



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

February 21, 2024

Kimberly Damon-Randall
President
North Atlantic Salmon Conservation Organization
11 Rutland Square
Edinburgh EH1 2AS
Scotland, UK

Dear Madam President:

Thank you for your letter regarding the status of the U.S. Implementation Plan (IP) for the Third Reporting Cycle (2019-2024). In your letter, you note that the U.S. IP remains deficient in the section related to Aquaculture, Introductions, Transfers, and Transgenics. Specifically, the IP Review Group concluded that the United States has not provided sufficient information or an acceptable action that demonstrates progress towards 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. As we stated in our January 4, 2023, letter to NASCO on this issue, the United States remains committed to NASCO's IP process and to meeting NASCO's goals with regard to sea lice. We also continue to maintain, as we reported to NASCO in a November 2020 letter, that the stringent monitoring, control, and enforcement regime for pathogens and sea lice in salmon aquaculture that we have in place is sufficient in meeting NASCO's goals for sea lice. That said, we are actively looking into ways to strengthen our program.

Since last year, and as we stated in our January 2023 letter to NASCO, we have been engaging with U.S. scientists to discuss a sea lice sampling regime and resource requirements needed to quantify sea lice loads on salmonids in areas with and without aquaculture. As an outcome, we were able to ascertain the human and financial resource demands that would be necessary to effectively carry out additional sea lice monitoring needed that we believe would satisfy the Review Group that we are meeting NASCO's sea lice goals. Although we recognize the severity of impacts that sea lice can have on wild salmonids, our evaluation of threats to Atlantic salmon in the Gulf of Maine¹ concluded that connectivity associated with dams and marine survival constitute the most severe, immediate threat to U.S. origin salmon, and hence, demand our most immediate attention. Given our ongoing stringent sea lice monitoring, control and enforcement regime, we have committed most of our limited resources towards addressing these most serious threats. These efforts include, among other things, removing dams; ensuring safe, timely, and effective passage through fishways; continuing to investigate the causes of low marine survival, both domestically and internationally; and continuing to negotiate for the lowest possible harvest of U.S. origin fish in interceptory mixed-stock fisheries. To effectively implement additional sea lice monitoring over and above our existing monitoring and control program will require

¹ U.S. Fish and Wildlife Service and NMFS. 2018. Recovery plan for the Gulf of Maine Distinct Population Segment of Atlantic salmon (*Salmo salar*). 74 pp.



additional human and financial resources to oversee the projects planning, management and implementation. These are resources that we, unfortunately, do not have at this time but will continue to seek.

We will keep NASCO informed of our progress to secure the resources needed to implement a new sea lice monitoring project. Although we will not likely be able to put forward any new or additional actions in this reporting cycle, we hope we will be able to do so in the next.

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