

IP(20)09_EU – Spain (Cantabria)

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

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 thanks EU – Spain (Cantabria) for submitting their revised Implementation Plan, and for revising their Plan following the previous evaluations 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 – Spain (Cantabria)’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 – Spain (Cantabria)											

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 – Spain (Cantabria)'s Implementation Plan requires further work to achieve a satisfactory rating across all sections / areas of the Plan.

The Review Group considered Actions F4 and F5 both to be very clear, succinct, and well-described actions.

Questions on Salmon Management: clear improvements are required in several responses to the questions on salmon management to enable each of these sections to be considered as satisfactory. The responses to question 2.7 and 4.7 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 actions within the Plan were considered to be satisfactory, i.e. the Review Group considered that the actions move EU – Spain (Cantabria) clearly towards the implementation of NASCO's Resolutions, Agreements and Guidelines even where the action was not entirely in line with the SMART criteria. Two of the actions were not considered to be in line fully with the SMART descriptors; these are both in the 'Management of Salmon Fisheries' section.

Mandatory Actions: the Review Group considered that there should be an action related to the management of containment given the freshwater production of salmonids present in EU – Spain (Cantabria). The section was, therefore, considered to be unsatisfactory overall.

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: Spain (Cantabria)

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

#	Question in IP Template	Initial 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?	2	The Review Group welcomed details provided on monitoring and looked forward to seeing progress under action F3. See CNL(09)43 sections 2.4 and 2.5 for guidance on establishing reference points.	
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	A map is required	
1.7	Please describe the process used to consult NGOs and other stakeholders and industries in the development of this Implementation Plan.	2	An IP should be prepared in consultation with NGOs and other relevant stakeholders and industries (reference the Guidelines document CNL(18)49)	
Overall score by Review Group for 1. Introduction			Unsatisfactory	

2. Management of Salmon Fisheries:

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.

2.1	What are the objectives for the management of the fisheries for wild salmon?	1	It was recognised that there is an action identified to address this (F3).	
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 there and (c) what approach is taken to managing them that still promotes stock rebuilding?	1		
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?	2	The Review Group noted that there are no quantitative data to estimate unreported catch. The response to this question could be improved by indicating what measures in the future could be considered to collect quantitative data or describing how they have established that the unreported catch is negligible.	
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?	2	The assessment has been conducted and received by the Secretariat. Please review your response in light of this. The Review Group recommended that the contents of the Six Tenets assessment are reflected in EU – Spain (Cantabria)’s Implementation Plan.	
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?	2	The Review Group requested that a summary of the measures be presented. Each answer should be self-contained and not rely on any other document for explanation. See CNL(10)51 and CNL(09)34 for guidance.	
Overall score by Review Group for 3. Protection and Restoration of Salmon Habitat			Unsatisfactory	

4. Management of Aquaculture, Introductions and Transfers and Transgenics <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>				
<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. 				
<i>In this section please provide information on all types of aquaculture, introductions and transfers, and transgenics (including freshwater hatcheries, smolt-rearing etc.</i>				
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	1	The Review Group recognised from the response in 1.6 that there are no marine fish farms in EU-Spain (Cantabria); given this, the answer in	

	consistency with the international goals and what management measures are planned to ensure achievement of these goals and in what timescale?		4.3(a)ii was considered to be appropriate here. The Review Group requested that both parts of this question are addressed.	
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?	1	The Review Group recognised from the response in 1.6 that there are no marine fish farms in EU-Spain (Cantabria); given this, the answer in 4.3(a)ii was considered to be appropriate here.	
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, 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?	(a)(i)+(ii)1 (b) 2 (c) 2	(b) It is unclear how potential escapes are monitored. To address this the Review Group considered that EU-Spain (Cantabria) could describe quantifiable progress that shows that no escapes from these facilities have occurred over a certain period of time, SLG(09)5. (c) This question has not been answered.	
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	The Review Group recognised from the response in 1.6 that there are no marine fish farms in EU-Spain (Cantabria); given this, the answer in 4.3(a)ii was considered to be appropriate here. The Review Group requested that the containment element of this question is also addressed.	
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	The Review Group seeks clarification on whether the current information	

			provided is in accordance with the Williamsburg Resolution CNL(06)48. The Review Group considered that the response to this question could be improved by referencing action A1.	
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?	2	Further detail on measures to ensure that the salmon stocking does not detrimentally impact on wild salmon stocks is required, consistent with the guidance, SLG(09)5.	
4.8	What is the policy / strategy on use of transgenic salmon?	1	The Review Group seeks clarification on whether EU Policy is followed in relation to this.	
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?	2	Sufficient information is not provided to show how 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	Initial 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.	Initial 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		
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.	Initial 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			
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	Reducing over-exploitation of MSW in rivers through restrictions on landing large fish.	Yes	No.	‘Measurable’ - this action was recognised as good overall but the measurable element provides no baseline from which to assess change. The Review Group sought further information on how the reduction of exploitation will be achieved.		Yes. The Review Group considered that this relates CNL(09)43, section 2.3.	Satisfactory	

F2	Joint promotion, with stakeholders, of catch and release in rod fisheries.	Yes	No	'Measurable' - this action was recognised as good overall but the measurable element provides no baseline from which to assess change.	Yes. The Review Group considered that this action is more suited to qualitative reporting.	Yes. The Review Group considered that this relates to CNL(09)43, section 2.7.	Satisfactory	
F3	Establishing Conservation Limits and management targets from all salmon stocks	Yes	Yes			Yes. The Review Group considered that this relates to CNL(09)43, section 2.4.	Satisfactory	
F4	Establishing in-river exploitation levels, through tagging/returns & catch and effort statistics	Yes	Yes			Yes. The Review Group considered that this relates to CNL(09)43, section 2.4..	Satisfactory	
F5	Running monitoring in index river (smolt & spawner census, tagging of smolt, electrofishing).	Yes	Yes			Yes. The Review Group considered that this relates to CNL(09)43, section 2.4.	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	Improve fish passage by removing dams, installing fishways, removing culverts and upgrading road-stream crossings	Yes	Yes			Yes. The Review Group considered that this relates to CNL(10)51.	Satisfactory	
H2	Undertaking further research on impacts of hydropower (including cumulative effects) and taking account of best scientific advice to maintain etc.	Yes	Yes			Yes. The Review Group considered that this relates to CNL(10)51.	Satisfactory	
H3	Provision of appropriate river flows by implementing sustainable abstraction programmes	Yes	Yes. However, the Review Group would still like to see the targets to be included to allow			Yes. The Review Group considered that this relates to CNL(10)51.	Satisfactory	

			measurable progress to be assessed in the Annual Progress Reports					
H4	Taking an integrated catchment management approach to reduce the impact of land use, through implementing the SACs Management Plans	Yes	Yes. However, the Review Group would still like to see the targets to be included to allow measurable progress to be assessed in the Annual Progress Reports			Yes. The Review Group considered that this relates to CNL(10)51.	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	Regulate salmonid stocking in Cantabrian rivers by implementing and enforcing existing and proposed new stocking programme. The scheme will include limiting stock levels and preserving the genetic integrity of stocked fish. Out of catchment introductions of fish will be forbidden	Yes	Yes		The Review Group considered that this action is more suited to qualitative reporting.	Yes. The Review Group considered that this is consistent with CNL(06)48.	Satisfactory	
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							Satisfactory	

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.	No	Not applicable
Each Party / jurisdiction with salmon farming should include at least one action relating to sea lice management.	No	Not applicable
Each Party / jurisdiction with salmon farming should include at least one action relating to containment.	Yes	No
Overall score by Review Group		Unsatisfactory