

***Question and Answer Session held during the Special Session of the Council:
Evaluation of Implementation Plans / Annual Progress Reports Under the
Third Reporting Cycle (2019 – 2024)***

The presentation is available here: [Presentation on the IPs / APRs from the Chair of the Review Group](#)

Dave Meerburg (Atlantic Salmon Federation): I'm Dave Meerberg, Atlantic Salmon Federation. Thanks, Cathal, for explaining again to us, you explain each year very well, and I believe in a year previous or two I may have made the comment, and I haven't seen there's been any change, but it just is really surprising to me. When I look at the Implementation Plans (IPs) this year for example, I see five IPs for Spain. For very, very small parts of Spain that have one or two rivers.

I see an IP for EU or UK – Northern Ireland, and then I look and I see an IP for Canada. And I think I've commented before, that, at least for Canada, because there's very different rules and regulations applied in the different provinces of Atlantic Canada, and different jurisdictions are in control of some of those things, I would certainly recommend that the Canadian IP and APR process in the future should at least be broken down by four or five different regions. Or provinces, or however Canada would wish to approach it.

But it just seems you must have had to spend a fair bit of time in each one of those five EU – Spain IPs, and yet it doesn't seem that if you're spending equivalent amounts of time on one item, like one part of Spain... If you're spending that amount of time on Canada. Canada's much more complex than that.

Cathal Gallagher (Chair of the IP / APR Review Group): I don't want to come in too much for Canada, but I suppose that's a very good point, and maybe that's something that could be considered in the next cycle. Spain is broken up that way, and the reason is, of course, that Spain has individual government jurisdictions in those areas that have responsibility for fish.

I know that that's the same in Canada from reading the Plan, and I know it's difficult for colleagues in Canada to even collate a national plan because all of that is very different. I don't know if anyone from Canada would like to comment on that? Doug?

Doug Bliss (Canada): thank you very much, and Dave, as always, thank you for your question. Yes, so, I do want to first thank all the members of the Committee who go through this. It's a fairly significant process every year, it takes a lot of time and energy of the NASCO Secretariat, Party members and everyone to not only put Plans together but for the meeting, I think it was a five-day meeting and preparations.

I think as we have moved on in the whole IP process, we have found that there's certainly improvements. Cathal, in your Committee's report you talked about moving forward in terms of developing measurable metrics that you can report on things of this nature. So, I think comments like Dave's and yours are all very important elements to our discussion about the fourth reporting cycle and should be considered.

So, maybe I'll just read something as well, and I think it really speaks to Dave's question, actually. Canada is a large and complex country. You've learned about that complexity, for example, in the ways in which we share jurisdictions, and our sheer size, throughout this year's meeting. And while we in Canada accept that we can and need to do better for Atlantic salmon

and indeed for our reporting and our measures. Canada also recognises that some of the Review Group's dissatisfactions with our actions relate more to our difficulty in collating and reporting data across five provinces and well over 800 to 900 rivers. Canada recognises the need for introspection. We hope to enhance our ability to track and report in our progress reviews as part of our larger domestic effort to build a more cohesive, co-ordinated narrative around our conservation and restoration effort of our Atlantic salmon through the wild Atlantic salmon conservation strategy. Thank you.

Cathal Gallagher (Chair of the IP / APR Review Group): thanks, Doug. And I know we're tight for time, so if there are any other questions for the process or the IP Review Group?

Arnaud Peyronnet (President): I also wanted to thank the Review Group for all the work over the years. We know that this is a process that has improved, but the efforts going in are really, really serious. It's also very important and very difficult for the Parties. We know that we have some jurisdictions who find it difficult to provide an IP, although there's very good work going on the ground, and I think people should keep that in mind.

So, I think it's important now to open the floor for discussions on specific questions that you may have. You may have particular considerations, things that you want clarifications for and so on. So, the floor is open. So, Niall, please.

Niall Greene (Salmon Watch Ireland): well, at first, I'd like to start off by associating myself with the comments about the work of the Review Group. They brought great rigour and process and indeed, objectivity to us. The amount of work involved is quite humongous. I was on the Review Group for years, some years ago, and I was very pleased to get off it. Sitting in judge and jury on the work of the jurisdictions is tough work.

