

IP(20)09_EU – Ireland

November 2020 Evaluation of the Revised Implementation Plan under the Third Reporting Cycle (2019 – 2024) from the Review Group to EU – Ireland

NASCO considers that the provision of Implementation Plans, together with annual reporting of progress on actions contained within them, is one of the most valuable mechanisms that it has developed. It is a vitally important mechanism to strengthen implementation of NASCO’s Resolutions, Agreements and Guidelines. Parties to NASCO have committed to the conservation of wild Atlantic salmon. Parties’ / jurisdictions’ Implementation Plans set out their planned actions and these are reviewed by an expert Review Group. Reporting is carried out annually on these Plans (see <https://nasco.int/conservation/implementation-plans-and-reporting/>).

The Council of NASCO agreed, in September 2020, that all Implementation Plans would be reviewed again in November 2020, in line with the Enhanced Guidance from the Council, CNL(20)55. This meant, in each case, that the most recent version of each Implementation Plan was reviewed, whether updates had been provided in 2020 or not, even where the Review Group had previously found the Implementation Plans to be satisfactory.

The Review Group noted that EU – Ireland did not submit a revised Implementation Plan following the November 2019 evaluation from the Review Group.

In line with the ‘Guidelines for the Preparation and Evaluation of NASCO Implementation Plans and for Reporting on Progress’, [CNL\(18\)49](#), (the IP Guidelines) and the ‘Enhanced Guidance for the Review of Implementation Plans’, [CNL\(20\)55](#), the infographic below shows the overview of the Review Group’s evaluation, in November 2020, of EU – Ireland’s Implementation Plan. Sections / areas considered to be ‘satisfactory’ are shown in green, and those which are ‘unsatisfactory’, in red.

	Questions on Salmon Management				Threats / Challenges to Wild Salmon			SMART Actions			Mandatory Actions
	Introduction / Background	Management of Salmon Fisheries	Habitat Protection & Restoration	Aquaculture, Introductions & Transfers & Transgenics	Management of Salmon Fisheries	Habitat Protection & Restoration	Aquaculture, Introductions & Transfers & Transgenics	Management of Salmon Fisheries	Habitat Protection & Restoration	Aquaculture, Introductions & Transfers & Transgenics	
EU – Ireland											

The Review Group reassessed the responses to questions, the threats / challenges and the actions in conjunction with the Enhanced Guidance, CNL(20)55, looking in greater detail at, and providing feedback relating to the achievement of, NASCO’s Resolutions, Agreements and

Guidelines. The Review Group, therefore, considered that EU – Ireland’s Implementation Plan requires further work to achieve a satisfactory rating across all sections / areas of the Plan.

The Review Group considered the response to question 1.4 to provide a clear and succinct explanation. Additionally, the Review Group considered the response to question 2.6 to be a very clear and full response, demonstrating good compliance with appropriate sanctions where necessary. The Review Group also considered Action H2 to be a very clear description of a SMART action, listing clear milestones and targets.

Questions on Salmon Management: the Review Group considered that the responses to the questions asked in two of the four sections were satisfactory. However, clear improvements are required in several responses to the questions on salmon management in the other two sections to enable all of the sections to be considered as satisfactory. On reassessment, the Review Group considered that, although the response to question 2.3(a) remained 1, the responses to questions 2.3(b) and (c) and 4.2(a) were no longer considered to be satisfactory. The Review Group has provided detailed feedback to each response that is considered to be unsatisfactory.

Threats / Challenges to Wild Salmon: the Review Group considered that the identified threats and challenges to the management of wild Atlantic salmon identified under each theme all related clearly to NASCO’s Resolutions, Agreements and Guidelines.

SMART Actions: all of the ‘Management of Salmon Fisheries’ and ‘Habitat Protection and Restoration’ actions within the Plan were considered to be satisfactory, i.e. the Review Group considered that those actions move EU – Ireland clearly towards the implementation of NASCO’s Resolutions, Agreements and Guidelines. Two of the three ‘Management of Salmon Fisheries’ actions and all of the ‘Habitat Protection and Restoration’ actions were also considered to be SMART. However, action F2 was not considered to be in line with all of the SMART criteria. The Review Group considered that none of EU – Ireland’s three actions on ‘Aquaculture, Introductions & Transfers & Transgenics’ were either SMART or satisfactory. Additionally, it considered that action A1 was not relevant to the threat / challenge identified in the Plan.

