

CNL(26)24

Review of Draft Conservation Commitments Report

Date	Party / jurisdiction	Draft CCR – February 2026
February 2026	EU-Spain (Cantabria)	EU_Spain_Cantabria - Draft CCR submitted February 2026

Overview of Conservation Commitments Report

Overall Comments / Recommendations
<ul style="list-style-type: none"> • The Review Group recognizes efforts to improve upstream and downstream fish passage through barrier removal as a robust action that improves conditions for salmon survival and move towards the diminishment of the relevant stressors. • The Review Group noted that clarity is needed for many of the actions in respect to the measurable starting point and tangible outcome and how they relate to the milestones.

Consultation and Engagement

CCR reference	Review Question	Comments / Recommendations
E.1. E.2.	Are the questions in the ‘Consultation and Engagement’ section of the CCRs answered fully?	In part. The CCR document will be taken to the Regional Angling Council and published on the Citizen Participation Website. However, it is not clear how the stakeholders and IPRIs will be engaged in delivery of the CCR.

Stressors

CCR reference	Review Question	Comments / Recommendations
Stressor Justification	Are the top three stressors identified in the Party’s / jurisdiction’s stressor analysis used as the basis for the CCRs?	No. This question was not answered in the CCR, but see below.
	If not, are the justifications provided for the substitutions adequate?	No. The three stressors set out in the CCR are Climate Change, Barriers and Pollution. The figure presented at the NASCO Annual Meeting in June 2025 (CNL(25)29rev) shows these three

		stressors ranking high. However, Habitat Degradation appears to be one of the highest three stressors in the figure, possibly second highest, but Cantabria have not explained why this is not considered in the CCR.
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Stressor 1

CCR reference	Review Question	Comments / Recommendations		
S.1.a.	Are NASCO's theme areas identified?	Yes.		
S.1.b. S.1.c. S.1.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.1.1.d S.1.2.d S.1.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	No. The CCR recognises that the action will not reduce the stressor of Climate Change.		
S.1.1.c. S.1.2.c. S.1.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	In part. The starting point is a catch of 105 adult fish. However, there is no explanation why the starting point of 105 fish is much lower than the stressor baseline of 196 adult fish. Furthermore, the baseline and outcomes are presented in		

		numbers of catch (presumably adults), but the action appears to be stocking with juveniles.		
S.1.1.e. S.1.2.e. S.1.3.e.	Are clear interim goals / milestones identified for this action?	<p>In part.</p> <p>The annual milestones are catches of adult salmon, increasing from the starting point of 105 fish to 160 in 2032. However, the tangible outcome is specified as 110 salmon, which is the milestone for 2027 not 2032.</p> <p>During the interview process it was recognised that the milestones would need to be modified to account for the time lag between juvenile stocking and adult returns.</p>		
S.1.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>The baseline for the stressor is set as the estimated total annual catch of adult salmon in Cantabria during 2023-2024, which was 196 specimens. The tangible outcome for the stressor is “an increased number of catches” but without setting a number. However, the end goal of the action is 160 fish, which is less than the baseline for the stressor. The metrics need to be revised to be consistent.</p> <p>Furthermore, any change in the number of adult salmon could be influenced by a range of different factors so any change cannot be confidently attributed to the action, nor on indicating a reduction in the Climate Change stressor. For example, increased catches could be achieved by increasing fishing effort, or by changes in the wild adult abundance, without any effect of the action.</p>		

Comments / Recommendations

The stressor baseline should align with the action baseline.

The milestones should be modified to account for the time lag between juvenile stocking and adult returns.

It is unclear how variable fishing effort and other factors will be incorporated into evaluating the outcome if this action.

Stressor 2

CCR reference	Review Question	Comments / Recommendations		
S.2.a.	Are NASCO's theme areas identified?	Yes.		
S.2.b. S.2.c. S.2.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.2.1.d S.2.2.d S.2.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	Yes. Barrier removal and using new structures to reduce the effect of barriers, which I interpret as installing fish passes, should address the impact of barriers.		
S.2.1.c. S.2.2.c. S.2.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	In part. The defined starting point is 42 spawning areas, which we understand to be spawning redds or nests. But this number is different from the 143 defined as the baseline for the stressor.		

