



Fisheries Management Scotland position on recent changes to ASC standards

In September, the Aquaculture Stewardship Council (ASC) published an update to their Salmon Standard, which includes a significant revision to Principle 3, and the indicators concerning sea lice management. ASC's stated aim of Principle 3 of the Salmon Standard has always been "to ensure that salmon farms do not harm the health of wild fish populations". No part of the revision meets ASC's intention to protect wild fish.

In the previous version of the Salmon Standard, ASC defined a maximum on-farm lice level during sensitive periods for wild fish as 0.1 mature female lice per farmed fish for ASC farms in areas of wild salmonids. This threshold was set based on the Sea Lice Technical Report written by the Salmon Aquaculture Dialogue which concluded that a "concerted precautionary approach" was required to effectively manage the issue.

ASC's revised approach represents a fivefold increase in the permissible threshold of lice per farmed fish and considerably lowers the bar for farms to achieve or maintain certification in Scotland. Earlier in the revision process, ASC proposed that sea lice thresholds should be based on regional regulation. As Scotland does not currently have a regulatory standard for sea lice which protects wild fish, ASC farms in Scotland would have been expected to adopt the most stringent international standard in place at the time (currently 0.2 adult female lice per fish in Norway). However, ASC instead took the decision to apply the "lowest sea lice limits established in the different regions". For Scotland, this equates to the Code of Good Practice, an industry-led voluntary certification scheme with a threshold of 0.5 adult female lice per farmed fish from February to June. Using the Code of Good Practice as a mechanism for assessing ASC farms in Scotland is inappropriate as it is far from the highest international standard, and cannot be justified as protecting wild fish.

ASC will allow farms 21 days to reduce sea lice levels back under the threshold. However, there will also be an option for farms to apply for an exemption in cases where a veterinarian or fish health professional exempts fish from treatment, allowing farms a period of 14 days to reduce lice levels below the threshold from the first day that treatment is possible. The rationale stated behind this threshold in the revised Salmon Standard still points to the need for a "concerted precautionary approach" to protect wild fish from sea lice but it is clear that this is no longer the case.

This most recent change follows an earlier dilution of the protections for wild fish associated with ASC certification. In 2019 farming of salmon smolts in freshwater open-net pens with native salmonids was permitted under the ASC Freshwater Trout Standard. This practice was previously prohibited under the standard with the following rationale "*Impacts of concern include the effect of escapees on wild fish populations, nutrient loading, disease transmission, and antibiotics and chemicals entering the freshwater environment.*"

Aquaculture Stewardship Council Certification was the only aquaculture certification scheme that attempted to include provisions for the protection of wild salmonids, and this is the reason that [Fisheries Management Scotland] saw merit in engaging with this scheme. If ASC wishes to be an industry leading certification standard, then it should be setting stringent requirements which go beyond regulation, and beyond similar certification schemes. ASC has not presented any evidence to suggest that these revised changes will deliver on either of these intentions.

Fisheries Management Scotland and our members have invested time and effort in engaging with the ASC process, either directly with ASC, or by providing stakeholder input to individual farm assessments. Over the

last two years, Fisheries Management Scotland have made several representations to ASC stating our fundamental opposition to this revised sea lice approach. It is disappointing and frustrating to see ASC approve this latest revision as it fundamentally undermines the integrity of the ASC scheme.

Fisheries Management Scotland do not see ASC certification as a credible form of protecting wild fish.