People in NASCO are probably at this stage a bit fed up with hearing NGOs from Ireland banging on about salmon farming. But the truth of the matter is that we have no national forum within which the kind of issues we have can be thrashed out. Even not resolved, just thrashed out, just consulted on, and that results in quite a lot of recourse through the courts on environmental issues and so on. So, I'll keep any comments I have to make as short as possible, and I have quite a few questions.

The first question I have is only, I fear, somewhat tangentially concerned with the APRs. But in the past few weeks there has been an article published by Barry and others, describing a project in which they tracked smolts from the northeast of the Republic of Ireland, going up the Irish Sea and into the North Channel. And the research, to a fairly high degree of confidence, confirms a routing that people suspected was the one the smolts were taking. It appears to take them quite close, because the North Channel is a very narrow channel, to concentrations of salmon farms in Scotland. Concentrations of salmon farms, and concentrations of sea lice, obviously. So, the potential for smolts from Ireland to be interfered with in that journey by salmon farming in another jurisdiction, I think raises some serious questions. Not so much under the Habitats Directive because the UK is no longer subject to that Directive, but it raises law of the sea issues about the migration of fish.

So, this is a short-notice question about EU and UK, but I wonder if there are any initial thoughts by either delegation on that subject? Ireland, by international standards, has a tiny, almost miniscule salmon farming industry, which is declining. But even the small number of farms that we have still in existence, they're virtually all sited in a way which causes them to interfere with the migration of wild salmonids. It is an extraordinary feature of the Irish system that there is no salmon farm in Ireland that has ever been subjected to the rigours of modern environmental evaluation, the application of the best scientific advice available, and so on. Because the licences which they initially had and which should have been coming up over the

past 20 years for review and extension or denial have been the subject of a temporary piece of legislation introduced about 20 years ago, which allowed their existing licence to continue beyond its expiry date if they simply notified the minister that that's what they would like. So, as a result, no rigorous assessment has been made of the impact of those farms. So, the first question I have is whether the Irish authorities now have any plans to regularise that situation.

I then have a few questions arising from the APR, from Section 3.3, and the first is in relation to Action A1, which promises a revised sea lice protocol, but no indication as to when that's going to be issued. Also under A1 it's stated that no breaches of trigger levels have occurred with sea lice since July '22. Now, selecting July '22 as your baseline very conveniently ignores the critical period that led up to that July '22, March, April and May, and nowadays part of June. So, perhaps we could be enlightened about why that particular dateline was chosen and not, perhaps, a more critical one that would show that many individual farms certainly exceeded in '22 and may even have exceeded in '23.

Action A2 promises a new protocol on escapees, and the same question arises. When are we going to get it? Action A2 also refers to the fact that there were no officially reported escapes during 2022. I don't think I'm being mischievous by suggesting that implies that there may have been unreported escapes, and I'd welcome a comment on that. Irish salmon farms have increasingly gone over to the use of fish as a means of cleaning lice, lumpsuckers and wrasse. The lumpsuckers come from breeding stations, but hundreds of thousands of the wrasse are being collected in the wild and then transported into farms with no obvious environmental assessment of what impact that has on the areas where the fish were gathered and where they are being planted.

As I said, the Irish industry is very small. A tiny, open-cage industry, and I should say in parentheses here that in Salmon Watch we're not opposed to salmon farming. We're opposed to open-cage salmon farming. But there's a growing acceptance in all circles, of sea lice and escapee damage. There are significant and growing disease problems, which are being exacerbated by climate change. High mortality and up to 40% of the smolt implant dying in the course of their maturing, and that raises many issues, including animal welfare issues.

There's declining employment in the sector, and of course there's rigorous opposition from NGOs to new licences and that is gumming up the system, including leading to legal actions. So, it's a wonder why Ireland continues with open-cage farming when it could be devoting its energies to closed containment. That's the conclusion of what I wanted to say, Mr President.

Arnaud Peyronnet (President): thank you, Niall. Yes, indeed, those issues I just recall have been raised in the past and they keep coming back. This is important, because this is also one of the areas of the IPs and APRs which is systematically highlighted by the Review Group as problematic for the Parties. So, I was wondering if the EU could provide some replies?

