

Agenda item 6.1 (b)  
For information

**Council**

**CNL(10)37**

***NGO Response to ISFA Comments  
on the NASCO Draft Aquaculture Focus Area Review Report***



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**The NASCO process**

1. The ISFA response demonstrates a complete lack of understanding of the role of NASCO as an organisation, the Next Steps process and the role of the NGOs accredited to NASCO in that process.
2. The objectives of NASCO are the conservation, restoration and rational management of wild Atlantic salmon. The NGOs accredited to NASCO have to demonstrate that their objectives are consistent with those of NASCO.
3. While ISFA maintains that they support those objectives, ISFA is essentially a trade association and the principal objective of a trade association is to protect and promote the interests of its members whose activity is the commercial farming of Atlantic salmon. This activity has been found to be in conflict with the management and survival of wild salmon wherever the two resources co-exist.
4. NASCO is an inter-governmental treaty organisation to which there are currently six signatories (Iceland having resigned). NASCO operates on the basis of consensus, so no agreement can be reached without the full agreement of all the Parties.
5. In 1994, NASCO agreed the Oslo Resolution, with the aim of minimising the impacts of salmon aquaculture on wild salmon; this was superseded in 2003 by the Williamsburg resolution, with the same over-arching objectives.
6. In 2004, as part of a 20 year Review, NASCO agreed to introduce its “Next Steps” process. This process included the production, by each jurisdiction within the Parties, of an Implementation Plan, describing in detail how they were managing, and planned to manage, their wild Atlantic salmon stocks in line with and to implement NASCO agreements on habitat, fisheries management and impacts of aquaculture. As part of this process, the Parties agreed a three year cycle to examine in detail the implementation of NASCO agreements on fisheries management (year one) habitat (year two) and aquaculture and introductions (year three). This is the Focus area Review process in which we are currently engaged.
7. A further agreement by the Parties enabled full participation by the NGOs accredited to NASCO, not just in The Next Steps process, but in the annual meeting and any intercessional meetings that take place. The aim of all this is to make NASCO a fully transparent organisation, and through its accredited NGOs, more publicly accountable.
8. **So, in the context of the Aquaculture FAR, NGOs are not “special interest groups” as has been alleged; they are an integral part of the NASCO process, a process which has been fully ratified by the Parties at NASCO.**
9. The NGOs at NASCO (34) represent more than 5 million members across the North Atlantic dedicated to the objectives of the organisation. It is worth reinforcing here, that like salmon farming, wild fish represent a hugely valuable

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resource, both in terms of their sporting and commercial exploitation, often benefiting remote rural communities.

**Response to ISFA comments**

10. The Aquaculture FAR is not an independent report; that was not the objective. The FAR is an internal report for NASCO, examining how jurisdictions are implementing the Williamsburg resolution and managing the impacts of aquaculture on wild Atlantic salmon.

The draft report will be discussed at NASCO Council in June 2010. The fact that ISFA has been given an opportunity to comment on the draft report, ahead of the Parties, is of some concern to NGOs as it perhaps indicates undue influence by the Industry on the NASCO process. This could be regarded as a testament to the transparency of the organisation, **but the NGOs remind the Parties at NASCO that in this forum they are representing wild Atlantic salmon, and not the salmon farming industry.**

11. **The idea that the process would have been more effective if IFSA had been part of the Review group is rejected.**

The whole point of this exercise is that it is a review of how jurisdictions are implementing (or not) the Williamsburg Resolution, and this review had to be carried out by individuals, nominated by the Parties and the accredited NGO Group, on behalf of wild salmon interests, independent of the aquaculture industry. **Self-assessment, like self-regulation, clearly does not work.**

12. **Criticism of the competence of the reviewers is unacceptable.**

The representatives of the Parties and NGOs were selected by the Parties (Canada, USA, Norway and Faroes) and NGOs (US and Norway) for their knowledge and experience of impacts of aquaculture on wild salmon. The addition of cvs might be helpful when the report is finally published.

13. **Criticism of the science involved in these assessments is also unhelpful.**

The scientific advisor to the Review Group is a former Chairman of the ICES Advisory Group to NASCO, and an eminent wild salmon scientist. Moreover, there is a wealth of scientific evidence to demonstrate the various impacts of salmonid aquaculture on wild stocks, much of it summarised in the NASCO/ICES Bergen symposium of 2005. A more recent summary of this research across the N. Atlantic has been compiled and published by the UK Salmon & Trout Association.

14. **While it would be premature to claim that all this research was definitive, there is certainly more than enough evidence to justify taking action to protect wild fish on the basis of the precautionary approach, an approach to which all the NASCO Parties have agreed.**

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15. ISFA challenges many statements of the Review Group as “opinions”, yet their own document is full of their own opinions, such as:  
    *“ISFA promote an environmentally sustainable salmon farming sector...”*  
    *“ISFA help to preserve wild salmon by filling the consumer demand etc.”*  
The country comments are also littered with criticism of these “opinions” which are actually based on the science referred to in para 13.
16. Acceptance by ISFA that salmonid aquaculture can and does impact wild salmon is an essential precursor to taking action to minimise those impacts.  
The targets set out in the Best Management Practice recently agreed by the Task Force were a good step forward. **Challenging peer- reviewed science on the subject now, is not helpful.**
17. ISFA has also challenged the phraseology of the Review Group conclusions.  
Broadly, these were that no jurisdiction had demonstrated full compliance with NASCO guidelines on minimising the impacts of aquaculture on wild Atlantic salmon. ISFA suggested that this approach did not allow for measurement of progress towards those objectives.
18. **The NGOs have some sympathy with this complaint, and suggest that a “scorecard” approach would enable comparison both within and between individual jurisdictions.**

#### **NGO Conclusions**

19. The NASCO/ISFA Task Force has produced appropriate goals on escapes and sea lice control which the Industry, Parties and NGOs have all endorsed as Best Management Practice (BMP).

NGOs were extremely concerned to read the statement from ISFA that these BMP goals were “unachievable” and “unrealistic”. **Backsliding on only recently agreed goals by the Industry makes the value of dialogue with the Industry questionable, and reinforces NGO concerns that dialogue is being used as a cloak of respectability and a vehicle for postponing the firm regulatory action that is required from governments to protect wild Atlantic salmon from the impacts of salmonid aquaculture.**

**The NGO conclusion is that the salmon aquaculture industry should concentrate on delivering real, measurable and visible progress towards those targets, which is an essential step by NASCO governments in measuring that progress, rather than attempt to undermine and discredit the Focus Aquaculture Review,**

20. **The accredited NGOs at NASCO fully support the Aquaculture FAR Group report, and call on the Parties at NASCO to endorse it, with minor modifications as suggested.**

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- 21. Anything less than full endorsement will expose the organisation and its governments to public ridicule in the wider community of wild Atlantic salmon conservation interests.**