Mandatory Actions: the Review Group considered this section to be unsatisfactory. A mandatory action on mixed-stock fisheries is not included and should be. Although EU – Ireland’s Plan does contain mandatory actions on the management of sea lice and containment, the Review Group considered that these actions on sea lice and containment require substantial revision.

In the following Evaluation Form, the Review Group has provided guidance on its recommendations for improvements.

Evaluation in 2020 of Revised Implementation Plans Based on Enhanced Guidance from the Council

Under NASCO's third reporting cycle the Review Group is asked to evaluate the Implementation Plans submitted by Parties / jurisdictions in three key areas of assessment, by:

- 1. identifying whether the answers by each Party / jurisdiction to the questions posed in the Implementation Plan template are satisfactory;*
- 2. identifying clearly that the threats and challenges to the management of wild Atlantic salmon identified under each theme are related to NASCO's Resolutions, Agreements and Guidelines; and*
- 3. assessing the description of each action to ensure that it adheres to the 'SMART' descriptors such that progress over time can be assessed objectively.*

This is described in detail in the 'Guidelines for the Preparation and Evaluation of NASCO Implementation Plans and for Reporting on Progress', [CNL\(18\)49](#).

- 1. Answers to each question in the Implementation Plan template, [CNL\(18\)50](#), are to be assessed as:*
 - 1. Satisfactory answers / information;*
 - 2. Unsatisfactory (including unclear or incomplete answers / information or clear omissions or inadequacies).*
- 2. NASCO's Resolutions, Agreements and Guidelines as they apply to the third cycle of reporting are listed throughout the Implementation Plan template, [CNL\(18\)50](#).*
- 3. The Review Group will be required to assess the description of each action using the 'SMART' criteria laid out in the new Guidelines document, [CNL\(18\)49](#), thereby assessing the quality of each of the actions, not just how clearly the actions are stated.*

Additionally, in 2020, the Council has provided enhanced guidance to the Review Group in their 'Enhanced Guidance for the Review of Implementation Plans' ([CNL\(20\)55](#)) whereby each section / area of the Implementation Plan will be scored as satisfactory or unsatisfactory; the actions will also be assessed on their ability to move the Party / jurisdiction clearly towards the implementation of NASCO's Resolutions, Agreements and Guidelines.

Through this process it will be possible to determine whether the Implementation Plan provides a fair and equitable basis for assessing the progress that the Party / jurisdiction will make in implementing NASCO's Resolutions, Agreements and Guidelines.

Where a section / area is deemed by the Review Group to be unsatisfactory, the Implementation Plan will be returned to the Party / jurisdiction. The Review Group will provide a clear explanation of its decision to the Party / jurisdiction and, where feasible and appropriate, offer specific suggestions / recommendations for how it could be improved. The tables below, for each of the three main areas to be assessed, provide a template for evaluation in each case.

Party: European Union

Jurisdiction/Region:

Ireland

Assessment area 1. Are the questions posed in the Implementation Plan template answered satisfactorily?

#	Question in IP Template	Assessment (1 or 2)	Draft feedback on any improvements required (for answers assessed as 2)	Comments relating to previous review round: changed as requested by IP RG?
1. Introduction				
1.1	What are the objectives for the management of wild salmon?	1		
1.2	What reference points (e.g. conservation limits, management targets or other measures of abundance) are used to assess the status of stocks?	1		
1.3	What is the current status of stocks under the new classification system outlined in CNL(16)11?	1		
1.4	How is stock diversity (e.g. genetics, age composition, run-timing, etc.) taken into account in the management of salmon stocks?	1		
1.5	To provide a baseline for future comparison, what is the current and potential quantity of salmon habitat?	1		
1.6	What is the current extent of freshwater and marine salmonid aquaculture? <i>Append one or more maps showing the location of aquaculture facilities and aquaculture free zones in rivers and the sea.</i>	1		
1.7	Please describe the process used to consult NGOs and other stakeholders and industries in the development of this Implementation Plan.	1		
Overall score by Review Group for 1. Introduction			Satisfactory	

