

## **Information on Aquaculture Stewardship Council certification from Fisheries Management Scotland**

Fisheries Management Scotland would like to offer some further short comments with regard to the Aquaculture Stewardship Council certification process. As we stated in our original response, and in committee on 14th March, we consider the ASC certification scheme to be a very positive development and we are very encouraged that the Committee has corresponded directly with ASC as part of the inquiry.

ASC certification has formed the basis of discussions facilitated by the International Sustainability Unit, and including Fisheries Management Scotland, Atlantic Salmon Trust, Marine Harvest, SSPO, Marine Scotland, Aquaculture Stewardship Council and Sainsburys. We are committed to working with the industry, and regulators with a view to making meaningful progress for the benefit of wild fish and fisheries. We consider that ASC certification is the only current standard which has the potential to adequately address wild-farmed interactions. Global GAP was also mentioned in committee, but this standard does not appear to specifically attempt to address wild-farmed interactions issues.

We welcome the commitment by Marine Harvest, at the REC Committee on 2 May, to gain ASC certification for all its farms in Scotland. Gaining and maintaining ASC certification will necessarily involve significant engagement, information sharing and joint working with local wild fish interests, and we believe that this has the potential to be an extremely positive development. We note that this will require the publication of sea lice data within 7 days of collection on a farm-by-farm basis. It would also require an area sea lice threshold for each farm management area in which Marine Harvest operates in addition to lice per fish targets and collaborative work to monitor and measure possible impacts on wild stocks, with a feedback to farm management.

One outstanding area of concern remains freshwater smolt production. As discussed in committee on 2 May, ASC are currently consulting on relaxing the prohibition of the production of smolts in open cages in freshwater. It is our understanding that there will be a further round of consultation before a final decision is made on this potential change. Whilst this change is partly due to the nutrient status of freshwater lochs and lakes, as discussed in committee, the rationale set out on page 69 of version 1.1 of the ASC Salmon Standard makes clear that impacts on wild fish populations are a major consideration:

Impacts of concern include the effect of escapees on wild fish populations, nutrient loading, disease transmission, and antibiotics and chemicals entering the freshwater environment. The vast majority of salmon smolt production takes places in closed or semi-closed systems where these impacts can be significantly reduced in a way that is not possible in fully open systems, such as net pens.

The introduction and amplification of parasites and pathogens, and the potential genetic effects of escapees, have been raised as particularly concerning in areas where native salmonids exist. For this reason, the ASC Salmon Standard allows only closed or semi-closed smolt systems to be certified in areas of wild salmonids.

We note that this rationale has not yet been altered as part of the proposed changes to the salmon standard. However, in recognition of the potential impacts on wild fish, the ASC have proposed a number of changes to the standards for farming in freshwater. These proposed changes (which would also encompass trout farming) include:

- A genetic baseline must be established for local wild salmon and this should be monitored appropriately to demonstrably ensure there is no (further) introgression;
- Appropriate monitoring of wild salmon stocks must be undertaken in collaboration with the local wild fishery organization(s);
- Ongoing wild salmon sampling must be undertaken to confirm that any introgression detected is historic;
- Underwater cameras must be used during feeding periods to minimise the risk of waste feed from the pens;
- Farms must have a minimum fallow period of 8 weeks;
- Farms must develop and implement a Containment Plan with the focus to minimize the risk of fish escape events.

As we stated in our original submission we are very concerned about the sustainability of production of smolts in open cages in freshwater (where significant unreported escapes still occur). However, should this practice continue in Scotland, we consider that the additional requirements set out above would be a positive development. On that basis, we are working collaboratively with Marine Harvest to collect samples to establish a genetic baseline, and design ongoing monitoring strategies during 2018, in anticipation of any changes to the ASC standards. Ultimately, if open cage farming of smolts in freshwater lochs is to be permitted in future, we are of the view that the principles outlined above should be the minimum standards that should be met as part of a reformed regulatory system. We are also working with ASC to ensure that further safeguards for wild fish are incorporated in any updated standard. We would also like to see urgent research on other potential impacts: the possibility that the presence of farmed juveniles in migratory systems may interrupt the olfactory cues used by wild returning adults in the last stages of migration; and the relationship between freshwater cage production and migratory behaviour of brown trout/ sea trout.