S.2.1.e. S.2.2.e. S.2.3.e.	Are clear interim goals / milestones identified for this action?	In part. The tangible outcome is set as 10 spawning areas, while the milestones increase from 42 to 64, which is an increase of 22. These metrics presumably need to be checked and revised.		
S.2.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>The tangible outcome of barrier removal is an expected increase in the number of spawning areas in the upper reaches. This is presumably assumed to lead to an overall increase in spawning areas within the optimum habitats, and therefore an increase in juvenile survival and production even if there are no additional spawning adults in the first years.</p> <p>The measures are set in spawning areas, but the action is on barrier removals and installing fish passes. Alternatively, a more direct measure could be the numbers of barriers removed, the numbers of salmon passes installed, or the amount of salmon spawning habitat accessed.</p> <p>Furthermore, if Stressor 1/Action 1 was successful in increasing the numbers of adult salmon, we could expect more spawning areas even without removing barriers if those barriers were only partially effective. This means it may be difficult to attribute progress to this action.</p>		

Comments / Recommendations

This action has the potential to have a significant impact on the Barriers stressor, but it is recommended that a clear baseline metric be developed to allow for tracking progress

Please clarify what you mean by spawning area, which we assume to mean the redd or next made by two or more spawning salmon, but could be a larger area.

If the action continues to use spawning areas as the metric, it should be explained why the starting point of 42 so much lower than the baseline of 143.

Stressor 3

CCR reference	Review Question	Comments / Recommendations
S.3.a.	Are NASCO's theme areas identified?	Yes.

S.3.b. S.3.c. S.3.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	In part.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.3.1.d S.3.2.d S.3.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	<p>In part.</p> <p>The tangible outcome is defined as 0.26 kg per 100m of juvenile biomass. However, the starting point is 1.74 and the milestone in 2032 is 2.6. It appears that the tangible outcome should be reported as 2.6 kg per 100m.</p> <p>However, neither the control and reduction of discharges, nor how these will affect pollution levels in rivers or juvenile abundance are not well explained. Therefore, it will be very difficult to relate changes in juvenile abundance to progress in delivering this action.</p>		
S.3.1.c. S.3.2.c. S.3.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	<p>In part.</p> <p>The starting point is juvenile abundance of 1.74 kg per 100 m. But the baseline for 2024 was 1.09 kg per 100 m.</p>		
S.3.1.e. S.3.2.e.	Are clear interim goals / milestones identified for this action?	In part.		

S.3.3.e.		Milestones of increasing abundance are set from 1.74 to 2.6 kg per 100 m.		
S.3.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>The quantitative baseline is the average juvenile biomass in surveys as kg per 100 m. The tangible outcome is described as an improvement of water quality leading to an increase in the salmon population and therefore an increase in juvenile biomass.</p> <p>However, there is no detail of the distribution and impact of pollution, or how it affects juvenile abundance. Also, abundance is first influenced by spawner abundance so the actions on other stressors could increase adult abundance that and hence juvenile abundance without any effective action on pollution.</p>		
<p>Comments / Recommendations</p> <p>This action describes a human coordinating activity associated with salmon conservation, but the benefit to salmon from this specific action is not being measured. It is recommended that a clear baseline metric for river pollution be established to track progress.</p> <p>If the metric of juvenile abundance is continued in the final CCR, the baseline, milestones and outcome should align as the beginning, middle and end values.</p> <p>If the metric of juvenile abundance is continued in the final CCR, it should be explained why the starting point of 1.74 kg is higher than the 1.09 kg of 2024.</p> <p>If the metric of juvenile abundance is continued in the final CCR, it should explain how the variable spawner abundance and other factors will be incorporated into evaluating the outcome of this action.</p> <p>This is a continuation of existing efforts as no new actions are proposed.</p>				