2. Management of Salmon Fisheries: <i>In this section please review the management approach to each of the fisheries in your jurisdiction (i.e. commercial, recreational and other fisheries) in line with the relevant NASCO Resolutions, Agreements and Guidelines. For Parties / jurisdictions that prosecute mixed-stock fisheries, there should be at least one action related to their management.</i>				
2.1	What are the objectives for the management of the fisheries for wild salmon?	1		
2.2	What is the decision-making process for the management of salmon fisheries, including predetermined decisions taken under different stock conditions (e.g. the stock level at which regulations are triggered)?	1		
2.3	(a) Are fisheries permitted to operate on salmon stocks that are below their reference point (e.g. Conservation Limits)? If so, (b) how many such fisheries are	(a) 1 (b) 2 (c) 2	The Review Group considered that, as catch and release fisheries operate on stocks	

	there and (c) what approach is taken to managing them that still promotes stock rebuilding?		below their CLs, answers should be provided for parts b) and c).	
2.4	(a) Are there any mixed-stock salmon fisheries? If so, (b) how are these defined, (c) what was the mean catch in these fisheries in the last five years and (d) how are they managed to ensure that all the contributing stocks are meeting their conservation objectives?	1		
2.5	How are socio-economic factors taken into account in making decisions on management of salmon fisheries?	1		
2.6	What is the current level of unreported catch and what measures are being taken to reduce this?	1		
2.7	Has an assessment under the Six Tenets for Effective Management of an Atlantic Salmon Fishery been conducted? If so, (a) has the assessment been made available to the Secretariat and (b) what actions are planned to improve the monitoring and control of the fishery? (c) If the six tenets have not been applied, what is the timescale for doing so?	1		
Overall score by Review Group for 2. Management of Salmon Fisheries			Unsatisfactory	

3. Protection and Restoration of Salmon Habitat: <i>In this section please review the management approach to the protection and restoration of habitat in your jurisdiction in line with the relevant NASCO Resolutions, Agreements and Guidelines.</i>				
3.1	How are risks to productive capacity identified and options for restoring degraded or lost salmon habitat prioritised, taking into account the principle of 'no net loss' and the need for inventories to provide baseline data?	1		
3.2	How are socio-economic factors taken into account in making decisions on salmon habitat management?	1		
3.3	What management measures are planned to protect wild Atlantic salmon and its habitats from (a) climate change and (b) invasive aquatic species?	1		
Overall score by Review Group for 3. Protection and Restoration of Salmon Habitat			Satisfactory	

<p>4. Management of Aquaculture, Introductions and Transfers and Transgenics</p> <p><i>Council has requested that for Parties / jurisdictions with salmon farms, there should be a greater focus on actions to minimise impacts of salmon farming on wild salmonid stocks. Each Party / jurisdiction with salmon farming should therefore include at least one action relating to sea lice management and at least one action relating to containment, providing quantitative data in Annual Progress Reports to demonstrate progress towards the international goals agreed by NASCO and the International Salmon Farmers Association (ISFA):</i></p> <ul style="list-style-type: none"> • 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 farms; • 100% farmed fish to be retained in all production facilities. <p><i>In this section please provide information on all types of aquaculture, introductions and transfers, and transgenics (including freshwater hatcheries, smolt-rearing etc.</i></p>			
4.1	(a) Is the current policy concerning the protection of wild salmonids consistent with the international goals on sea lice and containment agreed by NASCO and ISFA? (b) If the current policy is not consistent with these international goals, when will current policy be adapted to ensure consistency with the international goals and what management measures are planned to ensure achievement of these goals and in what timescale?	a)1 b)2	<p>a) The Review Group appreciated the clear answer to the question but noted that the current policy is not consistent with the international goals on sea lice as outlined in SLG(09)5.</p> <p>b) The Review Group noted that the current broad policy is not in line with SLG(09)5. It also noted the intention not to introduce additional SMART actions for sea lice control.</p>
4.2	(a) What quantifiable progress can be demonstrated towards the achievement of the international goals for 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 sea lice? (b) How is this progress monitored, including monitoring of wild fish? (c) If progress cannot be demonstrated, what additional measures are proposed and in what timescale?	(a) 2 (b) 2 (c) 2	<p>a) The Review Group appreciated the clear answer to the question but noted that there is no quantifiable progress demonstrated towards the achievement of the international goals on sea lice as outlined in SLG(09)5.</p> <p>b) The Review Group noted that current monitoring of wild salmon is not systematic and would wish to see the SMART action identified included in the Implementation Plan actions.</p> <p>c) The Review Group noted that no additional measures are proposed.</p>
4.3	(a) What quantifiable progress can be demonstrated towards the achievement of the international goals for achieving 100% containment in all (i) freshwater and (ii) marine aquaculture production facilities? (b) How is this progress monitored,	(a) (i) 2 (a) (ii) 2 (b) 2	(a)(i) The Review Group considered that there is no quantifiable progress

