/Scottish Salmon Company) – July 2022
- 56.2%: Plocrapool (Bakkafrost Scotland/Scottish Salmon Company) – February 2021
- 55.9%: Greanem (Mowi) – June 2022
- 52.9%: Maaey (Bakkafrost Scotland/Scottish Salmon Company) – December 2019
- 51.3%: Corlarach (Grieg Seafood) – September 2020
- 50.5%: Ardessie B (Wester Ross Fisheries) – April 2019
- 50.3%: Sound of Harris (Loch Duart) – December 2021
- 50%: Camas Glas (Mowi) - July 2022

**SCOTTISH SALMON'S 50%+ MORTALITY CLUB!**



**Worst Mortality Rates by Company Over the Last Twelve Months\***

– Bakkafrost Scotland is the King of Death!



- The Scottish Salmon Company/Bakkafrost Scotland: 39.8%
- Wester Ross Fisheries: 34.4%
- Loch Duart: 22%
- Mowi Scotland: 18.9%
- Scottish Sea Farms: 18.3%
- Grieg Seafood: 10.7%
- Cooke Aquaculture: 9.9%
- Industry Average: 19.9%
- Industry Average in 2022 (January to July): 22%
- Industry Average in 2021 (August to December): 17.8%

No company or site – even those greenwashed by the ASC, RSPCA Assured and Soil Association – are immune from mass deaths:

**Bakkafrost: Scottish Salmon's King of Death**  
 – 31 sites with cumulative mortality at 30% or higher since 2018!



- 82.1%: Druimyeon Bay (Bakkafrost Scotland/Scottish Salmon Company) – December 2021
- 80.2%: East Tarbert Bay (Bakkafrost Scotland/Scottish Salmon Company) – January 2022
- 66.2%: Vacasay (Bakkafrost Scotland/Scottish Salmon Company) – December 2021
- 58.2%: Inch Kenneth (Bakkafrost Scotland/Scottish Salmon Company) – February 2018
- 57.7%: Kyles Vuia (Bakkafrost Scotland/Scottish Salmon Company) – July 2022
- 56.2%: Plocrapool (Bakkafrost Scotland/Scottish Salmon Company) – February 2021
- 52.9%: Maacey (Bakkafrost Scotland/Scottish Salmon Company) – December 2019
- 47.6%: Gravir Outer (Bakkafrost Scotland/Scottish Salmon Company) – March 2018
- 45.4%: Reibinish (Bakkafrost Scotland/Scottish Salmon Company) – May 2021
- 42.3%: Gravir Outer (Bakkafrost Scotland/Scottish Salmon Company) – April 2022
- 41.5%: Strone (Bakkafrost Scotland/Scottish Salmon Company) – September 2020
- 39.8%: Vacasay (Bakkafrost Scotland/Scottish Salmon Company) – October 2018
- 39.4%: Taranaish (Bakkafrost Scotland/Scottish Salmon Company) – October 2018
- 39.4%: Sgian Dubh (Bakkafrost Scotland/Scottish Salmon Company) – September 2020
- 39.1%: West Strome (Bakkafrost Scotland/Scottish Salmon Company) – February 2022
- 38.9%: Grimsay (Bakkafrost Scotland/Scottish Salmon Company) – March 2020
- 36.8%: Eport Outer (Bakkafrost Scotland/Scottish Salmon Company) – December 2021
- 36.3%: Kyles Vuia (Bakkafrost Scotland/Scottish Salmon Company) – July 2020
- 34.6%: Strone (Bakkafrost Scotland/Scottish Salmon Company) – September 2018
- 33.6%: Glenan Bay (Bakkafrost Scotland/Scottish Salmon Company) – June 2021
- 34.2%: Eughlam (Bakkafrost Scotland/Scottish Salmon Company) – October 2018
- 33.5%: Taranaish (Bakkafrost Scotland/Scottish Salmon Company) – October 2020
- 33.3%: Vuia Mor (Bakkafrost Scotland/Scottish Salmon Company) – August 2018
- 32.7%: Grimsay (Bakkafrost Scotland/Scottish Salmon Company) – August 2019
- 32.6%: Vacasay (Bakkafrost Scotland/Scottish Salmon Company) – October 2020
- 32.6%: Treanay (Bakkafrost Scotland/Scottish Salmon Company) – February 2019
- 32%: Treanay (Bakkafrost Scotland/Scottish Salmon Company) – July 2018
- 32%: Sgeir Dughall (Bakkafrost Scotland/Scottish Salmon Company) – July 2021
- 31%: Vuia Beag (Bakkafrost Scotland/Scottish Salmon Company) – October 2018
- 30.6%: Portree (Bakkafrost Scotland/Scottish Salmon Company) – June 2022
- 30%: Maaev (Bakkafrost Scotland/Scottish Salmon Company) – October 2021

**Welfare Abuse at RSPCA Assured Wester Ross (now owned by Mowi)!**



- 65.7%: Ardessie A (Wester Ross Fisheries) – February 2019
- 50.5%: Ardessie B (Wester Ross Fisheries) – April 2019
- 34.6%: Ardessie B (Wester Ross Fisheries) – May 2022
- 34.1%: Ardessie A (Wester Ross Fisheries) – April 2022

Lousy RSPCA Assured Loch Duart – the Not Sustainable Salmon Company (as corrected by the Advertising Standards Authority)!



