

Council

CNL(10)33

***ISFA Comments on the Draft Report of Aquaculture, Introductions and
Transfers and Transgenics Focus Area Review Group***



INTERNATIONAL **SALMON** FARMERS ASSOCIATION

May 15, 2010

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

Dear Malcom:

As promised at the April 29 and 30, 2010 Liaison meeting in London, we have compiled industry comments on the *Draft Report of Aquaculture, Introductions and Transfers and Transgenics Focus Area Review Group Report issued by the North Atlantic Salmon Conservation Organization on April 9, 2010*. After the London meeting, each of the industry associations, which are all members of ISFA, provided me with their country's comments on the Report. I have structured this response to reflect the diversity of our industry and the different perspectives and experiences of the North Atlantic countries but it still a response on ISFA's behalf. As I hope you can appreciate, we all share a common goal of conserving wild salmon, but we also have jurisdictional and operational differences that inform this collective response to the FAR.

Our general comments were provided by ISFA to the Liaison Group in the April 30 document: "ISFA Comments on the "Draft Report of the Aquaculture, Introductions and Transfers and Transgenics Focus Area Review Group" which has been revised slightly and is attached. The following document contains comments specific to each region.

We trust these will be taken with the seriousness and care with which they have been prepared and look forward to further discussions.

Yours truly,

by email correspondence

Nell Halse, President
International Salmon Farmers Association



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EAST COAST CANADA

(prepared by the New Brunswick Salmon Growers Association / NBSGA on behalf of the industry in the east coast of Canada)

Canada has a very extensive eastern region that is governed by both the federal government and four provincial governments. In fact, this region includes three zones that are designated for implementation of the protocols within the Williamsburg Resolution. All regulators and the industry in these areas are committed to protecting wild salmon and to supporting a sustainable aquaculture sector. Regulations are risk-based and are based on each unique ecosystem.

The reporting measures for the FAR report were not well understood and the reporting template proved to be restrictive and did not allow for enough information to be presented in a way that could demonstrate how progress was being made or to reflect the differences among the various jurisdictions in Canada.. Because this was also the first report of its kind, the information should form the basis from which progress can be measured in the future.

There were several issues that were raised by the Review Committee about Canada's report that require further clarification.

Initiatives for international cooperation not adequately described

Because this area was not specifically identified in the template and because space was restricted, this area was not fully explored in the Canadian FAR submission. Canada has many agreements and initiatives in place that support international and interprovincial cooperation to minimize adverse impacts on wild salmon. These activities address the following areas:

- Introductions and transfers of aquatic organisms
- Incorporation of sophisticated risk assessments tools and codified procedures
- Fish health and sea lice management

Examples of direct engagement by industry include:

- Ongoing and direct participation in the ISFA/NASCO Liaison Group
- Ongoing and direct participation in the WWF Salmon Aquaculture Dialogue
- Participation in an international sea lice research workshop hosted by Norway in February 2010.
- Hosting of two international workshops on sea lice in New Brunswick in the fall and winter of 2009-2010 that brought together researchers, industry and fish health



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experts from around the world and helped develop the framework for an Integrated Pest Management Plan and a supporting research program.

- Canada hosted and provided industry, government and science leadership at an international sea lice conference in British Columbia in May: Sea Lice 2010

In addition several east coast salmon farming companies are certified to internationally accredited third party quality and eco label programs.

Progress toward international goals for sea lice

Canada has implemented most of the best management practices and reporting and tracking mechanisms that are recommended within the Guidance On Best Management Practices SLG(09)5. Heavy sea lice loads have been the exception rather than the rule in Canada's salmon farming industry. The absence of a formal sea lice reporting program does not equate to an unaddressed problem; rather, it is indicative of the infrequency of the issue, the success of fish health management programs in the past and the affects of severe winters.

In addition, the east coast salmon farming industry, independent of regulators, is implementing an integrated pest management strategy for sea lice that involves the reporting of sea lice numbers to a third party data system with every company and farm following a standardized monitoring program. The industry is also supporting the development of a third party monitoring system that will ensure that sea lice reporting by companies is independently verified.

Monitoring sea lice numbers on wild salmon should not be the responsibility of salmon farms but rather the responsibility of federal and/or provincial authorities in some index rivers.