	including monitoring of wild fish (genetic introgression) and proportion of escaped farmed salmon in the spawning populations? (c) If progress cannot be demonstrated, what additional measures (e.g. use of sterile salmon in fish farming) are proposed and in what timescale?	(c) 2	demonstrated and that data should be included in this response. (a)(ii) The Review Group noted that EU – Ireland acknowledges that no progress can be demonstrated. (b) The Review Group noted that this response is inconsistent with the guidelines, SLG(09)5 (Reporting and Tracking for containment) and expected to see data from salmon rivers and fisheries included. (c) The Review Group expected progress to be demonstrated in line with SLG(09)5 and noted that no additional measures are proposed.	
4.4	What adaptive management and / or scientific research is underway that could facilitate better achievement of NASCO’s international goals for sea lice and containment such that the environmental impact on wild salmonids can be minimised?	1		
4.5	What is the approach for determining the location of aquaculture facilities in (a) freshwater and (b) marine environments to minimise the risks to wild salmonid stocks?	1		
4.6	What progress has been made to implement NASCO’s guidance on introductions, transfers and stocking?	1		
4.7	Is there (a) a requirement to evaluate thoroughly risks and benefits before undertaking any stocking programme and (b) a presumption against stocking for purely socio-political / economic reasons?	1		
4.8	What is the policy / strategy on use of transgenic salmon?	1		
4.9	<i>For Members of the North-East Atlantic Commission only:</i> What measures are in place, or are planned, to implement the eleven recommendations contained in the ‘Road Map’ to enhance information exchange and co-operation on monitoring, research and measures to prevent the spread of <i>Gyrodactylus salaris</i> and eradicate it if introduced, including the development and testing of contingency plans?	1	The Review Group, while acknowledging the ongoing good work presented in relation to management of <i>Gyrodactylus salaris</i> , noted that it is not clear if each of the 11 recommendations detailed in the ‘Road Map’ is being dealt with.	

Overall score by Review Group for 4. Management of Aquaculture, Introductions and Transfers and Transgenics	Unsatisfactory
--	-----------------------

Assessment area 2. Are the threats and challenges to the management of wild Atlantic salmon identified under each theme related clearly to NASCO’s Resolutions, Agreements and Guidelines?

2.8 Threats identified to wild salmon and challenges for management associated with their exploitation in fisheries, including bycatch of salmon in fisheries targeting other species	Assessment (yes / no)	Draft feedback on any improvements required	Comments relating to previous review round: changed as requested by IP RG?
Threat / challenge F1	Yes		
Threat / challenge F2	Yes		
Threat / challenge F3	Yes		
Overall score by Review Group for 2.8: threats / challenges associated with exploitation in fisheries, including bycatch of salmon in fisheries targeting other species			Satisfactory

Copy and paste lines to add in other challenges in the relevant Implementation Plan

