



Evidence from NASCO's accredited NGO Observers to The External Performance Review Group 2022

The North Atlantic Salmon Conservation Organisation ([NASCO](#)) regularly undertakes an external review of its performance every few years. A review is currently underway, and NASCO's accredited NGOs have been invited to provide evidence to the External Performance Review group.

This is the submission of the NGO observers to the review group, submitted on 13 July 2022:-

NASCO's accredited NGOs welcome the opportunity to provide evidence to support the work of the External Performance Review (EPR) group. We do so at a time of growing crisis for wild Atlantic salmon, with some stocks facing extinction and emerging new threats to an already vulnerable species. This third EPR is therefore timely and vitally important if NASCO is to help conserve and restore this important fish species, as its remit requires. Decisive action is urgently required if NASCO is to become relevant to modern salmon management and conservation

NASCO is unique in facilitating significant NGO involvement, a relationship which gives the forum credibility in the wider salmon conservation world and must be retained and strengthened in future. The NGOs recognise the value of an effective international forum and in turn have added significantly to NASCO's work. The NASCO NGOs remain a strong and united voice for salmon conservation, speaking for over forty organisations from across the North Atlantic region. However, we are increasingly frustrated by the failure of NASCO Parties to abide by the international obligations of the forum and to achieving its objectives, which membership of the organisation requires.

NASCO has successfully overseen a reduction in the salmon fisheries at Greenland and the Faroe Islands through the implementation of regulatory measures. Greenland has gradually improved management of its salmon fishery and the Faroese have not issued salmon licenses since 2000. Together with private compensation paid to fishermen and commitment from the Greenland and Faroese governments, NASCO must take credit for progress so far. The result has been that feeding ground exploitation is no longer the greatest threat to wild salmon, although by-catch in oceanic and coastal fisheries is still a significant issue needing urgent action.

The current Convention recognises that salmon conservation requires wide ranging actions in both fresh and marine environments. Accordingly, NASCO has provided a valuable international forum for exchange of scientific information and best management practices, and it should continue and strengthen this role with the full involvement of the NGO scientific community. Sound science has supported the development and adoption by NASCO of

international Resolutions, Agreements and Guidelines on a range of issues including aquaculture, fisheries management, and habitat restoration. The previous performance reviews commended NASCO for these agreements and the international goals they contain, which would greatly benefit wild Atlantic salmon conservation if they were adhered to by the governments represented in the forum.

NASCO is unique amongst RFMOs in being conservation-based, but the NGOs are increasingly frustrated by the apathy of Parties towards this vital conservation objective. Greenland and the Faroe Islands have made sacrifices in their historic fisheries to save salmon, but fairness and balance across all members of the forum were central themes of the previous two EPRs and the NGOs believe that other NASCO Parties have not lived up to their conservation responsibilities. We therefore have deep reservations about the forum's ability to achieve its international goals under its current Convention, because participating governments can ignore NASCO's Resolutions and Guidelines if it suits them, without penalty. Instead, their support is regularly shown to activities that have the potential to damage wild Atlantic salmon stocks.

When establishing regulatory measures, NASCO's Convention requires that Parties consider a range of factors that include, '*the efforts of States of origin to implement and enforce measures for the conservation, restoration, enhancement and rational management of salmon stocks in their rivers and areas of fisheries jurisdiction...*'. In response to the first performance review, which highlighted a lack of commitment to these agreements, and at the request of Greenland and the Faroe Islands, it was agreed that Implementation Plans (IPs) should be developed to document actions being taken to achieve NASCO's international goals. Progress on IP actions would be reported through Annual Progress Reports (APRs) and both IPs and APRs would be critically reviewed by a specialist working group. The first IPs were developed in 2007, but the second EPR in 2012 found little progress had been made and reported the following:

Because the Convention does not adequately reflect current applicable law and practice (in view of the changed circumstances since its adoption), it should be reviewed with a view to strengthening and modernizing the legal mandate of NASCO and the obligations of the Parties. In parallel, or as an alternative, other options should be considered for strengthening and modernization, such as agreement on a legally binding protocol.

Rather than changing its Convention, NASCO agreed in 2013 to strengthen the IP/APR process, reaffirming the need for Parties to increase their commitment to wild salmon conservation by showing progress towards achieving NASCO's international goals. However, in 2022, the current (third) IP cycle only highlights how little progress has been made over the past decade, while the crisis facing wild salmon has deepened. Currently only 4 out of 21 IPs have been accepted by the IP/APR Review Group, despite revision advice from the Group and improvements urged in writing to relevant Parties by NASCO's President. This is a major frustration for the NGOs and the wider salmon world.

The IP/APR process is basically sound but has serious flaws in the way Parties treat it:

- Many actions identified in the IPs pay no regard to NASCO's international goals
- Many APRs are vague and provide little information to demonstrate progress or commitment to achieving NASCO's international goals
- Several NGOs report a lack of connection between what is stated in IPs/APRs and what is delivered on the ground

- The Review Group lacks teeth and often it is only the NGOs that challenge Parties during Council IP and APR special sessions
- Several Parties complain that the process is too time and resource consuming

In other words, the system designed to strengthen the commitment of NASCO's participating governments to wild salmon conservation has clearly failed.