Denis Maher (European Union): thank you, Mr Chair, and thank you, Niall, for the questions. Also, to acknowledge the work of Cathal and the Review Group, it is a truly amazing collaborative effort which keeps people like me on my toes. As does Niall.

So, in relation to the first question, I think as Niall has pointed out, this report, Barry *et al*, is relatively recent. I think our initial review of it, my own from a policy perspective and Inland Fisheries Ireland from a technical perspective, is that we need a little more time to consider it comprehensively. But we are alive to the potential threat to Irish smolts, and indeed smolts emanating from other parts – the UK in particular. At certain points, as it transitions along the Scottish coast and past, effectively, a narrow corridor, there is quite a bit of aquaculture. So, our initial view is that there was a high level of confidence in the sample size. Despite the fact that it's small in relation to the indications that are coming from the report. We would like to

suggest that we would liaise closely with our colleagues in UK – Scotland, when we’ve had the opportunity to examine the report in more detail. And obviously we’d be happy to keep Niall and the NGO Group advised of that liaison.

So, I’m sure I can rely on our colleagues in UK – Scotland, to participate in that when we’ve had a chance, and indeed they’ve had a chance to review the report in a more comprehensive fashion. Unless UK – Scotland want to add anything there?

Alexander Kinninmonth (United Kingdom): thanks very much. I’m Alex Kinninmonth from the Scottish Government, the UK delegation. Well, while I’ve got the microphone, I’ll also add thanks to Cathal and the Review Group for all their work. Yes, on this specific point, as Denis has pointed out, scientists from the Scottish Government’s Marine Directorate have been partners in the research project that’s been mentioned there. And yes, we’re considering the findings and we’re committed to liaise with our colleagues in Ireland and across the rest of the UK on those findings. But just to be clear that the Scottish Government and Scottish Ministers take the issue of declining salmon populations extremely seriously.

There’s a lot of information in our IP and APR, and I do encourage you to look at that, but just last week, the Scottish Government’s main environmental regulator, the Scottish Environment Protection Agency, opened a consultation. It will take place over the next 14 weeks, and that’s on proposals for a new Sea Lice Risk Assessment Framework that would apply an evidence-based sea lice exposure threshold during the critical migration period to salmon farms. That will apply in over 120 wild salmonid detection zones on Scotland’s west coast and Western Isles. The west coast and islands are the only areas where salmon farming is permitted under National Planning Policy. So, as I say, that 14-week consultation will take place, and we’ll look to see the implementation of that framework by the end of this year in a phased way on new and expanding farms, but also existing farms.

That is part of a really important programme of work which reflects Scottish Ministers’ commitment to better protect our wildlife and the wildlife of our neighbours, critically in these circumstances, and the environment. It really will see a significant change in the approach of how we manage interactions between wild and farmed fish in Scotland. Thank you.

Denis Maher (European Union): thanks, I look forward to working with Alex and liaising with Alex. I don’t want to ignore the other questions that Niall has asked. I am Ireland’s, I suppose, leading policy maker for wild fish, not for aquaculture. But two of our colleagues from the department and agency responsible for the development and regulation of aquaculture are online and they’ll be in a position to respond.

Ultan Waldron (European Union): Ultan Waldron is my name, I’m head of Aquaculture and Foreshore Management Division in the Department of Agriculture, Food and the Marine in Ireland, and I have responsibility for the processing of licence applications for aquaculture. I am joined by my colleague, Neil Ruane, from the Marine Institute, so I might ask Neil to supplement some of the more technical questions. Just firstly, I welcome the opportunity to address you, the findings in the report and the review. We’d certainly be interested in engaging further on that.

I would ask if there’s any guidance from the Review Group as to how one does actually achieve a satisfactory status? There’s a couple of colours on the map, we’d obviously always like to be in the green, but there’s three in particular that we’d like to further engage on, if there’s any guidance from the NASCO Committee in that space we would welcome it.

In response to some of the questions: there are a number of salmon farm applications on hand with us at the moment and they’re currently going through the environmental assessment processes that Niall mentioned. We were faced with quite a challenge a number of years ago

in terms of a backlog which meant the priority in numbers terms were concentrated on other parts of the aquaculture backlog to licence those.