3.4 Threats identified to wild salmon and challenges for management in relation to estuarine and freshwater habitat.	Assessment (yes / no)	Draft feedback on any improvements required	Comments relating to previous review round: changed as requested by IP RG?
Threat / challenge H1	Yes		
Threat / challenge H2	Yes		
Threat / challenge H3	Yes		
Threat / challenge H4	Yes		
Overall score by Review Group for 3.4: threats / challenges in relation to estuarine and freshwater habitat			Satisfactory

Copy and paste lines to add in other challenges in the relevant Implementation Plan

4.10 Threats identified to wild salmon and challenges for management in relation to aquaculture, introductions and transfers, and transgenics.	Assessment (yes / no)	Draft feedback on any improvements required	Comments relating to previous review round: changed as requested by IP RG?
Threat / challenge A1	Yes		
Threat / challenge A2	Yes		
Threat / challenge A3	Yes		
Overall score by Review Group for 4.10: threats / challenges in relation to aquaculture, introductions and transfers, and transgenics			Satisfactory

Copy and paste lines to add in other challenges in the relevant Implementation Plan

Assessment area 3. Does each action adhere to the ‘SMART’ descriptors laid out in the new Guidelines document, CNL(18)49?

As a reminder, the ‘SMART’ approach includes reporting on both quantitative and qualitative information. Quantitative information is expected wherever possible and should be presented to demonstrate progress made over the period of the plan towards NASCO’s goals. This should be clear and concise. Where a deviation must be made from a quantitative metric, the reason for the deviation should be explained.

2.9 What SMART actions are planned during the period covered by this Implementation Plan (2019 – 2024) to address each of the threats and challenges identified in section 2.8 to implement NASCO’s Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for the management of salmon fisheries?								
#	Action in IP Template	Is the action clearly related to stated threat / challenge?	Is it ‘SMART’? (yes / no)	If ‘no’, which descriptor needs to be reflected more clearly in the action?	If the proposed monitoring is qualitative (as allowed in the Guidelines), is the reason and proposed non-quantitative alternative for monitoring progress acceptable?	Does the action move the Party / jurisdiction clearly towards the achievement of NASCO’s Resolutions, Agreements and Guidelines?	Given the previous question, is the action considered satisfactory or unsatisfactory overall?	Comments relating to previous review round: changed as requested by IP RG?
F1	Protection against illegal fishing	Yes	Yes. However, the Review Group requested that the fisheries protection activities are also reported on within the APR, and the description of the action be limited to			Yes. The Review Group considered that this relates to CNL(09)43 Section 2.3.	Satisfactory	

			the bullet points.					
F2	Carcass tagging and logbook scheme	Yes	No	‘Specific’ and ‘Measurable’ need to be reflected more clearly. The Review Group was still unclear exactly what this action will entail. The Review Group considered it is unclear what legal advice is sought and whether this would provide a milestone. The Review Group considered that to aid monitoring of progress, a baseline for logbook returns would be helpful.		Yes. The Review Group considered that this relates to CNL(09)43, section 2.2, and is moving towards CNL(93)51.	Satisfactory	
F3	IYS promotion	Yes	Yes			Yes. The Review Group considered that raising the awareness of wild Atlantic salmon increases knowledge of NASCO’s objectives.	Satisfactory	

Overall score by Review Group for 2.9: SMART actions to implement NASCO’s Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for the management of salmon fisheries	Satisfactory
---	---------------------

