



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
1315 East-West Highway  
Silver Spring, Maryland 20910

February 5, 2021

Mr. Serge Doucet  
President  
North Atlantic Salmon Conservation Organization  
11 Rutland Square  
Edinburgh EH1 2AS  
Scotland, UK

Dear Mr. Doucet:

Thank you for your letter and for providing the outcome of the review of U.S. Revised Implementation Plan for the Third Reporting Cycle (2019-2024) (IP). We appreciate the hard work of the Review Group (RG) and have carefully considered the comments and feedback the RG has provided. In your letter, you requested that we provide details on how the United States will demonstrate progress toward the attainment of NASCO's Resolutions, Agreements, and Guidelines in the areas where deficiencies have been identified. Specifically, the RG identified deficiencies in the U.S. IP in the Questions and Actions section pertaining to Aquaculture, Introductions, Transfers, and Transgenics, as well as the mandatory actions. Below, we provide details on the next steps we intend to take to address these deficiencies.

In Section 4.2, the RG concluded that the United States has not provided information that demonstrates progress toward attainment of NASCO's goal of 100 percent of farms having 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. We have provided detailed information in our IP and in a November 16, 2020, letter to you on our stringent monitoring, control, and enforcement regime for pathogens and sea lice in salmon aquaculture operations. Through this regime, we believe that we are meeting the NASCO goal of effective sea lice management. In our November 16, 2020, letter to you, however, we also explained that providing quantitative results of monitoring programs (e.g., lice counts) for Atlantic salmon being reared in net pens for commercial aquaculture is not currently possible, as Maine state law prohibits the government from making public any data that can be linked to individual people or businesses. The RG determined that our answers in Section 4.2 were unsatisfactory because, irrespective of our inability to share the quantitative results of the monitoring programs, we still did not address whether there was any increase in sea lice loads from aquaculture facilities relative to background levels or of lice-induced mortality on wild salmonids.

In Section 4.11, Action A1, the RG found that the action identified in our IP to address sea lice attributable to marine net pens was unsatisfactory. Although the RG recognized U.S. efforts to manage sea lice on farmed salmon in netpens, the RG noted that this action does not demonstrate progress toward the goal of no increased sea lice loads or lice-induced mortality of wild salmonids. Because Action A1 was considered unsatisfactory, the RG group determined we did not meet the requirement that each party have at least one action relating to sea lice management.



To address the elements of our IP that the RG determined were unsatisfactory, the United States is committed to doing the following work over the remaining term of the IP:

1. Explore the efficacy, cost, and resource requirements to conduct plankton trawls in areas with and without aquaculture netpens to determine if there is a significant difference in sea lice presence in the water column associated with aquaculture facilities.
2. Explore the efficacy, cost, and resource requirements to employ sentinel cage studies to quantify sea lice loads on wild salmonids in areas with and without aquaculture facilities.
3. Contingent upon the efficacy assessments noted above and securing the required resources, conduct one or both studies to assess sea lice impacts to wild salmonids.
4. Review the results of the study(s) to assess potential impacts of sea lice loads on wild salmonids in areas proximate to net pens.
5. If appropriate, secure resources necessary to establish a long-term monitoring program to ensure the United States is achieving NASCO's goals for sea lice management.

If you have any questions regarding this correspondence, please contact [REDACTED]  
NMFS Greater Atlantic Regional Fisheries Office [REDACTED]  
[REDACTED]

Sincerely,

[REDACTED]