So, we are looking at the salmon farm questions. As Niall mentioned it is quite a small number that we're looking at. I think we've got about just over 30 on hand to process. They will be subject to the full rigours of the environmental assessment and will comply with all EU as well as national legislation in terms of the environmental assessment process.

In terms of consulting and engaging with the sector, each of those applications is subject to a statutory as well as a public period of consultation. So, everybody has an opportunity to provide input into the licencing process in the country, and those factors are taken into consideration. Ultimately, we are guided by the science, so if the appropriate assessments or the environmental assessments dictate that a licence cannot be issued, well, then that's the result. And that has been the case in the past for other licence applications. They get refused where the science says no, amongst other factors which the minister of the day has to consider when a licence is being put forward for consideration.

I think that's the main questions that were asked of me. As Denis says, he has responsibility for the wild fish stocks. So, I don't know if Neil wants to add anything to that, and if I need to clarify anything further, please don't hesitate to ask further questions.

Neil Ruane (European Union): thank you, Ultan. Yes, just some small comments in relation to sea lice. I'm Neil Ruane, I'm the manager for the Aquaculture Section here at the Marine Institute in Ireland, and we oversee the running of the national sea lice monitoring program in the country. Just some comments then, in relations to sea lice. July of last year was not meant to be a baseline, it was just a simple statement of fact in the report for last year, that since July of 2022 until the end of that year, within that reporting period there were no breaches of our national sea lice trigger levels. Obviously, in the graph in the report, you could see that we had 93% of inspections below trigger levels. Therefore, there were some breaches prior to that time. All of that information is available in our Annual Sea Lice Report for 2022, which is available on the Marine Institute website.

In relation to upcoming actions, we do have plans to revise the National Sea Lice Pest Management Strategy in Ireland, and this is linked in with the National Aquaculture Strategy, which is due to be published soon. As far as I'm aware, that had been prepared primarily by BIM in conjunction with the Department of Agriculture, and that will have a number of action points for the next cycle of that plan. Some of those points will include sea lice monitoring, and ensuring that, as best we can, that the programme that we operate is operated under the best information, the best scientific evidence available to us at the time. I think that's all I have for the moment, thank you.

Ultan Waldron (European Union): if I could just add one additional point, just in terms of transparency about the licencing process. Last year we launched, and this is in conjunction with our colleagues in the Marine Institute and with certain mapping with the assistance of the National Parks and Wildlife Service, we launched an online viewer. So, anybody can view any of the licence sites around Ireland and click on them, it will give certain information. We are trying to get more information onto that site, but it'll tell you where the site's located, what they're licenced for and the species that they're licenced to farm, whether that is salmon farming, mussels, oysters, etc. So, that's publicly available to anybody who wants to gain access to it. It's called [AQUAMIS](#).

Arnaud Peyronnet (President): thank you, Ultan and Neil. Just before we go there were two additional questions, I think. One regarding a new protocol on escapees, and one regarding the use of wild wrasse. Do you have any information on those?

Ultan Waldron (European Union): the protocol on escapees, we haven't had any reports of escapees, not in my time and certainly right before that. So, there is a strict design protocol there for any operators that is agreed with their marine engineers who operate in that space.

I wasn't aware there was an issue with the actual protocol, and certainly we encourage any members of the public, or NGOs or for that matter our colleagues in the IFAs to contact us with reports of any escapes. But there hasn't been any reported to us.

Neil Ruane (European Union): yes, we do have plans to develop a protocol for reporting of escapes to outline the procedure and the protocol, because there are different stipulations depending on the age of each company's aquacultural licence and when it was granted. We would like to bring all the available information together into one protocol so that it's clear for everyone what is required to report, and to who. Also, we will be reaching out with our colleagues, not only in the department, but also in Inland Fisheries Ireland for any information or any additional stipulations they would like to see included in that protocol.

Ultan Waldron (European Union): the additional question was on the use of lumpsucker or wrasse. I can only say to Niall, if he wanted to supply additional information through Denis to ourselves, we can certainly engage in that. Because it's taking fish from the wild, so that's not under our competence. So, I would need to follow-up on that separately, if that's okay?

