Agenda item 6.4(b)
For decision

Council

CNL(05)30

Comments from the International Salmon Farmers' Association (ISFA) on the Williamsburg Resolution

At the Liaison Group meeting held in Leuven, Belgium, on 26 April (see CNL(05)21), the industry agreed to provide comments to the Secretariat on the Williamsburg Resolution. I have now received the attached comments from Mr James Ryan, President of the International Salmon Farmers' Association. The Council may wish to consider these comments from the industry, and decide on appropriate action. The NASCO delegates to the Liaison Group had asked that a rationale for any changes be provided but the industry has not been able to do this in the time available.

Secretary
Edinburgh
27 May, 2005

CNL(05)30

Comments from the
International Salmon Farmers Association (ISFA)
May 15, 2005

Proposed revisions in **Bold**
Comments and suggestions in italics

Council

CNL(04)54

Resolution by the Parties to the Convention for the Conservation of Salmon in the North Atlantic Ocean To Minimise Impacts from Aquaculture, Introductions and Transfers, and Transgenics on the Wild Salmon Stocks

The Williamsburg Resolution

(Adopted at the Twentieth Annual Meeting of NASCO in June 2003 and amended at the Twenty-First Annual Meeting of NASCO in June 2004)

1) *In the introductory page under "The Parties"*

Please add **(See Explanatory Memorandum, Annex 8)** *to*:

NOTING that NASCO and its Contracting Parties have agreed to apply the Precautionary Approach to the conservation of salmon and acknowledging the need for measures taken in accordance with this Resolution to be consistent with the Precautionary Approach AWARE of the need for cooperation between the Parties in order to maintain and to restore the wild salmon stocks, and promote sustainable conservation and management of such stocks;

Please add the following item after "Recognising the benefits….

NOTING the progress made by the Liaison Group of the North Atlantic Salmon Conservation Organization (NASCO) and the International Salmon Farmers Association (ISFA) in establishing mutually beneficial working arrangements in order to make recommendations on wild salmon conservation and sustainable salmon farming practices that maximize potential benefits and minimize potential risks to both. (Attach as Appendix 2 Annex SLG(01)11 "Guiding Principles for Cooperation between NASCO and its Contracting Parties and the North Atlantic Salmon Farming Industry") ;

Please change the word "can" to "might" as follows:

RECOGNISING that in order to protect wild salmon stocks from adverse impacts that **might** be caused by aquaculture, introductions and transfers, and transgenics, there is a need to take into account local conditions in determining appropriate management measures;

2) ARTICLE 3 – please note revisions in bold

<u>Burden of Proof</u>

Each Party, in accordance with the Precautionary Approach, should require the proponent of an activity covered by this Resolution to provide all information necessary to demonstrate that the proposed activity will not have a **significant** adverse impact on wild salmon stocks or lead to irreversible change. **If the required information is not available and cannot be obtained at reasonable cost, the decision-making process should rely on a full Risk Assessment as outlined in Article 4.**

3) ARTICLE 5

- Minimise the risk of disease and parasite transmission **between** wild salmon stocks and all aquaculture activities, introductions and transfers.

4) ARTICLE 7 – please add second paragraph

Transgenic Salmonids

The Parties should apply the Guidelines for Action on Transgenic Salmon, CNL(97)48 (Annex 5), to protect against potential impacts from transgenic salmonids on wild salmon stocks. In view of the current lack of scientific knowledge on the impact of transgenic salmonids on wild salmon stocks, the use of transgenic salmonids should be considered a high-risk activity. There should be a strong presumption against any such use.

The International Salmon Farmers Association affirms this position in its Policy on Transgenic Salmon, which was adopted at its Seventeenth General Meeting in Galway, Ireland on September 1996: *"In accordance with sound environmental practice, the ISFA firmly rejects transgenic salmon production."*

*5) ARTICLE 9 – please add word **"significant"***

Mitigation and Corrective Measures

Where **significant** adverse impacts on wild salmon stocks are identified, the Parties should initiate corrective measures without delay and these should be designed to achieve their purpose promptly.

*6) ARTICLE 10 (additions and comments in **bold**)*

Implementation

In order to have confidence that the wild stocks are protected from irreversible genetic change, from **significant** ecological impacts and from **significant** impacts of diseases and parasites, full implementation of the measures in this Resolution and its Annexes is **recommended**. ***(Comment - If WR is non-binding on the parties and is not intended to be prescriptive "recommended" is more appropriate than "essential")*** Local conditions may warrant consideration of stronger **or more moderate** measures. **All measures should be regarded as adaptable to improved salmon aquaculture technologies and methodologies. (e.g. use of sterile fish, lice vaccine, etc.)**

Where detailed agreements are developed by a regional Commission of NASCO in support of this Resolution, they will be appended. Appendix 1 indicates the current situation within the North American Commission as outlined in the NAC Protocols (94). **Appendix 11 indicates the Canadian Code for Introductions and Transfers which will be followed in Canada.** Any further guidelines to assist in implementing this Resolution will be annexed.

7) ANNEX 1- Please note the following slightly changed defiinition

Containment of diseases and parasites: Implementation of measures to prevent the **transfer** (spread) of diseases and parasites **between** aquaculture facilities **and wild fish**.