Action plan to minimize escapes

The potential for farm escapes is addressed within Canada's Code on Introductions and Transfers whereby a risk assessment forms part of the decision making process *before* smolts are moved from hatcheries to ocean farms. Biological risk from potential escapement is reviewed and must be deemed an acceptable risk before the introductions and transfers activity will be permitted [i.e., the salmon moved to the farm].

Escapement events are rare and fall within provincial jurisdiction. Each authority's approach may be different; however, they remain consistent with the intent of the Code and the Williamsburg Resolution. Most provinces have a Code of Containment under which salmon farms operate. Even before governance systems were implemented in regulation,



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the industry has followed a voluntary reporting practice. Examples of voluntary reports can be provided.

Measures to minimize the risk of disease and parasite transmission

Minimizing the risk of disease and parasite transmission begins with the *Code on the Introduction and Transfer of Aquatic Organisms* where fish health and pest management form an integral part of the risk assessment decision-making process. In addition, Canada is in the midst of legislative change that amalgamates this aquatic responsibility into its established terrestrial animal health agencies and provincial veterinarian systems. Canada looks forward to reporting on this progressive initiative once completed.

That this legacy of innovation has occurred within a multiplicity of jurisdictions and interests supports the notion of common interest among all parties to implement a Canadian approach to a Best Practice.

In Canada, fish health is generally under the jurisdiction of provincial governments who may take a somewhat different approach unique to each region. However, they achieve the same goal. Experience has shown that local adaptive management has generated more effective results than the initially envisioned consistent “one size fits all” approach.

Control reproductively viable Atlantic salmon and non-indigenous anadromous salmonids

Canada’s Code has been ratified by the federal government, the governments of its ten provinces and two territories and it incorporates sophisticated risk assessment tools and codified procedures, which have been recognized internationally [e.g. ICES] as being a Best Practice. NAC(05)7 does not specify what decision making tool is used by the United States.

Canada continues to use its Code to assess introductions and transfers applications. Decisions associated with the importation of “*reproductively viable Atlantic salmon and non-indigenous anadromous salmonids or their gametes*” from outside the Commission area are very rare. They would likely involve the imposition of special containment requirements to meet the risk assessment mitigation requirements of the Code to reduce risk to a level acceptable to the recipient jurisdiction. Such decisions are reported annually as required under NAC (05) 7 and are thus in compliance with established NASCO procedures. Absence of recent reports only indicates the rarity of the action.



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Classification/zoning system development

Canada does not classify its rivers with respect to introductions and transfers nor aquaculture activity. However, Canada's Code assesses every introduction and transfer within its risk assessment process for the ecological impact of potential escapement.

Permits are issued when risks are deemed acceptable [i.e., low risk] to the recipient jurisdiction.

As well, all Canadian jurisdictions undertake extensive cross-agency consultation in regards to the licensing of aquaculture activities. These reviews include the risks associated with this concern. While Canada protects its salmon resources in the area of introductions and transfers and the licensing of salmon aquaculture activity, the remaining 95% of Canadian rivers and 98% of Canada's salmon resource are remote from either activity and are thus not impacted [i.e., low risk].

Procedures to initiate corrective measures not adequately described

In Canada, jurisdictional mandates dictate the manner in which local situations are addressed. This often results in a variety of approaches being taken to achieve the same goal. While that diversity [i.e., the absence of a consistent approach] does create variations in methodologies, it does not necessarily mean that we are not dealing with the local situation. Experience shows that local adaptive management will generate a more effective approach than the initially envisioned prescriptive "consistent approach".

Canada continues to work with all parties to ensure the intent of the measures is met and that we protect the ecological integrity of our aquatic environments.

Although Canada's diverse geography and systems can create problems for reporting, it will continue to report in as complete and comprehensive manner as resources permit. In addition, all Provincial and Federal Acts and Regulations noted in the FAR enable the Minister to take various forms of action if operators fail to comply with regulations, terms and conditions of license etc., which can include the revoking of licenses.