Denis Maher (European Union): thank you, and just to say thank you to you, Ultan, and to Neil for coming on the call. I think from an NGO point of view, if there's anything more specific you want to raise with me, I will liaise with you internally at home, and I'll keep in touch.

Noel Carr (Federation of Irish Salmon Sea Anglers): Noel Carr from Federation of Irish Salmon Sea Anglers. Thanks Niall and Ultan for addressing this. Our concern is about the responsibility for the organic label and the production in Ireland for issuing the organic signal. Do you, under your Head of Agriculture Department, have responsibility for that and monitoring that, and especially the stock that comes in from Scotland at the moment at Donegal, Rinmore? Because that's where quite a lot of the product goes back organically labelled. Thanks.

Arnaud Peyronnet (President): thank you, Noel. Neil, do you want to answer?

Ultan Waldron (European Union): no, just within the division answer it's just unfortunate that we're having a national conversation at an international forum. I'm happy to provide answers to those questions, but in terms of organic farming, no, we are not responsible, or myself personally responsible, it's just for the licencing of the actual production, the certification or the processing.

I know definitely there is a role from organic certification, and BIM will be involved in the marketing side of it. But I think if you could give me some more specific details I will certainly ensure that an answer is provided to you.

Arnaud Peyronnet (President): very good. Thank you, gentlemen, and we'll move on now. Are there any other questions regarding other APRs? Steve, please, go ahead.

Steve Sutton (Atlantic Salmon Federation): Steve Sutton, I have a question for Canada on their Annual Progress Report. In the Canadian APR there's a very brief mention of the development of a tool for identifying European introgression. I believe that relates to a paper published last year by scientists at Fisheries and Oceans Canada, describing a discovery of genetic material in a population of wild salmon in southern Newfoundland. The discovery was of European genes in a population of salmon in southern Newfoundland. The scientists concluded that that genetic material could only have come from the recent use of European

salmon in an aquaculture facility, and the subsequent escape of those salmon and interbreeding of those salmon with the wild population. That, of course, would be an unauthorised use of European genetic strain in the industry.

That would be the second time that European genetics have been discovered in wild salmon in Canada. The first was here in the Bay of Fundy several years ago when European genetics were discovered in the gene-banking programme for the endangered inner Bay of Fundy salmon population. So, it seems we have a problem here in Canada with the unauthorised introduction and use of European strain salmon in the aquaculture industry. The development of a tool to identify that genetic material in wild populations will be useful, but obviously there's other questions.

In particular, what is Canada doing to identify the source of those fish? What is Canada doing to make sure those fish are not still in the water? What is Canada going to do to make sure those fish don't go into the water in the future? Is there any member of the Canadian delegation here who can shed some light on that situation. What's going to be done to make sure we don't continue to have those European strain fish in use in the aquaculture industry here in Canada?

Arnaud Peyronnet (President): Thank you, Steve.

Doug Bliss (Canada): so, thank you very much for the question from the Atlantic Salmon Federation. I think Livia Goodbrand might be able to help us out on that one.

Livia Goodbrand (Canada): thank you, Steve. Yes, we're aware of the report and we are tracking this file. There's actually a Canadian Science Advisory Secretariat (CSAS) meeting going on in parallel with the NASCO meeting, so they are deliberating on these very questions. And until we get that report finalised, I don't think we can really answer. That's the point of the CSAS process, and I trust that it is rigorous. I know that they've invited many different external participants, including international participants. So, unfortunately, we'll have to await the results of that review and report. Thank you.

Additional response received by correspondence from Canada 7 July 2023:

- *DFO is aware of the presence of European genes in wild and farmed salmon in Atlantic Canada.*
- *The use of reproductively-viable European salmon in net-pen aquaculture has never been permitted in Atlantic Canada, though some controlled work has been permitted in land-based facilities. It is expected that some European genetic presence has been unintentionally introduced into aquaculture, and European genes have been inadvertently released into the wild from farm escapes.*
- *DFO is working closely with provincial authorities and the industry to address this issue. We are reviewing several additional management measures. This includes stronger protocols and measures to reduce the risk of aquaculture salmon escaping and consideration of genetic screening approaches.*
- *DFO also continues to research mitigation measures to better protect wild Atlantic salmon. For example, DFO is working with provinces to review regulatory requirements of net pens to further mitigate escapes.*
- *Additionally, a DFO Canadian Science Advisory Secretariat (CSAS) process is currently underway, to assess the risk posed to wild Atlantic Salmon population abundance and diversity by direct genetic interaction with escapes from East*

Coast Atlantic Salmon aquaculture. This process will also consider potential mitigation options to address potential risks.