- 50.3%: Sound of Harris (Loch Duart) – December 2021
- 41.2%: Calbha Bay (Loch Duart) – May 2020
- 40.6%: Loch Laxford (Loch Duart) – July 2019
- 39.6%: Calbha Bay (Loch Duart) – April 2018
- 37.1%: Loch a Chairn Bhain (Loch Duart) – January 2019
- 36.1%: Lochmaddy (Loch Duart) – October 2020
- 28%: Loch Carnan (Loch Duart) – January 2018
- 27.6%: Lochmaddy (Loch Duart) – January 2019
- 25.6%: Loch Laxford (Loch Duart) – July 2021

Mowi's Mortality Nightmare: sponsored via RSPCA Assured, the ASC, Tesco, Sainsburys, Lidl & Aldi as "responsibly sourced" & "farmed responsibly"!

- 36 RSPCA Assured salmon farms with 25%+ mortality rates since 2018



- 59.5%: Greshornish (Mowi) – July 2022
- 55.9%: Greanem/Grey Horse Outer\* (Mowi) – June 2022
- 50%: Camas Glas\* (Mowi) - July 2022
- 44.2%: Grey Horse Channel\* (Mowi) – July 2022
- 40.7%: Bagh Dail Nan Cean (Mowi) – October 2019
- 39.2%: Loch Alsh\* (Mowi) – August 2018
- 39%: Muck\*\* (Mowi) – February 2020
- 38.4%: Greshornish (Mowi) – August 2018
- 36.8%: Stulaigh\* (Mowi) – September 2020
- 35.3%: North Shore (Mowi) – March 2018
- 35.2%: North Shore (Mowi) – February 2020
- 35.2%: North Shore East (Mowi) – February 2020
- 34.8%: Isle Ewe\* (Mowi) – November 2018
- 34.6%: Macleans Nose\* (Mowi) – August 2018
- 32.9%: Ardnish\* (Mowi) – June 2022
- 31.6%: Carradale North\*\* (Mowi) – October 2020
- 31.5%: Tabhaigh (Mowi) – November 2019
- 31.4%: Caolas a Deas East\* (Mowi) – October 2020
- 31.3%: North Shore East (Mowi) – March 2018

RSPCA Assured Scottish Sea Farms (Norskott Havbruk) – as sold exclusively by Marks & Spencer & being certified as “farmed responsibly” via the ASC!



- 41.3%: Kishorn B North (Scottish Sea Farms) – October 2021
- 41.2%: Lismore North (Scottish Sea Farms) – June 2019
- 41.1%: Loura Voe (Scottish Sea Farms) – August 2019
- 40.9%: Nevis C\* (Scottish Sea Farms) – September 2019
- 40.6%: Spelve B (Scottish Sea Farms) – October 2019
- 38.9%: Foraness (Scottish Sea Farms) – June 2022
- 36.6%: Lismore East/Walters (Scottish Sea Farms) – November 2020
- 34.6%: Loch Creran B (Scottish Sea Farms) – May 2021
- 32.8%: Spelve B (Scottish Sea Farms) – October 2021
- 32.1%: Toyness\* (Scottish Sea Farms) – May 2021
- 31.8%: Kishorn B North (Scottish Sea Farms) – October 2019
- 31.8%: Holms Geo (Scottish Sea Farms) – September 2019
- 27.7%: Teisti Geo (Scottish Sea Farms) – October 2019
- 27.2%: Mangaster (Scottish Sea Farms) – May 2020
- 26.7%: Nevis C\* (Scottish Sea Farms) – February 2018

Cooke Aquaculture – certified as ‘organic’ by the Soil Association & “responsibly sourced” via RSPCA Assured!



- 48.8%: Bay of Vady (Cooke Aquaculture) – September 2018
- 37.8%: Djubawick (Cooke Aquaculture) – September 2018
- 34.3%: Burkwell (Cooke Aquaculture) – May 2018
- 32.5%: Winna Ness (Cooke Aquaculture) – March 2018
- 31.1%: Djubawick (Cooke Aquaculture) – November 2019
- 27.2%: Fara West (Cooke Aquaculture) – April 2019
- 26.7%: Djubawick (Cooke Aquaculture) – January 2018
- 26.2%: Kirkabister (Cooke Aquaculture) – September 2018
- 25.7%: Bow of Hascosay (Cooke Aquaculture) – August 2018
- 25.7%: Burkwell (Cooke Aquaculture) – June 2019

Grieg Seafood's RSPCA Assured Gruesomeness (owned by Norskott Havbruk/Scottish Sea Farms since late 2021)!