The NBSGA had the opportunity to participate in the 29-30 April 2010 meeting of the ISFA-NASCO Liaison Group and contributed to general comments in that report. However we feel the following points should be reinforced:

Process – the process for the development of any FAR report should allow time for all countries to have the opportunity to respond and for that response to be considered prior to



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the release and circulation of any draft report. We also note that it was inappropriate for NGOs to circulate the country reports among their members when the Parties and the Industry did not have the same opportunity.

Report Structure – the Draft Report was full of opinions by reviewers that were not grounded in either science or in material submitted for review – these opinions went

beyond providing recommendations and/or feedback on where additional actions may be helpful and have no place in this report. Examples include: “resistance to sea lice treatment is a worrying development” statement on page 16; section 5.26 regarding responsibility for setting standards; section 5.28 “sea lice larvae can survive independently for 20-50 days” and page 14 Box entitled “Scale of Activities.” We ask that such unsubstantiated comments be removed from subsequent reports.

Reviewers – It would be beneficial to include biographies of the reviewers of the various country reports. There also needs to be a clear recognition that the NGOs were not engaged as reviewers and that they are, in fact, a special interest group, albeit recognized by NASCO. The NBSGSA is by definition a non-government organization and yet we were not part of this body. The NGO statements (page 17) should be included only as an appended Minority Report.

In closing the Canadian east coast salmon farming sector is committed to environmentally sustainable and economically viable operations that are focused on continuous improvement, innovation and collaboration. Our products help to eliminate pressure on wild Atlantic salmon stocks and our companies work with local salmon conservation organizations to help to rehabilitate and preserve wild salmon.

Indeed, NASCO’s role is not to regulate industries but to provide a forum where all parties can work together to ensure wild salmon stocks are protected.

NORWAY

(prepared by the Norwegian Seafood Federation / FHL)

- a) The international goals for sea lice and containment written as: *100% of farms to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farm and 100% farmed fish to be retained in all production facilities* are to be looked upon as visions that we as industry are striving to reach more than exact goals. Based on this, NASCO should focus on the parties’ progress.



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- b) The NASCO Council Report of 2009 reads: *He (the president of NASCO) noted that there had been some discussions about the involvement of the salmon farming industry, but noted that they have already been involved in the work of the Task Force and he anticipated that they would be appropriately involved in the preparation of the FARs within each jurisdiction.* This has been poorly followed up by most of the parties in the preparation of the FARs.
- c) In point 5 the Review Group underlines that some jurisdictions have not submitted FARs to NASCO. It should be mentioned in the report that NASCO has no mandatory role and it is up to each jurisdiction if and how it wants to respond. In this process, NASCO's main role is to facilitate and encourage international cooperation.
- d) Under Methodology, point d) it should be pointed out that this did not apply to the NGO-members of the review group.
- e) In point 5.16 the review group says that: *“little consideration appears to be given to the risks to the health, genetic diversity and status of wild salmonids”* when sites are applied for. This opinion of the Review Group cannot be substantiated as many, if not all, jurisdictions in NASCO have regulations and site approval processes that do take these risks into account.
- f) In point 5.25 the Review Group expresses opinions on the size of the salmon aquaculture industry and makes direct links between industry size to risks on wild populations. There is no automatic linkage between the two. Rather, it is more important to consider the regulations and enforcement of the industry and the industry's efforts towards sustainability.
- g) It is not always clear why some of the text in the Report is highlighted in bold and placed in separate text boxes.
- h) Point 5.38 is an assumption made by the NGO members of the Review Committee that is not substantiated and should either be taken out or made part of an NGO-appendix.
- i) There is a question about the time-consuming work that is required by the jurisdictions to report to NASCO. Is this the right use of resources? The main thing is the national regulations and policies and the manner in which the authorities and the industry are striving to meet common goals. There are probably better ways for the Parties to report to NASCO as part of a process for NASCO to better reach their objectives, but that is for the Parties to decide.



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When it comes to the summing up on each FAR, the following comments are relevant to Norway:

- 1) There is a lack of connection between the comments and the three bullet points
- 2) More than one third of the comments deal about *G.salaris*. There is no connection between salmon farming and the spread of *G.salaris*. The risk of spreading *G.salaris* is mainly connected to sports fishing and enhancement activities.
- 3) Of all the papers that have been published on salmon biology, possible interaction between salmon farming and wild salmon and related topics, the Review Group mentions only one model study, a model that, to our knowledge, has never been verified. This brings into question the validity of these comments made by the Review Group.

