



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

Dear Mr. Doucet:

Thank you for your correspondence of 21 December 2020, providing Canada with the review of our revised Implementation Plan (IP) for the Third Reporting Cycle (2019-2024). You requested that we provide details on how Canada will demonstrate progress toward the implementation of NASCO's Resolutions, Agreements, and Guidelines in the areas where deficiencies have been identified.

Canada appreciates the hard work of the Review Group, including the detailed feedback provided on our IP. However, we are concerned that this round of review does not seem to reflect the greater flexibility in assessing IPs that was laid out in the Enhanced Guidance for the Review of Implementation Plans agreed in September 2020, especially as it relates to the requirement that all actions be 'SMART.' The result is that all jurisdictions but one have received reviews finding that at least some components of their IP are unacceptable.

Canada remains engaged in domestic efforts to advance NASCO objectives and to implement many elements of NASCO's instruments. However, there are several criteria and format obstacles within the IP process that Canada is unlikely to surmount if the process is not revised. In particular, the federal structure where aquaculture in Atlantic Canada is managed at the provincial level makes it difficult and often impossible to satisfy the requirements for 'SMART,' granular detail on aquaculture management. Furthermore, in at least some provinces there is privacy legislation that prevents answering some of the questions, such as specific details and locations of escapes.

In the revision of our IP in late 2020, we attempted to provide information to demonstrate the broad range of policies and actions being taken to advance wild Atlantic salmon conservation, in line with NASCO instruments, but some of these responses were still deemed 'unsatisfactory.' Given that we do not expect to be able to satisfy the requirements of the IP process as they have been interpreted by the Review Group, it is not clear whether further revisions of our IP would be worthwhile.

During the upcoming webinar, we encourage discussion to not only clarify any unclear aspects of our IP, but also to assess whether the current IP process is meeting its intended objectives.



Thank you again for your time and efforts in facilitating this process. If you have any questions regarding this correspondence, please don't hesitate to contact us.

Sincerely,

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