Copy and paste lines to add in other actions in the relevant Implementation Plan

3.5 What SMART actions are planned during the period covered by this Implementation Plan (2019 – 2024) to address each of the threats and challenges identified in section 3.4 to implement NASCO’s Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for the Protection, Restoration and Enhancement of Atlantic Salmon Habitat?								
#	Action in IP Template	Is the action clearly related to stated threat / challenge?	Is it ‘SMART’? (yes / no)	If ‘no’, which descriptor needs to be reflected more clearly in the action?	If the proposed monitoring is qualitative (as allowed in the Guidelines), is the reason and proposed non-quantitative alternative for monitoring progress acceptable?	Does the action move the Party / jurisdiction clearly towards the achievement of NASCO’s Resolutions, Agreements and Guidelines?	Given the previous question, is the action considered satisfactory or unsatisfactory overall?	Comments relating to previous review round: changed as requested by IP RG?
H1	Ireland’s River Basin Management Plan	Yes	Yes. However, the Review Group noted that the threat includes forestry, for which there is no action.			Yes. The Review Group considered that this relates to CNL(10)51, section 3.5h.	Satisfactory	
H2	Hydromorphological threats	Yes	Yes			Yes. The Review Group considered that this relates to CNL(10)51, section 3.5 e and f.	Satisfactory	
H3	Impact of climate change on Irish Fisheries	Yes	Yes			Yes. The Review Group considered that this	Satisfactory	

						relates to CNL(10)51, section 3.8.		
H4	Invasive species	Yes	Yes			Yes. The Review Group considered that this relates to CNL(10)51, section 3.8.	Satisfactory	
Overall score by Review Group for 3.5: SMART actions to implement NASCO's Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for the Protection, Restoration and Enhancement of Atlantic Salmon Habitat							Satisfactory	

Copy and paste lines to add in other actions in the relevant Implementation Plan

4.11 What SMART actions are planned during the period covered by this Implementation Plan (2019 – 2024) to address each of the threats and challenges identified in section 4.10 to implement NASCO's Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for aquaculture, introductions and transfers, and transgenics?								
#	Action in IP Template	Is the action clearly related to stated threat / challenge?	Is it 'SMART'? (yes / no)	If 'no', which descriptor needs to be reflected more clearly in the action?	If the proposed monitoring is qualitative (as allowed in the Guidelines), is the reason and proposed non-quantitative alternative for monitoring progress acceptable?	Does the action move the Party / jurisdiction clearly towards the achievement of NASCO's Resolutions, Agreements and Guidelines?	Given the previous question, is the action considered satisfactory or unsatisfactory overall?	Comments relating to previous review round: changed as requested by IP RG?
A1	Sea lice infestation	No	No	The Review Group considered that this action is not specific in protecting wild salmon and it is		No. While it is evident that lice monitoring is taking place on farmed salmon, it is not clear to the Review Group how	Unsatisfactory	

				therefore not relevant.		this action will enable progress towards achievement of the goals for effective sea lice management, as outlined in SLG(09)5. The Review Group recommended that monitoring also takes place on wild salmonid populations, as also outlined in SLG(09)5.		
A2	Containment	Yes	No	The Review Group considered that this action is not specific in protecting wild salmon and it is therefore not relevant. Timely needs to be reflected more clearly. Measurable – there is no specific baseline or target described.		No. It is not clear to the Review Group how this action will enable progress towards achievement of the goals for containment, as outlined in SLG(09)5.	Unsatisfactory	
A3	Animal health and disease	Yes	No	Specific, Measurable and Timely need to be reflected more clearly. This information could		No. The Review Group recognised EU – Ireland’s efforts to address NASCO’s Resolutions,	Unsatisfactory	

				be split into separate actions with corresponding milestones. Each action should have a timescale, expected outcome and approach to monitoring. This would aid annual reporting.		Agreements and Guidelines, but the action does not demonstrate progress clearly towards achieving the objective of the Williamsburg Resolution, CNL(06)48.			
Overall score by Review Group for 4.11: SMART actions to implement NASCO's Resolutions, Agreements and Guidelines and demonstrate progress towards achievement of its goals and objectives for aquaculture, introductions and transfers, and transgenics							Unsatisfactory		

Copy and paste lines to add in other actions in the relevant Implementation Plan

Mandatory action check	Is such a mandatory action required for this Party / jurisdiction?	Is such an action contained in the Implementation Plan?
For Parties / jurisdictions that prosecute mixed-stock fisheries, there should be at least one action related to their management.	Yes	No
Each Party / jurisdiction with salmon farming should include at least one action relating to sea lice management.	Yes	Yes, but it requires substantial revision
Each Party / jurisdiction with salmon farming should include at least one action relating to containment.	Yes	Yes, but it requires substantial revision
Overall score by Review Group		Unsatisfactory