UNITED STATES

(Prepared by the Maine Aquaculture Association / MAA)

The MAA supports the initial comments provided by ISFA to the Liaison Group on the 30 April but would like to make the following points.

Jurisdictions' ability to demonstrate progress.

Throughout the document the Review Group repeatedly refers to the various jurisdictions' inability to demonstrate progress towards achievement of the Williamsburg Resolution and the subsequent guidance on BMPs. We would like to highlight two concerns.

- 1) Over the years ISFA has often indicated that the establishment of absolute measures, goals or action levels that may not be achievable in the real world will lead to false expectations, frustration and disappointment in both the parties and stakeholder groups associated with the NASCO treaty. Most recently, during the formation of the Guidance on BMPs ISFA members repeatedly expressed concerns about establishing goals on containment and sea lice management that were inherently unachievable and unrealistic. While ISFA agreed to those goals it did so with serious concerns that they would result in, and indeed guarantee, the continual criticism of the parties even if they were making determined efforts to achieve the goals. The FAR Review Group report appears to justify this concern. We respectfully suggest that the Parties re-examine what they have agreed to and determine whether they are prepared to be eternally criticised for falling short of these goals.



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2) Aside from an inherent inability to achieve absolute goals, we are additionally concerned that two factors are inhibiting the Parties' ability to demonstrate progress towards those goals: first, the timing of implementation of management measures relative to when an assessment of progress is being made and second, the lack of data with respect to wild salmon populations.

In regards to the first factor, the Review Group acknowledges in several instances that the parties and the industry have enacted significant measures that are designed to address impacts on wild salmon stocks. The report references the "wealth of regulations and measures" but notes the FARs do not contain data adequate to assess a jurisdiction's "progress." The term "progress" denotes a change in position over time. Indeed the draft review directly acknowledges this change over time concept in its report.

"4.4 The Review Group recognised that while the BMP Guidance was only agreed in 2009, NASCO's agreements relating to aquaculture, introductions and transfers and transgenics date from the early 1990s and many elements were subsequently included (my emphasis) in the Williamsburg Resolution together with the Liaison Group's 2001 Guidelines on Containment of Farm Salmon. The BMP Guidance was developed to assist in strengthening the application and interpretation of the Williamsburg Resolution. The Review Group, therefore, felt that all jurisdictions with salmon farming should be able to demonstrate clear progress towards achieving the international goals but in most cases data to demonstrate progress was not provided."

Given the FAR reporting format that focuses on reporting of the current state of affairs and the fact that many of the measures designed to address potential aquaculture impacts on wild salmon stocks have been in place for some time it is inherently difficult for the parties to demonstrate "progress." We respectfully suggest that future FAR reporting requirements include a historical summary of the regulations and measures that have already been enacted along with the time they were first put into place. We believe that this will assist the Parties in documenting the extent and speed of their progress towards achieving the international goals. ISFA believes that significant progress has been made and that the Parties and the industry are not being given credit for this because of the current reporting format and focus on achievement of absolute goals.

In regards to the second factor that the lack of data on levels of hybridisation between farmed and wild stocks and levels of sea lice in wild stocks makes any assessment of the efficacy of management measures virtually impossible, ISFA concurs with this finding and commends the Review Group for recognising that the lack of historical data makes it virtually impossible for the parties to demonstrate progress. Indeed the Review Group



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acknowledges this in section 5.22. of their report. Within the last twenty years significant measures that were designed to address potential impacts on wild salmon stocks have been enacted. Many of these actions were enacted some time ago and the lack of data on wild stocks before their enactment makes it virtually impossible to determine the efficacy of these measures. The industry has spent millions of dollars in complying with regulations, improving operations and developing new techniques that were designed to address the potential impacts on wild stocks. The parties have spent millions of dollars in developing and enforcing regulations and coordinating these efforts through NASCO.

To have imposed these costs on endangered working waterfronts in coastal communities and to have spent large amounts of public funds without any ability or effort to assess the efficacy of these investments is not responsible or effective management. Indeed the lack of retrospective data makes any Review Group's ability to assess the party's progress virtually null and void. Until NASCO and its parties address this issue, further reviews will result in the same findings as the current one and will serve no purpose except to engender further criticism of the parties and a clear documentation of NASCO's ineffectiveness. This will serve neither NASCO, the Parties nor the salmon well.

