

31 March 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 the UK's Revised Implementation Plans (IPs) for the Third Reporting Cycle (2019-2024). We recognise and appreciate the hard work of the Review Group and have carefully considered the comments and feedback the Review Group has provided.

In your letter, you requested that we provide details on how the United Kingdom will demonstrate progress towards the attainment of NASCO's Resolutions, Agreements, and Guidelines in the areas where deficiencies have been identified.

In preparing our response, the respective reporting jurisdictions within the UK, namely, England & Wales, Scotland and Northern Ireland have provided, where possible (in the attached annexes), further information directly relating to the comments received from the review group. In addition, where necessary, further consideration will be given to those comments/issues that we can't address yet and details will be included into the IPs due in November 2021.

The UK looks forward to discussing our IPs further on 5<sup>th</sup> May and hope that this further discussion will enable us to work with you and secure a satisfactory outcome with regards to the UK's 2019-2024 IPs.

Yours sincerely,

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**Annex A** – England and Wales  
**Annex B** – Northern Ireland  
**Annex C** – Scotland

## **Annex A**

### **England and Wales:**

For England and Wales' IP, the Review Group identified a number of areas where answers were deemed to be unsatisfactory: in the Questions section for the Management of Salmon Fisheries and the Questions and Actions sections concerning Aquaculture, Introductions, Transfers & Transgenics. Below, we provide details of the next steps we intend to take to address these deficiencies.

In Section 2.3 b), *the RG concluded that it could not ascertain how many fisheries were permitted on stocks below their Conservation Limits*. This will be provided in the revised IP. In 2020, rod fisheries were permitted on 41 principal salmon rivers where salmon stocks were below their CLs. To protect stocks and aid their recovery, all these rivers were subject to stringent catch and release requirements, with 24 rivers requiring mandatory catch and release (C&R), 3 with 100% voluntary C&R agreements and the remaining 14 required to achieve 90% or higher voluntary C&R. (Providing an average for the fishery of 93% C&R.) In addition, all 44 'recovering' salmon rivers in England have mandatory C&R. Across England and Wales, no net fisheries were permitted to take salmon.

In Section 4.1, *the RG recognised that there is no marine salmonid aquaculture in England and Wales but requested clarification on whether EU – UK (England and Wales) has an aquaculture policy, especially on containment in freshwater, SLG(09)5*. This will be provided in the revised IP. The policy for the 13 land based freshwater salmonid aquaculture sites (of which 5 are closed recirculation sites) in England and Wales, requires screening to prevent escapes and the ingress of salmon at all life stages, conforming to the technical standards set out in the *Screening for intake and outfalls: a best practice guide* and is required under environmental regulations.

In Section 4.3 b), *the Review Group was unclear how reporting and tracking, as outlined in SLG(09)5, is conducted and reported, particularly in relation to freshwater containment*. This will be provided in the revised IP. Freshwater rearing of salmon is confined to juvenile stocking on a very few rivers in England, with all stocking restricted to within catchment and based on local broodstock to ensure genetic integrity. Hatcheries are required to comply with the *Screening for intake and outfalls: a best practice guide*. 'Escapes' from these sites are not routinely reported as they are not deemed to present a risk. Observations of escapes from marine aquaculture are captured from angler reports and through our surveillance fish traps on the Rivers Dee, Lune and Tamar.

In Section A4, *the RG struggled to understand how this action will demonstrate measurable benefits to wild salmonids*. We will seek to clarify this in the revised IP. The purpose of this action, as outlined, is to ensure a) that all freshwater aquaculture sites do not have an adverse environmental impact on salmon and b) that any proposed marine aquaculture site complies with the regulatory framework in order to protect wild salmon. The approach to monitoring the effectiveness of this action will be reported in the Annual Progress Report with for (a) the number of consent

breaches and (b) the details of marine aquaculture applications and conditions applied being provided.

## **Annex B**

### **Northern Ireland:**

Northern Ireland is appreciative of the comments received from the NASCO IP Review Group (RG) on its IP and any general queries raised by the RG will be clarified in the updated version of the IP to be provided later this year. The RG identified three areas where the actions described were deemed to be unsatisfactory and we have provided clarification on these areas below. We would hope that with these changes the NI IP could be deemed satisfactory at the next stage of the review process.

In Section H5, the RG deemed that our action was not SMART, however our IP actually states, “To enhance degraded habitat or improve salmon habitat on **2 Primary salmon rivers** annually in NI with rivers below CL being prioritised”. From the text included in the RG comments this target of 2 rivers may not have been considered by them. This would equate to a minimum of 2km of upgraded river habitat per year and we could include this target in the Action description in our revised IP.

