

CNL(26)26

Review of Draft Conservation Commitments Report

Date	Party / jurisdiction	Draft CCR – February 2026
February 2026	EU-Spain (Gipuzkoa)	EU_Spain_Gipuzkoa - Draft CCR submitted February 2026

Overview of Conservation Commitments Report

Overall Comments / Recommendations
<ul style="list-style-type: none"> • Efforts to improve upstream and downstream fish passage at dams, and plans to plant 30 hectares of riparian buffer to improve habitat are ambitious actions that improve conditions for salmon survival and move towards the diminishment of the relevant stressors. • Although many of the actions will promote and support restoration of habitats important to salmon or minimize harm to salmon the direct benefits to salmon are not being measured. Measures of improved survival, productivity and/or distribution would enhance understanding of the benefits to salmon.

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?	Yes.

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.
	If not, are the justifications provided for the substitutions adequate?	Yes.

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)?	Yes. Improvements of fish passes to facilitate the upstream of salmon and therefore access to the upper areas of the basin.	Yes. Fish deterrents at canal entrances are tailored to each site with the aim to improve survival rate in downstream migration.	
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?	Yes.	Yes. 10 HPPs are present	
S.1.1.e. S.1.2.e. S.1.3.e.	Are clear interim goals / milestones identified for this action?	Yes.	Yes. The aim is to prevent smolts and kelts from entering the canals in 2 HPPs.	
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?	Yes.		

Comments / Recommendations

The removal of obstacles and prevention of smolts and kelts to enter HHPs will clearly benefit the Atlantic salmon. However, the action does not include plans of direct measure on the upstream passage success or downstream survival. Such measures would enable assessment of the success of the 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. But the potential for improvement is moderate. Affects on water temperature will only be seen in the long term.	Yes. But the potential for improvement is reported to be small, as most weirs have already been removed.	
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?	Yes. No vegetation.	No. Although most weirs have been removed, it can be helpful to list weirs that are still present.	
S.2.1.e. S.2.2.e. S.2.3.e.	Are clear interim goals / milestones identified for this action?	In part. The plan is for the overall restoration of riparian vegetation of 30 hectares	Yes.	

		alongside rivers. There is a plan for each year, but specifying which sites will be focused on would be helpful.			
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?	Yes. Overall goal is for riparian vegetation to be restored at 30 hectares alongside rivers and involves the removal of two dams.			
Comments / Recommendations					
The actions appear sound; some work could be done to establish clearer milestones and baselines to enable progress to be tracked.					

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. The actual impact of flow regulation on salmon populations is reported to be unknown.		
	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)?	No. Monitoring of flow rate as such will not affect salmon survival, although the information on water regulation can indeed be used to identify potential risk.		
S.3.1.c. S.3.2.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	No.		

S.3.3.c.				
S.3.1.e. S.3.2.e. S.3.3.e.	Are clear interim goals / milestones identified for this action?	No.		
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?	No. Baseline is not clear.		
Comments / Recommendations				
This action requires additional work to support an effective evaluation against the criteria outlined in the Terms of Reference for the Review Group.				