5.14 International cooperation to minimize adverse impacts on wild stocks.

The Review Group acknowledges the existence of a number of forums for international cooperation and the coordination of efforts to minimise potential adverse impacts on wild stocks but misses several important ones.

For example the Review Group's report does not reference a number of important and well developed third party certification programs such as Global Gap, the Aquaculture Certification Council, Seafood Trust, Friends of the Sea, and a number of organic certification programs. The Report does not reference the overarching initiative undertaken by the United Nations Food and Agriculture (FAO) on Guidelines for certification programs. Additionally the Report does not reference the International Standards Organisation's (ISO) aquaculture initiatives on the development of technical standards for equipment that is designed to reduce the risk of equipment failures. All of these initiatives are ongoing and will result in significant standards, certification programs and BMPs that will directly address many of the concerns expressed by the NASCO Parties.

ISFA has repeatedly expressed its concern that NASCO's focus on the development of BMPs and regulations intended to reduce potential adverse impacts on wild stocks simply duplicates these other initiatives. The fact that these efforts are not acknowledged in the FARs or in the Review Group's report heightens our concern that NASCO may be disconnected from these other important initiatives. ISFA respectfully suggests that



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NASCO invest the time and effort required to familiarize itself with these initiatives to make sure that its efforts are not duplicative and create unnecessary costs to the Parties. This effort would be consistent with the Terms of Reference for the FAR Review Group and should be included as part of the final version of the FAR Review group report.

Risk Assessments

The draft Review Group report suggests that existing risk assessment methods employed by the parties in the various NASCO jurisdictions are inadequate. Specifically in Section 5.16 of the report the review committee states:

“The Review Group notes that while there is often a requirement to consider the impacts on the marine environment (particularly benthic impacts) or exposure of the site, little consideration appears to be given to the risks to the health, genetic diversity and status of wild salmonid stocks in the decision-making process.”

We disagree strongly with this statement and are astounded that either the Parties have not more effectively communicated their risk assessment methodologies to NASCO as part of their FAR responses or that the Review Group has not understood those methodologies that were communicated by the Parties.

ISFA members must apply, through a number of methods, for the license to operate a farm in public waters in all NASCO party jurisdictions. As applicants who go through these comprehensive, extensive, costly and complicated processes, it is our experience that the potential risks to the health, genetic diversity and status of wild stocks are routinely considered during the decision making process. Indeed these standards and their consideration are explicitly articulated in all NASCO Parties’ statutes and regulations in one form or another.

ISFA respectfully suggests that it is in the Parties’ best interest to require the Review Group to specifically review each Party’s statutes and regulations and document how they do not meet the risk management goal. If this statement cannot be substantiated, the Review Group should strike it from the record.

SCOTLAND

(prepared by the Scottish Salmon Producers Organization / SSPO)

The SSPO supports the initial comments provided by ISFA to the Liaison Group on the 30 April. Additionally we would make the following points.



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General Comments

The SSPO has been generally supportive of the NASCO Focus Area Review (FAR) initiative. It has believed that the FAR process might serve to facilitate progress towards the strategic objectives of the NASCO Parties and the Atlantic salmon ‘community of interest’, of which SSPO members are a significant part.

On the basis of the *Aquaculture, Introductions and Transfer and Transgenics* FAR, SSPO continues to feel that the sharing of information contained in the FAR submissions across jurisdictional areas, national farming industries and fisheries could have benefits in promoting greater mutual understanding. However, the NASCO Reporting process on the FAR has not been a useful or forward looking exercise and we find it difficult to identify where it has added value to the information provided in the FAR reports.

The Scottish Salmon industry has a range of clearly identifiable sectors: sports and leisure angling; net-fisheries; and Salmon aquaculture for food production (farming) and river stocking. Each of these sectors ultimately relies on the ‘king of fish’, but only aquaculture is not directly dependent on the harvesting of wild fish.