Arnaud Peyronnet (President): thank you, Canada.

Dave Meerburg (Atlantic Salmon Federation): Dave Meerberg, Atlantic Salmon Federation. I guess, Livia, I'd like to follow up on that, then. I find it a little bit surprising that DFO is saying they're holding off on doing anything about this until they get the result of a further scientific study on what the implications are of introgression into the wild populations. I believe what Steve asked, is that DFO seems to be aware there must be European-strain fish being used in the aquaculture industry, you've known that for a couple of years. Why aren't you out there looking at the industry and finding out where it came from?

It's got nothing to do with what answers are going to come from the scientific process, it's following up on what you should be looking at as a big concern. It's a concern of European strain fish in Canadian aquaculture that's not allowed by NASCO. So, it's a violation of NASCO's guidelines, and it should be followed up on, not put off to wait for some further scientific answer.

Livia Goodbrand (Canada): thank you. This is my understanding, and it may not be perfect. Part of the reason that they're meeting to discuss the science still, as opposed to taking action, is we don't really understand, based on the data we have, when and where those introgressions happened. Once those European genes get into the population, it's difficult to say what their source was or when that interaction occurred. So, I think part of the science that's left to be done is around increasing our understanding.

Yes, the European genes are there, we don't know if those are continuing to be added into the population's genetic structure, or if this was a problem that may have happened 10, 20 years ago. My understanding is that we need to find a resolution to understand when and how this happened, and if it's continuing to happen, before we can really determine how to move next. That's my understanding, but it really is imperfect and that's why I'm waiting on CSAS.

I just thought you'd have the process to go sample the industries, sample the smolts they're producing, sample the fish in the cages and see if you can find where they're coming from. I think it's a good idea, and I'm sure it's something that there's a lot of different ways to build a sampling programme. I expect that's something that's being worked on. Happy to take further questions or comments including if anybody from the Canadian delegation has a better understanding. Thank you.

Arnaud Peyronnet (President): thank you, Livia. Nigel, please?

Nigel Milner (Institute of Fisheries Management): thank you very much, Nigel Milner here from the NGO group. This is a question on behalf of the Norwegian salmon rivers, so I guess it's aimed to the Norwegian delegation. It's a bit of a hybrid question, because it also refers to NASCO generally. In the IP there's a statement that the Director of Fisheries will investigate episodes of strayed and farmed salmon in fjords and rivers, and where possible track fish back to the farm of origin and use that information to optimise control regimes. We would like to know if they feel, in their view, that the Norwegian Directorate of Fisheries has not carried out what they regard as a clear order from Government – to implement a common tracking system for all farmed salmon. This was set to be a priority in 2022, but the work has still not been done.

So, firstly, why hasn't that been done? That's to the Norwegian delegation. Secondly, to ask NASCO to stress to all relevant governments and their agencies the importance of complying with all agreed efforts to protect wild salmon. Thank you.

Arnaud Peyronnet (President): thank you, Nigel, and someone from Norwegian delegation?

Raoul Bierach (Norway): at this point I want to ask Guro Mathiesen, who's online, to comment on this question because she's an expert on it. Thank you.

Guro Mathiesen (Norway): thank you. Hi, I'm Guro Mathiesen from the Department of Trade, Industry and Fisheries in Norway, and we put great emphasis on reducing the challenges for escape incidences. Norway is positively inclined towards establishing a tracking system and providing a demonstration it is appropriate and efficient. Different methods are under evaluation in Norway, and the Directorate of Fisheries is currently considering where and how we may track the farmed salmon. So, that's where we are at this point in time, we're considering how we may track farmed salmon.

Arnaud Peyronnet (President): okay, thank you, thank you very much. Nigel, is that okay?

Nigel Milner (Institute of Fisheries Management): yes, thank you.

Arnaud Peyronnet (President): We have reached the end of the Session today; thank you again to the Review Group and to all the Parties for the questions.