

EIR 202600503585 - ANNEX A

On reviewing materials within scope of your request, a small amount of information has been redacted under Regulation 10(4)(e) (Internal Communications). This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is some public interest in releasing the information as part of an open, transparent and accountable government. However, this is outweighed by the greater public interest in allowing Scottish Government officials a private space to share free and frank views for the purpose of deliberation of any given policy.

A small amount of information has been withheld from the document under Regulation 11(2) (Personal Data) as it contains personal information and disclosing it would contravene the data protection principles in Article 5(1) of the General Data Protection Regulations (GDPR) and in Section 34(1) of the Data Protection Act 2018. This exception is not subject to the 'public interest test'.

EIR 202600503585 - ANNEX B

From: Ian Muirhead [REDACTED: Reg 11(2)]@gov.scot>
Sent: 05 January 2026 18:45
To: [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 10(4)(e)]@gov.scot
Cc: [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)]@gov.scot>
Subject: RE: PQ S6W-42673 Ariane Burgess (salmon farming mortality reporting)

Content.

Ian Muirhead

Special Adviser to the First Minister
Rural Affairs, Land Reform & Islands.
[REDACTED: Reg 11(2)]
[REDACTED: Reg 11(2)]@gov.scot

From: [REDACTED: Reg 11(2)]@gov.scot>
Sent: 05 January 2026 14:39
To: Ian Muirhead [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 10(4)(e)]@gov.scot>
Cc: [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)]@gov.scot>
Subject: RE: PQ S6W-42673 Ariane Burgess (salmon farming mortality reporting)

Ian,

on reflection with [REDACTED: Reg 11(2)], we've made an amendment to the previous draft response (highlighted in blue for you). Grateful if you can use this as the version for comment/clearance.

[REDACTED: Reg 11(2)]

S6W-42673 Ariane Burgess: To ask the Scottish Government, further to its response to the Rural Affairs and Islands Committee 1st Report 2025, Follow-up inquiry into salmon farming in Scotland (SP Paper 720), what specific "burden" it considers would arise from implementing the recommendation that all fish mortality data be made public; which Scottish Government directorate, agency or public body would bear that burden; what additional tasks or functions would be required to implement the recommendation; what assessment has been made of the associated costs, resource implications or operational impacts, and what analysis or evidence was used to reach the conclusion that publication of this data would constitute a "burden".

Suggested Response

All mortality data collected by the Scottish Government and the Scottish Environment Protection Agency in relation to Scottish salmon farming is already made public on Scottish Government and Scotland's Aquaculture websites, resulting in a high level of transparency and more data being available for salmon farming in Scotland in comparison to other farming sectors.

A formal assessment of impacts of data collection has not been undertaken. However, additional data is not required for regulation and its provision would generate data collection, handling 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.

BG note

- Ariane Burgess (Scottish Green Party) is a strong advocate of tighter regulation of Scotland's salmon sector, including support for a moratorium. A news release by the Scottish Green Party was reported in the National and the Herald at the end of December, urging Scottish Government to pause licensing of new or expanding sites following a large scale escape incident and reports of mistreatment of farmed salmon.
- This PQ refers to the Scottish Government's response to the Rural Affairs and Islands Committee report on its inquiry into salmon farming in Scotland, in which made the following recommendation:

'The Committee recommends the Scottish Government must publish comprehensive, consistent and transparent mortality figures that include the number of fish at a farm, the freshwater mortality and seawater mortality, per facility, with accurate numbers of dead salmon, wrasse and lumpsuckers per week and with cumulative mortality totals at the end of each cycle'

- The Scottish Government response is as follows:

'More data are collected and published with respect to salmon farming in Scotland than salmon farming in other jurisdictions and in comparison to terrestrial farming sectors. Further data collections would represent significant burden for producers and regulators; we do not believe this burden would be balanced by a sufficiently high benefit given there is already so much data available, neither do we believe it is necessary to mandate any further collections through legislation given there is no evidence of non-compliance. Data already available are sufficient for transparency and regulatory purposes. Ministers are committed to supporting the New Deal for Business, which requires such justifications for additional business burdens'

[REDACTED: Reg 11(2)]

(Working days Monday, Wednesday, Thursday)

Delivery Lead - Aquaculture fish health and welfare
Marine Directorate – Marine Economy and Communities Portfolio
Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

e: **[REDACTED: Reg 11(2)]**@gov.scot

w: <http://www.scotland.gov.uk/marinescotland>

From: <[REDACTED: Reg 11(2)]@gov.scot>
Sent: 05 January 2026 13:39
To: <[REDACTED: Reg 11(2)]@gov.scot>; <[REDACTED: Reg 11(2)]@gov.scot>; <[REDACTED: Reg 11(2)]@gov.scot>
Subject: RE: PQ for comment

Also fine from me – one typo in green and yellow highlight.

[REDACTED: Reg 10(4)(e)]

[REDACTED: Reg 10(4)(e)]

[REDACTED: Reg 10(4)(e)]

Thanks,
[REDACTED: Reg 11(2)]

From: [REDACTED: Reg 11(2)]
Sent: 05 January 2026 13:13
To: [REDACTED: Reg 11(2)] ; [REDACTED: Reg 11(2)] ; [REDACTED: Reg 11(2)]
Subject: RE: PQ for comment

Thanks

Fine for me – I changed a typo or two (in red)

Kind Regards,
[REDACTED: Reg 11(2)]

[REDACTED: Reg 11(2)]
Farmed Fish Health & Innovation, Marine Directorate
Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

E: [REDACTED: Reg 11(2)]@gov.scot

From: [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>
Sent: 05 January 2026 13:07
To: [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>
Subject: RE: PQ for comment

Thanks [REDACTED: Reg 11(2)] and [REDACTED: Reg 11(2)] for comments.
[REDACTED: Reg 10(4)(e)]

Apologies [REDACTED: Reg 11(2)] – I did think you were working today, so copying you in now.

All content with the below?

[REDACTED: Reg 11(2)]

From: [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>

Sent: 05 January 2026 12:16

To: [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>; [REDACTED: Reg 11(2)] <[REDACTED: Reg 11(2)]@gov.scot>

Subject: PQ for comment

Comments on PQ response appreciated. Deadline is today, so hoping to send for clearance before 13.00. Background is in the background note which follows.

[REDACTED: Reg 11(2)]

S6W-42673 Ariane Burgess: To ask the Scottish Government, further to its response to the Rural Affairs and Islands Committee 1st Report 2025, Follow-up inquiry into salmon farming in Scotland (SP Paper 720), what specific "burden" it considers would arise from implementing the recommendation that all fish mortality data be made public; which Scottish Government directorate, agency or public body would bear that burden; what additional tasks or functions would be required to implement the recommendation; what assessment has been made of the associated costs, resource implications or operational impacts, and what analysis or evidence was used to reach the conclusion that publication of this data would constitute a "burden".

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[REDACTED: Reg 11(2)]

Delivery Lead - Aquaculture fish health and welfare
Marine Directorate – Marine Economy and Communities Portfolio
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e: **[REDACTED: Reg 11(2)]**@gov.scot

w: <http://www.scotland.gov.uk/marinescotland>