- 78.3%: Leinish (Grieg Seafood) – September 2020
- 51.3%: Corlarach (Grieg Seafood) – September 2020
- 40.7%: North Voe (Grieg Seafood) – February 2018
- 40.1%: Cole Deep (Grieg Seafood) – January 2020
- 37.2%: Langa (Grieg Seafood) – September 2019
- 35.8%: West of Burwick (Grieg Seafood) – September 2019
- 35.3%: North Papa (Grieg Seafood) – August 2019
- 34.5%: North Voe (Grieg Seafood) – November 2020
- 29.5%: Score Holms (Grieg Seafood) – July 2019
- 28.7%: Swining 3 (Grieg Seafood) – September 2020
- 25.8%: Snizort East (Grieg Seafood) – December 2020

If we wait until mortality data is published for October 2022 and beyond then it will be too late to save tens of millions of Atlantic salmon suffering unnecessarily inside cages in Scotland. Immediate action needs to be taken now – please intervene as a matter of urgency.

Back in July 2018, Scottish Salmon Watch [warned the Animal & Plant Health Agency and Police Scotland's Wildlife Crime Unit that the Animal Health and Welfare \(Scotland\) Act 2006 was being systematically breached by salmon farms across Scotland](#). Yet over four years later the problems are significantly worse. The industry-wide scale of mass mortalities – and undercover evidence of abuse - warrants urgent site inspections of all salmon farms by welfare agencies.



In the meantime, \$camon \$cotland has [called for the immediate suspension of certification and accreditation of ‘responsibly sourced’ Scottish salmon via RSPCA Assured and the ASC](#) (as well as [Label Rouge](#) and the [Soil Association](#)). The shameless greenwashing of Scottish salmon must be stopped dead in its tracks.



Continued government inaction by APHA– including their woeful [lack of enforcement of welfare laws](#) - is both unacceptable and unlawful. Similarly, amidst a rising tide of dead salmon, Scottish Ministers are [ignoring their statutory duties under animal welfare laws](#).



It remains to be seen whether the Scottish Veterinary Service – which is [scheduled to replace APHA in Scotland](#) – will clamp down on endemic suffering and welfare abuse inside salmon farms. In the absence of APHA enforcement and inspection, Scamon Scotland urges the [Scottish Animal Welfare Commission](#) (welfare issues on salmon farms were identified in a work plan [published in July 2022](#)) and the [Scottish Parliament Rural Affairs, Islands and Natural Environment Committee](#) to scrutinize the alarming mortality rates on salmon farms.

Consumers can take action too by [joining the global boycott against farmed salmon](#) and supporting WildFish's 'Off the Table' [campaign](#).

Further information on the gruesome nature of salmon farming in Scotland can be found via:  
[3 million Scottish Salmon Die Inside RSPCA Assured Feedlots in September?!](#)  
[8,000 tonne shortfall for Scottish Sea Farms \(Norskott Havbruk\) due to "biological challenges"!](#)  
[Record Death Rates Plagues Salmon Farms Across Scotland!](#)  
[Bakkafrost's Scottish Salmon Nightmare Gets Worse with 10,000 Tonne Black Hole in Scotland!](#)  
[Annus Horribilis Salmonis: Mowi's "Troublesome Year" in Scotland - 22% fall in production!](#)  
[Death Stalks Scottish Salmon - Rising Mortalities Plague RSPCA Assured & ASC-Certified Sites!](#)  
[Abominable Salmon Certification - the Aquaculture Stewardship Council is Sponsoring Serial Killing in Scotland!](#)  
[Scottish Scamon: Piscine Reovirus, skin lesions/boils & "hanging" salmon in Loch Creran \(sold by M&S as "responsibly sourced" & certified via RSPCA Assured\)!](#)  
[RSPCA Assured Scottish Salmon Infested with 50 Lice, Poxvirus, Necrosis, Lesions & Myocarditis!](#)  
[Salmon Hell on 'God's Island' - Mass Mortalities Pile Up \(Again\) at RSPCA Assured Bakkafrost off Isle of Gigha!](#)  
[Greenwashing by the ASC - you can't polish a turd but you can roll it in glitter!](#)  
[New Survey Lifts Lid on Falling Production & Rising Mortalities on 'Scottish' Salmon Farms!](#)  
[Death Deflation: 13 Million Morts On Scottish Salmon Farms in 2021 - More Like 22 Million \(& maybe 50 million if you add freshwater\)!](#)  
[Named & Shamed: The Most Deadly Salmon Farms in Scotland \(as greenwashed as "responsible" via RSPCA Assured & the ASC\)!](#)  
[Halloween Comes Early at Deadly Scottish Salmon - mortalities pile up due to viral disease, fungus, gill infections & lice infestations!](#)  
[Death Rates Soar at Salmon Farms \(according to data published by Salmon Scotland\)](#)  
[Photos Expose Ongoing Welfare Abuse at RSPCA Assured Salmon Farms!](#)  
[Year of the Dead Salmon: Scottish Salmon Plagued by Mass Mortality Problems](#)  
[Media Backgrounder: Year of the Dead Salmon - Bakkafrost Scotland is the King of Death!](#)

For regular updates please read [my Green Around the Gills blog](#) and [Scottish Scamon website](#).

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