



10/06/2011

To SAD Steering Committee,

The Salmon & Trout Association (S&TA) welcomes the opportunity to comment on the draft Salmon Aquaculture Dialogue standards

The S&TA was established in 1903 to address the damage done to our rivers by the polluting effects of the Industrial Revolution. For 107 years, the S&TA has worked to protect fisheries, fish stocks and the wider aquatic environment on behalf of game angling and fisheries. In 2008 it was granted charitable status. S&TA's charitable objectives empower it to address all issues affecting fish and the aquatic environment, supported by strong scientific evidence from its scientific network. Its charitable status also enables it to take the widest possible remit in protecting salmonid fish stocks, and the aquatic environment upon which they depend.

General comments

We remain very disappointed that the current standards do not champion closed containment, which we feel is the only effective way to mitigate the majority of the risks posed by salmon farming to wild salmonids. In order to move towards sustainable salmon farming, the standards must encourage the industry to invest in closed containment. We feel the standards must make greater reference to continuous improvement in this direction.

We support the draft standards' proposal that smolts raised in open net pens in wild salmonid systems are ineligible for certification, due to risk of genetic dilution, the spread of diseases and parasites, and the risk of pollution of the surrounding environment.

Comments on Principle 3

There is still also no indication on how the information applicants are required to collect and monitor as part of the certification will be audited, and then fed back into the process to drive improving standards. This is fundamental and needs to be addressed. There is also still excessive use of the word 'should', which has no way of being assessed and therefore has no place in an audited standard.

In relation to the auditing and assessment for eligibility or compliance process; we think it is impossible to comment fully on the standards presented in this document in the absence of detailed guidelines for auditors, and information on how these will be applied to the standards.

In addition, there are numerous parasites other than sea lice that infect farmed salmon and are transferable to other fish (e.g. *Gyrodactylus salaris*, *Parvicapsula*, microsporidians, etc). It may be beneficial to add a standard that is more specific to pathogen management, rather than just referring and relying on an "area-based management scheme" that only loosely touches on the issue.

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3.1.1. Participation in an effective area-based scheme for managing disease and resistance to treatments. This includes production levels, coordinated application of treatments, rotation of different treatments, open communication about treatment, monitoring schemes, stocking and transport.

We support the principles of area based management schemes, but stress that in order to manage the cumulative impact of salmon farms the process, these schemes must be entirely transparent, with data sharing and communication between fish farms and all other stakeholders, including wild fish interests. All data must be in its 'raw' form and made available easily and quickly to anyone who wants to see it.

3.1.4. Weekly on farm testing for sea lice, with test results made easily publicly available within 7 days of testing.

We support this principle, but would reiterate that it must be made clear in the document that this data, and any other data, must be in its 'raw' form and not already analysed/amalgamated/sanitised in any way.

3.1.5 In areas with wild salmonids, evidence of data, and the farms understanding of the data, around salmonid migration routes, migration timing and stock productivity in major waterways within 50 km of the farm.

In the rationale, it states farms do not need to conduct research on migration routes, timing and health of wild stocks, but must 'demonstrate' an understanding. It is not clear what 'demonstrate' means. It is not clear what happens in the many areas where this information does not exist. This is not clear in the guidance. If the industry needs to fund research in order to answer these questions in order to be eligible for the certification this must be made clear. Also, the guidelines on how the research should be conducted need to be consulted upon. Certainly, any monitoring protocol must be so designed not to damage already vulnerable native wild salmonid stocks.

3.1.7. In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish; Option A (0.1 mature female lice per farmed fish), or Option B (0.1 mature female lice per farmed fish but only if monitoring of lice levels in wild populations exceeds a certain threshold).

We are very concerned that this indicator does not address the key concern here which is infection pressure. 0.1 lice per fish on large farm, or during juvenile migration timeframe may still not adequate to protect wild fish. The size of the farm is critical in deciding whether or not too many juvenile lice are being produced by the farm.

We would like to remind the Steering Committee of the international goal set by NASCO, which many of our countries have signed up to - '100% of farms to have effective sea lice management such that there is no increase in sea lice loads or lice induced mortality of wild salmonids attributable to the farm'. We do not feel that as it stands this international goal can be delivered by this standard. Fundamentally we feel that where it is not practical given the proximity of sensitive wild salmonid fish or migration runs to existing farms, the standard must require the farm to be relocated or change production to closed containment before it can be considered in the process.

Criterion 3.2 Introduction of non-native species

We believe farms with non-native species should only be certified if farmed in enclosed systems, where they cannot impact native wildlife.

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Criterion 3.3 Introduction of transgenic species

We support the ban on use of transgenic fish because of the unknown impact on wild populations.

Criterion 3.4 Escapes

We are concerned that the escapes section is not precautionary enough to protect all wild salmonids. The escapement of up to 300 fish, allowed in one production cycle, could be catastrophic to some already small/degraded wild salmon populations, such as those on the west coast of Scotland.

Finally, with regard to the use of the various sea-lice treatments, we think it would be sensible, even at this late date, to propose a new standard (5.3.3) which should require farms to report, on a publicly-available database, within 7 days of the event, any lack of efficacy or suspected resistance in any sea-lice treatments. The purpose of this is twofold; it would alert wild fish interests that sea-lice treatments are failing in a particular area and that wild fish may be unusually at risk, and it would also allow neighbouring farmers and those in the next areas along the coast to consider their selection of sea-lice treatments more carefully.

We question whether these standards have the ability to actually result in a tangible, positive impact on the ground. We also remain very concerned that the standards will damage our work in the future fight for more environmentally sustainable salmon aquaculture and a move towards closed containment, because they will give the general public the perception that 'environmentally sustainable' aquaculture already exists through this standard, which we all know is NOT the case.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Knight', is written over a light blue circular background.

Paul Knight

Chief Executive

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