In Section A1 to Assess baseline sea lice levels on R Bush wild salmon remote from NI Aquaculture production, the RG deemed that our “action described did not address the challenge because it remains unclear how monitoring adult salmon returning to the River Bush addresses the challenge outlined”. As a result, the overall score for Section 4.11 was deemed unsatisfactory due to failure at this single action. Migration patterns of adult fish are likely to swim near aquaculture sites in NI and Scotland before returning to the Bush and therefore sea lice numbers may be influenced by this. The River Bush lice index provides a useful, long term dataset of lice burden on a typical wild salmon stock. The river Bush research platform also provides opportunities to expand local research on sea lice. For example, in 2021 a supplementary objective of the ongoing smolt telemetry research at the Bush station will focus on the directionality of outgoing tagged smolts to determine initial emigration orientation and whether smolts migrate east towards the coast of Scotland or west towards the open Atlantic. The directionality of initial smolt emigration will improve understanding of migration pathways at sea and the potential risks of interaction with regions used for aquaculture production. In SLG(09)5 Guidance table under the Section Reporting and Tracking it advises to monitor “Lice on Wild salmonids compared to areas with no salmon farms” – The monitoring of Bush salmon for lice meets the guidance to monitor areas with no salmon farms. This action is of course linked to that proposed at A6 of our IP, which seeks to establish long term monitoring through the establishment of a sea lice-mortality risk index in wild anadromous salmonids in an area with aquaculture production. An alternative would be to simply remove this proposed action A1 from the NI IP.

Within each IP under the Aquaculture Section – “Each Party / jurisdiction with salmon farming should include at least one action relating to sea lice management” the RG deemed that the NI IP did not meet this requirement. However there two actions on sea lice at sections A3 and

A6 which should meet this requirement. One of these actions were listed in the previous version of the IP which was deemed satisfactory by the RG at the time of that review.

## **Annex C**

### **Scotland:**

The UK-Scotland Implementation Plan is prepared by Marine Scotland on behalf of the Scottish Ministers and sets out the Scottish Government's high-level plans for the management and protection of wild Atlantic salmon during the reporting cycle 2019-2024. The Scottish Government is grateful to the review group for their comments on the November 2019 draft of the plan.

Some of the planned work and research planned for the year 2020 could not be progressed due to pressures and restrictions arising from the coronavirus pandemic. Similarly, no revision of the draft implementation plan was undertaken during 2020 due to pressures of other business, including our response to the pandemic. It is, however, the Scottish Government's intention to revise the implementation plan taking account of the reviewers' comments in good time to resubmit a further, final version before November 2021. The comments below outline those areas where particular issues have been raised by the review group, which the Scottish Government will aim to address in the next version of the plan.

In Sections 1 and 2 of the plan the review group has raised questions around the number of salmon rivers in the stock classification. As previously explained, the NASCO database of salmon rivers in Scotland is based on detail, which is now more than 30 years old, and does not reflect the actuality of salmon stocks or distribution in Scotland. In 2015-2016 Marine Scotland introduced a new methodology for assessing the conservation status of salmon in Scottish rivers. This assesses stocks over 173 rivers or assessment groups of rivers. These are referenced in statute by an outflow point which defines each catchment. These catchments will in many cases include tributary rivers, streams and burns which had been individually named in the previous database. However, we do not believe that it is sensible or practical to undertake a detailed assessment for each of these minor tributaries. Nevertheless, the status of those waters is included within the overall catchment assessment. We will seek to clarify this point further in the revised plan.

For Section 2.4, the review group has asked for greater detail on mixed stock fisheries. We will endeavour to provide more detailed, up-to-date information in the next version of the plan. Similarly, we will provide further information for Section 2.5 on social economic factors taken into account when deciding on the management of salmon fisheries.

On Section 3, the Scottish Government is pleased to note that the review group found this to be generally satisfactory. However, we note that there are a number of areas where further clarification is sought, or where some improvements have been indicated.

In particular, the review group has sought further information on the post-EU exit position with regard to such matters as the water framework directive and the habitats directive. The Scottish Parliament has recently enacted The UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021 which establishes a new

framework for environmental governance in Scotland. The Act confers on the Scottish Government a broad power to make regulations corresponding with or implementing EU laws, similar to the power previously prescribed by the European Communities Act 1972. In addition, Environmental Standards Scotland has been established, initially on a non-statutory basis. This is a new, independent body to consider the implementation of and compliance with environmental law in Scotland, which will be formally established later in 2021. Further information on this will be given, as well as further detail on the current review of river basin management plans.

On Section 4, we note that the review group generally felt that this part of the draft plan was unsatisfactory. Overall, the review group appears to feel that the narrative does not properly indicate how the Scottish Government is working towards NASCO's overall aims. We will review these sections closely to see how best to address these concerns in the next version of the plan. We will also, in this regard, consider how to address the review group's criticism that appropriate mandatory actions have not been indicated with regard to sea lice management or containment.

More generally, we have noted comments about appropriate numbering for individual actions and will adjust the implementation plan accordingly. The review group also notes that a number of the actions set out are not considered to be SMART. We will seek to address this in the next version of the plan. However, a number of the actions set out relate to taking forward ongoing research work or scoping further studies to identify issues and possible solutions. In these areas it may be necessary to indicate the "direction of travel" as opposed to firm target dates.

Once again, the Scottish Government is grateful for the review group's comments, and trusts that the information above will reassure the President that we will seek to address the issues raised in the November 2020 review of the UK - Scotland Implementation Plan.