It is important to state that:

- SSPO shares NASCO’s objectives *to manage salmon fisheries to promote and protect the diversity and abundance of salmon stocks*; these stocks are not only important as a basis for maintaining natural fisheries they represent the ultimate genetic resource on which the aquaculture industry is based;
- SSPO members have played a major role in the conservation of Scottish wild salmon; without the development of salmon farming the demand on Scotland’s natural fisheries may well have led to their terminal decline.
- SSPO members grow salmon in some of Scotland’s most remote, economically fragile and environmentally-valued areas of the country; they are a key part of local communities and are focused on sustainable aquaculture, supported by continuous improvement and technological innovation.

Comments on Review and Draft Report Process

Our expectation was that the NASCO review process would potentially add value to the FAR reports, possibly bringing new insights or drawing attention to features that would have benefits to the whole process. However, this has not been the case. Rather, we have an underlying concern that the investment in time and resources represented by the review was disproportionate to any discernable benefits we can identify. We believe this reflects an underlying problem in the NASCO processes. As specific points we have concluded:



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- The review process would have been more effective and would have commanded a greater respect if it had been specified more in accord with a conventional international scientific or project evaluation. A better and more uniform engagement of all sides of the Atlantic salmon community, including aquaculture producers, in the Review Group would have resulted in a more insightful and productive process.
- The review report fell short of the standards and a level of detail that would normally be expected of an international evaluation. It lacked any indication of the background or basis of selection of the review team, and the way in which the review process was undertaken was not specified.
- Whilst it is a reasonable assumption that NASCO will provide the Secretariat for the review process, the Review Group should have been led by an independent Chairman, who was not associated with any of the relevant governmental bodies or agencies or non-governmental bodies aligned with NASCO. If the review reports are to be transparent and command confidence we believe this is an essential requirement.
- The review process was fundamentally flawed in that there was no in-jurisdiction visits, to allow review members to clarify points or ask questions or understand the different approaches that are adopted. As a consequence, the review report suffers from misunderstandings and misinterpretations, which do little to commend it to those who had contributed to the FAR.

Points on EU-UK (Scotland)

The pen-picture summary (page 29 *et seq* of the Review Groups draft report) indicates that the Review Group has substantially failed to understand either the underlying philosophy or the practical details of the approach that has been adopted in Scotland. As a small country with a history of working collaboratively, we are proud to say there is a considerable record of a coordinated collaborative approach between the Scottish Government and its agencies and the finfish farming industries (including salmon and other species).

This approach has led to the publication of two Strategic Framework documents for Scottish Aquaculture, the first published in 2003 and the second in 2009. As a strategic action arising from the first of these documents, a comprehensive Code of Good Practice for Scottish Finfish Aquaculture was developed involving wide consultation, not only with the Aquaculture industry but with a very wide range of stakeholders.

This process is now being repeated not because the present Code is 'outdated in regard to containment' (as stated in the review) but because the proposals of the second Strategic



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Framework, and the recommendations of Working Groups and Sub-groups, which have been established to take forward its implementation, need to be incorporated in the Code.

Likewise the report states that ‘new initiatives for improved disease and parasite control are being developed but are not yet in place’ as if this were a criticism. However, to the contrary, this situation will, and should always be the case because the situation reflects the constant introduction of new developments and innovations. As with the repeated revision of the Code of Good Practice, it reflects the commitment of the Scottish salmon industry to continuous technological and professional development – something of which the industry is justifiably proud.

The ISFA comments on 30 April have highlighted the fact that the Review Group has in places expressed opinions rather than evidence-based comments, including paragraph 5.26 on standard setting. Reflecting this we would similarly draw attention to the statement forming the last sentence of the penultimate paragraph on page 29. This suggests that in Scotland there has been an ‘evolution in approach’ --- ‘from voluntary approaches, through accreditation schemes, such as the Code of Good Practice, to legislation and enforceable regulation’. This is simply an incorrect understanding and is misleading in its implications. Moreover, it seems to reflect the same lack of evidence-based analysis highlighted elsewhere and the Review Group’s unsupported opinion.

Finally, since the ‘conclusions’ of the review at the end of the Scotland section are not referenced to the supporting evidence, it is difficult to make comment on them. However, we particularly reject the statement that ‘adequate measures to minimise the risk of disease and parasite transmission have not been implemented’.

