



Agenda item 5.2(c)
For information

Council

CNL(03)30

***Response from ISFA to the Report of the Standing Committee on the
Precautionary Approach, CNL(03)17***



INTERNATIONAL SALMON FARMERS' ASSOCIATION

*Australia, Canada, Chile, Faroe Islands, Iceland, Ireland,
Norway, United Kingdom, United States of America*

May 9, 2003

Malcolm Windsor, Secretary NASCO
11 Rutland Square
Edinburgh, Scotland UK
EH1 2AS

Dear Dr. Windsor:

The International Salmon Farmers Association (ISFA) submits the following response to the document SCPA(03)13, which was distributed to the Liaison Group at the end of the March 2003 meeting in Williamsburg, VA. It was agreed by the Liaison Group that ISFA would review the document at its May 2003 meeting in Brussels and provide a written response to NASCO before the June meeting in Edinburgh.

ISFA has reviewed the SCPA(03)13 document as well as the SCPA(02)19 Draft Terms of Reference for Application of the Precautionary Approach to Introductions and Transfers, Aquaculture and Transgenics in which the SCPA is asked to review NASCO agreements and measures and advise on their consistency with the Precautionary Approach (PA) and make recommendations for additional measures, taking account of appropriate risk assessments.

The International Salmon Farmers Association (ISFA) considers the resolution SCPA(03)13 to go beyond the committee's mandate to "advise on the documents' consistency with the Precautionary Approach" by creating the new resolution SCPA(03)13. ISFA requests that NASCO refer the new Standing Committee document, SCPA(03)13 to the Liaison Group for full consideration at its 2004 meeting. We make this request for the following reasons:

- We question why, at a time when wild salmon are facing problems associated with river degradation, dams, enhancement, ocean changes, global warming and significant by-catch of salmon in international waters, that NASCO would focus on salmon farming. This is especially concerning, given that the industry members of the Liaison Group were not given the opportunity to participate in the work of the SCPA when it prepared the SCPA(03)13 document;
- The opening preamble does not recognize the significant and positive work of the NASCO-ISFA Liaison Committee or the group's Guiding Principles;

- The document encompasses a broad range of issues and makes recommendations that will have a significant impact on the viability of the salmon farming industry, enhancement programs and salmon conservation projects and should be carefully reviewed by all relevant stakeholders;
- The Annexes to the document have not gone through a consultation process with the salmon farming industry and should be brought to the Liaison Group before they are incorporated into a new document;
- The documents need to be reviewed to look for consistencies with national and international policies already in place such as the Canadian Introductions and Transfers Code, the OIE classification system, Environmental Monitoring Programs and Fish Health Surveillance Programs;
- Where national requirements differ from those suggested by NASCO, national requirements should have precedence and should be referenced by NASCO. This would eliminate the need for NASCO documents such as the Protocols on Introductions and Transfers in the North American Commission. Consequently we cannot support the inclusion of Article 8 and its reference to Annex 6;
- Article 5 calls for Parties to "minimize the risk of transmission to wild salmon stocks of diseases and parasites from all aquaculture activities and from introductions and transfers" but does not recognize the need to minimize the risk of transmission of diseases and parasites from wild salmon stocks to all aquaculture activities;
- Article 7 implies incorrectly that transgenic salmon are in commercial use by the aquaculture industry. It should recognize the strong and definitive position of ISFA on this issue.
- ISFA fully concurs with the mitigative measures section and suggests it be extended to river enhancement, recreational practices, dams, coal fired electrical generation, commercial fishing and by-catch on the high seas.

By referring the SCPA(03)13 resolution to the Liaison Group's 2004 meeting as a full agenda item, ISFA is confident that these issues will be addressed and given the necessary thoughtful consideration they require.

We appreciate the opportunity to participate in NASCO discussions and the decision-making process on issues that impact our industry through the NASCO / ISFA Liaison Group and trust you will continue to make use of this valuable mechanism for recognizing the importance of conserving and enhancing wild salmon stocks and of supporting a sustainable salmon farming industry.

Yours truly,



Vigfus Johannsson
Chairman – ISFA

cc: James Ryan, Chairman – Liaison Group