

Public Comments Received on Revised Draft Criteria for the Salmon Aquaculture Dialogue

Below are the comments received via the website during the second public comment period on the draft criteria, which ran from February 13, 2009 to March 6, 2009. Comments are included below unedited and in their entirety. The Steering Committee of the salmon Dialogue reviewed and discussed these comments, using them in conjunction with feedback collected at an open Dialogue meeting in March 2009 to revise the criteria.

Comments submitted by Dawn Purchase, Marine Conservation Society, Feb 26, 2009

Limited comments below:

Principle 2.

Is visual impact considered here under siting or under Principle 7.

Principle 4.

4.6 Does the word inputs include antifoulants? If not suggest using "inputs/treatments"

The standards are a useful tool for monitoring and driving continuous improvement in salmon production, however I do not see a requirement for an Environmental Management System or any other method to capture key indicators on which to build a programme of continued performance improvement.

Is there any driver or incentive for farms to take part in innovative commercial trials for new equipment and methods?

Comments submitted by Henry Clifford, Aqua Bounty Technologies, March 3, 2009:

This is about Criteria 3.2 (Introduction of transgenic species). There is only one species/line of transgenic salmon in existence, and so this Criteria was clearly drafted to specifically "address" this unique animal. My comments are perhaps more appropriate in a discussion of Standards for this Criteria, but I wish to preemptively engage the SAD to address this topic in a responsible dialogue. Without a doubt, the "irresponsible" introduction of transgenic salmon must be deterred. But PLEASE remember that there are RESPONSIBLE ways to introduce transgenic salmon into aquaculture systems; deploy only sterile animals, deploy single sex populations, do not deploy them in sea cage systems but instead deploy them in land based, contained (e.g. recirc) systems.

Comments submitted by Lise Bergan, Cermaq ASA, March 5, 2009:

Please find the following comments to the draft principles and criteria from the Salmon Aquaculture Dialogue.

In the Edinburgh meeting there was discussions, around including positive effect of salmon farming in the principles and criteria. We support that this is not a part of the criteria. However, it would be natural to emphasize the importance of efficient and sustainable salmon farming to supply the growing population with highly nutritious food as well as providing job opportunities in rural areas.

Before commenting the criteria we would like to draw attention to Principles 1 and 2 as the wording is reaching farther than can be sustained by the criteria and practice.

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In Principle 1 local, national and international legal requirements and regulations are mentioned equally. We understand this that international legal requirements and regulations apply to the extent that these legal requirements or regulations have been adopted by the national authorities and thus integrated into national regulation.

In Principle 2 the text could be read as the salmon farming has responsibility to conserve the environment beyond the effects of the salmon farming. We believe that the scope of the principles and criteria should be limited to effects of the salmon farming.

If our understanding of these principles is not in line with how the text is meant to be understood we believe these principles will not be suitable for implementation.

Criteria 4.6 say non-therapeutic chemical input. We read this as copper, but are uncertain what the intended scope is. In principle the text is extremely wide.

Criteria 5.3: Reword to "Therapeutic treatments" corresponds with wording in criteria 4.6

Criteria 5.1 to 5.15 could be added with criteria on the use of preventive measure (functional feed, vaccines etc)

Criteria 5.4: This is unlikely to be the responsibility of the individual farm/company, but more likely the summed effect over the industry.

Criteria 5.5: What is meant by hygiene? Hygiene normally applies to the food side - once the fish are dead. Biosecurity should cover this. What exactly will be left out if the words "and hygiene" are deleted?

Based on the discussions in Edinburgh we are surprised that animal welfare is not reflected in the criteria.

Comment submitted by Patrick Armstrong , Moresby Consulting Ltd., Feb 14, 2009:

It is difficult to comment on the "draft standards" from a distance and without the benefit of hearing the dialogue that led to both the framing of the draft and choice of language and approach to drafting principles and criteria. As a result I won't address specifics, but have two high level observations:

1) At a global level the drafting of principles and criteria do not constitute a "standard" for the purpose of certification nor should they. The global principles and criteria (P&C) should be used to guide the development of certification standards at a regional scale where relevant and appropriate indicators can be developed. Large scale salmon aquaculture is being practiced in a half dozen or more regions of the world representing a considerable diversity of social, political, economic and ecological conditions, ergo the requirement for regional certification standards.

2) Notwithstanding the comment above P&C need to be carefully and clearly written, without being prescriptive, to be of value to regional standards writing groups. For instance criterion 2.1 Benthic biodiversity and benthic effects needs to be written in a way that provides guidance for standards writers who need to draft qualitative

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indicators that are useful for the purpose of auditing. Criterion 2.1 could read: Management of the farm includes measures to reduce benthic impacts associated with the operation as a means of supporting the maintenance of benthic biodiversity.

This would provide standards writers with strong guidance as to the intent and provide a platform for drafting qualitative indicators (i.e., describe the regionally appropriate management actions such as baseline data gathering, monitoring, fallowing, etc.). Also written this way the criterion explicitly recognizes that not all benthic impacts and changes to benthic biodiversity result from farm operations.

Thank you for the opportunity to comment and I hope this is helpful.

Comment submitted by John F. Robins, Animal Concern and Save Our Seals Fund, Mar 6, 2009:

I am very disappointed that the Steering Committee decided to continue to exclude Fish Welfare from the Dialogue Standards. There was a great deal of support for including Fish Welfare at the Edinburgh Meeting.

In the UK at least any industry code for rearing farmed salmon will be of little value to consumers if it does not define minimum standards for the welfare of farmed salmon.

There has already been a lot of work carried out into the welfare of farmed fin fish. In the UK Compassion in World Farming has published reports on the subject and in the USA the HSUS has published research on the welfare of farmed fin fish and on pain perception in fish. The world renowned Institute of Aquaculture at the University of Stirling has also produced relevant material on fish welfare.

I think the SAD will do the salmon farming industry a great disservice if it produces industry standards which do not address the question of the welfare of salmon in salmon farms. I urge delegates at the Boston meeting to revisit this question as I believe it is crucial to the validity of the SAD initiative. A set of aquacultural standards which does not include a standard for the welfare of the animals reared on the farms is about as much use as a wellboat without a rudder it will make a lot of noise but it will not do what you want it to do or go where you want it to go.

Comment submitted by Phil Brooke, Compassion in World Farming, Mar 9, 2009:

Compassion in World Farming urges the Worldwide Fund for Nature to resolve to include animal welfare standards in its plans to certify salmon or other fish species. This could be achieved either by developing standards with appropriate animal welfare experts or through planning to partner with other credible animal welfare schemes, for example with the RSPCA in the case of salmon.

Animal welfare should be seen as a core part of sustainability. There must be considerable risk to the credibility of this scheme, and to the good name of the Worldwide Fund for Nature, if it has later been proved to certify fish that have been produced under conditions of poor welfare.

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