8) ANNEX 2 - Please add the following introductory paragraph

General Measures To Minimise Impacts

This annex is designed to provide guidance to NASCO's Parties on minimizing impacts of salmon aquaculture on wild salmon stocks. The guidelines will be regularly reviewed and updated as appropriate in the light of new scientific information and changing technologies and methodologies.

9) ANNEX 2, 1. Siting and Operation of Aquaculture Activities (items in **bold**)

1.1 Salmon aquaculture facilities should only be located where hydrographical, epidemiological, biological and ecological standards can be met. Factors which may be taken into consideration include: availability of water supply and receiving waters for discharge; water quality and exchange; water depth; site protection; separation distances between aquaculture facilities; and distance from salmon rivers. Further guidance on containment is provided in Annex 3.

Existing protocols employed by the NASCO parties should be referenced here or in separate Annex e.g. Canadian Environmental Assessment Act, Environmental Management Guidelines (New Brunswick), Ireland: Environmental Impact Statement Requirements for Fish Farms and The 5 Fish Farm Monitoring Protocols on Benthic Impacts, Water Column Impacts, Sea Lice, Site Fallowing and Operations Audits (More examples could be added from other countries)

1.2 Consideration should be given to the establishment of "wild salmon protection areas" where salmon aquaculture is restricted or prohibited. Such protection areas may minimise genetic, disease, **and** parasite (and environmental – ***delete, not an issue*****) impacts. In the event wild salmon protection areas are to be used to prohibit salmon aquaculture activities a risk assessment should be conducted to determine the degree to which the protection area will effectively help protect wild salmon stocks. In areas with existing salmon aquaculture facilities that are proposed for wild salmon protection areas and in which restrictions or prohibitions on those existing facilities are proposed consideration should be given to the socio-economic impacts of imposing those restrictions or prohibitions.**

1.3 *This clause should be deleted.*

(Comment - Aquaculture-free regions already exist in all jurisdictions because of unsuitable topography. Furthermore, most jurisdictions already

have strong policies on single generation sites and adequate separation between sites. The next clause covers this question adequately).

1.4 The separation distance between aquaculture facilities at marine sites should be based on a general assessment of local conditions. Wherever possible, different generations of salmon should be reared in separate locations. As local conditions permit, a fallowing regime should be practised as a means of minimising outbreaks of disease and parasites. Aquaculture production should be adapted to the holding capacity of an individual site and should not exceed density levels based on **good science** and good husbandry practices.

1.5 Dead and dying fish should be removed ~~immediately~~ **as quickly as possible from aquaculture production facilities taking into account worker safety and weather and sea state conditions. Mortalities should be ~~and~~ disposed of, along with waste materials, in an approved manner.** Procedures should be established to address the effective removal and disposal of infectious material. Contingency plans should be established for the disposal of mortalities from emergency situations.

1.6 **Depending on local regulations and protocols,** tagging, marking, **inventory tracking systems or audited containment management systems** could be used in order to facilitate the identification of farmed salmon in the wild and their separation from wild fish to determine the source of escapes and to assess the interactions of escaped farmed salmon with the wild stocks. **These systems should be coupled with river monitoring and recapture systems that allow holding and close examination of returning fish in the rivers.**

2.6 **diseases of wild fish:** there is a need to strengthen and amend disease controls **to minimise disease transfer between salmon aquaculture activities and wild fish** ~~(ensure adequate protection of wild fish).~~

2.8 Medicines and disinfectants to control diseases and parasites must be used with care and in accordance with the manufacturer's instructions and any Codes of Practice, and in compliance with regulatory authorities.

References for Fish health management systems that are currently being implemented and cover the above items should be included here.

National Aquatic Animal Health Program (NAAHP) Canada
New Brunswick Fish Health Surveillance Program (FHSP)
Ireland: Fish Health Management Protocol (in preparation), Sea Lice Protocol.
(Other countries to follow)

10) *ANNEX 4 – Section III B*

3. Fish with restricted diseases, as defined by national, state, or provincial authorities, may be transferred between facilities or released into waters within the NASCO Convention area, provided that this does not result in changing the disease status of the receiving facility or waters. These transfers must also comply with national, state or provincial regulations.

(Comment - given the fact that stocking programmes are intentionally releasing aquaculture fish into the wild, there should be close correlation between the recommendations on disease management in fish stocking operations and those in fish farms – see Section 2, Annex 2.)

11) *ANNEX 7 – Items in bold*

Tagging and marking

Tagging and marking is being used on a small scale in order to facilitate the identification of farmed salmon in the wild and their separation from wild fish, to determine the source of escapes and to assess the interactions of escaped farmed salmon with the wild stocks. Full evaluation of those trials should be conducted in order to assess effectiveness, the feasibility of large-scale marking, and associated costs. **Consideration should also be given to food safety, product quality and animal welfare.**

Alternative production methods

(Comment - This section should be deleted as no longer relevant in light of the numerous failed commercial and experimental projects which have been carried out in many different countries over the last 25 years. The focus should be on the improvement of containment technologies and the development of suitable strains of sterile fish).

Diseases and parasites

The transmission of diseases and parasites **between** salmon reared in aquaculture **and** the wild stocks is an area of considerable concern. Research on vectors for transmission, and methods to prevent and control disease and parasite outbreaks **in wild salmon and in** aquaculture should be encouraged.

Escape Prevention

Research into escape detection technologies and improved containment systems should be encouraged.

12) Add Appendix 2

Canadian Introductions and Transfers Code