**ISFA Comments on the
“Draft Report of the Aquaculture, Introductions and Transfers
and Transgenics Focus Area Review Group”**

April 30, 2010

London

These comments represent ISFA’s initial feedback to the Report. It is ISFA’s intent to submit a more detailed report in time for NASCO’s next mailing.

General Comments:

The International Salmon Farming Industry shares the objective of conserving and enhancing wild salmon stocks.

- ISFA members help to preserve wild salmon by filling the consumer demand for high quality, nutritious salmon thereby reducing pressure on wild Atlantic Salmon.
- ISFA promotes an environmentally sustainable and economically viable salmon farming sector that is focused on continuous improvement, innovation and collaboration.
- Significant milestones have been reached in the areas of containment and fish health and the industry welcomes NASCO’s support for access to a full suite of tools for fish health management.

An environmentally sustainable, socially responsible and economically viable international salmon farming industry should not be impeded, but rather complemented by the work undertaken by NASCO.

Specific Comments on the Draft Report and Review Process

1. Process

A better engagement of ISFA members within the review process, both in the drafting of the FAR reports and in the Review Group itself would have led to a more effective, constructive and productive process.

The Review Process and the Report submission process is not clearly defined. The Report would be more complete if an accurate assessment of the cost were included. ISFA requests that the Liaison Group be given the opportunity for comment and input into the final report of the Review Group after the Special Session in 2010 and before NASCO 2011.

2. Clarity on Goal statements

While the Task Force affirmed the common goals of 100% of farms having effective sea lice management and the containment of 100% farmed fish in all production facilities, the Review Committee should have looked for progress towards these goals, rather than achievement. (see page 14 – box under Introduction: “...no jurisdiction was able to show that it had reached a situation where it had achieved the international goals.”) If the Review Committee only

looks for achievement of the international goal, the report will always be negative and progress will not be recognized.

3. Opinions rather than evidence and science-based comments

The Draft Report contains a number of opinions and beliefs that are not evidence-based. Such comments should be referenced to link them to the appropriate scientific background. Some examples are:

- “resistance to sea lice treatment is a worrying development” statement on page 16
- section 5.26 regarding responsibility for setting standards
- section 5.28 “sea lice larvae can survive independently for 20-50 days”
- page 14 Box entitled “Scale of Activities”
- section 5.21 “There are also instances where the value of the wild stocks has been adversely affected by impacts from aquaculture and related activities.”

4. Role of Special Interest Groups on the Review Group

There needs to be a clear recognition that the NGOs are special interest groups, albeit recognized by NASCO, not independent reviewers. The NGO statements (page 17) should be included only as an appended Minority Report.

Our understanding was that this was to be focused, tightly controlled professional Review undertaken by selected members of the review committee. However, the NGO / special interest group members of the Review Committee treated it as a public consultation and circulated the documents widely.

Unlike the NGO community, ISFA was not only excluded from the Review committee; its members were not given access to other countries' reports.

It is our understanding that members of the Review Committee did not review their own country's reports. (page 7 – 5.6 d) However, this apparently did not apply to the NGO / Special Interest representatives. ISFA views this as a clear conflict of interest.

We are very concerned with the tone and implication of Section 5.38 in the report which states:

*“The NGOs note that several of the FARs from jurisdictions with salmon farming omitted some information or procedural knowledge that is publicly available and is known to the NGOs in those jurisdictions. **With those omissions the FARs appeared to present a more favourable picture than the actual situation (ISFA emphasis) with regard to the impacts of salmon farming on the wild salmon stocks or on efforts to avoid such impacts.**”*

Is it the report's intention to suggest that some of the parties intentionally misreported and mislead the Review Group? This would seem speculative at

best and inflammatory at worst. ISFA believes that the parties responded to the FAR requests with all sincerity and request that this statement be stricken from the report.

5. Annex 1 – CV of Reviewers should be attached

It is normal practice for a Report of this nature to include an Annex with the CV of each of the reviewers and an identified Chairman. In keeping with NASCO's commitment to transparency, this should be added to the Report.

In summary, the science for management practices is changing quickly and we need to be able to bring new science to the table at all times. The reporting measures were not well understood and the reporting template proved to be restrictive and did not allow for enough information in a way that demonstrates how progress has been made.