There is often sufficient legislation laid down by NASCO's participating governments to protect wild salmon, but the lack of legislative enforcement means that the species continues to suffer. Intensive agriculture, hydroelectric systems and the many forms of water pollution are all highly damaging to the different life stages of Atlantic salmon. However, the most frustrating issue is the lack of regulation across the north Atlantic region for open pen salmon farming, whose impacts include disease and parasitic sea lice transfer to wild fish, seabed pollution, and the dilution of natural gene pools by the interbreeding of escaped farmed and wild salmon. Salmon farming governments generally ignore these dangers and the need for closed contained units which create a physical barrier between farmed and wild fish, and instead they support the cheaper option of open pen production, mainly through a reluctance to regulate the industry sufficiently. This means that, for example, maximum sea lice numbers - where they have been implemented - are permitted to be regularly exceeded, allowing the parasites to transfer to wild salmon smolts and eat them alive as they migrate past open pen farms.

The parties must therefore recognise that on matters which are now the top priorities for salmon conservation, NASCO has no binding mandate and very little control or influence over the policies of participating governments, especially where ignoring its Resolutions and Guidelines suits individual political interests. Consequently, the necessary measures do not get enacted and the crisis for wild salmon continues to deepen.

Now that the key threats to wild salmon occur primarily in home waters, mandate strengthening is necessary to ensure NASCO Parties tackle these priority issues with the same level of attention and urgency they showed over exploitation at Greenland and the Faroe Islands. While this might be time consuming and politically contentious, forging clear legal requirements and processes is critical to international salmon conservation and would bring NASCO into line with other Regional Fisheries Management Organisations (RFMOs) who have amended their original agreements in recent years.

NASCO must strengthen its convention, otherwise it will lose credibility and relevance in the modern wild salmon conservation world. Parties must therefore:

- **pledge, under a legally binding agreement, to adhere to a revised IP/APR process which produces hard, precise and measurable actions that move all Parties towards achieving NASCO's international goals**
- **include compliance and dispute resolution mechanisms in the Convention so it becomes evident to Parties/jurisdictions that the advantages of compliance with NASCO's international goals outweigh the benefits of noncompliance**

- **within their IPs/APRs, ensure succinct, clear and transparent provision of/reporting on actions that directly address current issues adversely impacting wild salmon stocks in home waters - including open pen salmon farming, exploitation, freshwater habitat restoration, climate change impact etc**
- **legally mandate the adoption of key international sustainability principles and objectives (e.g., precautionary and ecosystem approaches) – rather than allowing participating governments to ignore these when it suits them – eg as Chatham House recommended in 2007, *Because there will always be a degree of uncertainty in fishery resource management, RFMOs should ensure that the precautionary approach is an integral part of their convention***

Failure to strengthen the Convention would send a strong message to Greenland and the Faroe Islands that other NASCO Parties reject any increased pressure on them to address their own impacts on wild salmon in home waters. **This lack of balance and political commitment within NASCO Parties would put future agreements at Greenland and The Faroe Islands at risk.** Fairness and balance are therefore critical to the forum's future success, and the NGOs believe these basic tenets should form the basis of a renewed and strengthened mandate for NASCO Parties

In summary, NASCO must radically strengthen its 40-year-old Convention if it is to become an influential forum for modern international wild salmon conservation. At present, NASCO has no mandate to hold its participating governments accountable if they fail to adopt actions capable of delivering its international goals, and this must change if the forum is to become credible and relevant in the wider salmon conservation world. The NGOs' major recommendation is that legal and procedural changes are urgently embraced so that NASCO becomes a more rigorous, accountable and enforceable forum, with its participating governments legally bound into providing policies that create properly regulated actions clearly aimed at conserving wild Atlantic salmon.

The list of organisations that supported this submission is appended below.

The accredited nongovernment organisations that supported this submission to NASCO's External Performance Review Group:-

[Angling Council of Ireland](#)

[The Angling Trust](#)

[Association de Défense des Ressources Marines](#)

[Association Internationale de Défense du Saumon Atlantique](#)

[Atlantic Salmon Conservation Foundation](#)

[Atlantic Salmon Conservation Schools Network](#)

[Atlantic Salmon Federation, Canada](#)

[Atlantic Salmon Federation, USA](#)

[Atlantic Salmon Trust](#)

[Coalition Clean Baltic](#)

[College of the Atlantic](#)

[Connecticut River Salmon Association](#)

[Conservatoire National du Saumon Sauvage](#)

[Coomhola Salmon Trust Ltd](#)

[Der Atlantische Lachs](#)

[Downeast Salmon Federation](#)

[European Anglers Alliance](#)

[Faroes Sportsfishing Association](#)

[Federation of Irish Salmon and Sea-Trout Anglers](#)

[Fédération Québécoise pour le Saumon Atlantique](#)

[Fisheries Management Scotland](#)

[Foyle Association of Salmon and Trout Anglers](#)

[Institute of Fisheries Management](#)

[Irish Seal Sanctuary](#)

[Marine and Environmental Law Institute](#)

[National Anglers Representative Association](#)

[Norges Bondelag](#) (Norwegian Farmers Union)

[Norges Jeger og Fiskerforbund](#) (Norwegian Association of Hunters and Anglers)

[Norske Lakseelver](#) (Norwegian Salmon Rivers)

[North Atlantic Salmon Fund Iceland](#)

[North Atlantic Salmon Fund US](#)

[Salmon Net Fishing Association of Scotland](#)

[Salmon and Sea Trout Recreational Anglers of Ireland \(SSTRAI\)](#)

[Salmon and Trout Conservation UK](#)

[Salmon and Trout Conservation Scotland](#)

[Salmon Watch Ireland](#)

[Sami Parlamenta \(Finland\)](#)

[Sami Parlamenta \(Norway\)](#)

[Tanavassdragets fiskeforvaltning](#)

[Ulster Angling Federation Limited](#)

[WWF \(France\)](#)

[World Wide Fund for Nature \(Norway\)](#)

[WWF \(Russia\)](#)

[World Wildlife Fund \(US\)](#)