

01<sup>st</sup> February 2023

Dear Mr Chris Nines,

I'm contacting you to express Compassion in World Farming International's (CIWFI) concern regarding the Aquaculture Stewardship Council's (ASC) revised Salmon Standard, specifically about the new requirements of the Sea Lice indicator 3.1.7., which comes into effect on 1<sup>st</sup> February 2023.

Farmed salmon health and welfare is hugely affected by sea lice parasites and wild salmon can also experience severe problems which can ultimately lead to increased mortality and population declines<sup>1,2</sup>. Therefore, the protocols in place to control parasite infections are crucial in determining the welfare of hundreds of millions of salmon around the world every year.

We have reviewed the old and new versions of the Sea Lice indicator 3.1.7 in the ASC Salmon Standard and the new version appears to dramatically increase the allowance for the number of sea lice permitted per adult salmon on ASC certified farms. For example, in the case of Scotland, we understand that previously, for farms in areas with wild salmonids, the ASC defined a maximum on-farm lice level of 0.1 mature female lice per farmed fish, during sensitive periods for wild fish. However, the requirement has now been changed to align with the jurisdiction standards of the country where the farm is situated. In Scotland, the industry sets its own thresholds for treatment of sea lice, under the Code of Good Practice for Scottish Finfish Aquaculture (2015), at an average of 0.5 to 1 adult female lice per salmon (depending on the time of year). This means that the ASC's revised approach equates to a fivefold increase in the permissible number of lice per farmed fish. Therefore, the Code of Good Practice as a mechanism for assessing ASC farms in Scotland is inappropriate.

ASC also certifies salmon farms in other countries around the world including Norway, UK, Chile, Canada, Faroe Islands, Iceland, Japan, Denmark, and Australia. Currently, the strictest on-farm lice level is in Norway (where only 0.2 adult female lice per fish are allowed), yet this still allows for more lice per fish than the ASC previously required in the Salmon Standard. The new Standard means that a considerably higher number of sea lice will be allowed on ASC certified farms in all countries. As sea lice remain such a significant problem in salmon farming, with substantial welfare, conservation, and economic consequences, this is not the time to lower standards, with an indicator that is insufficient to protect the welfare and health of farmed and wild fish.

This change appears to be at odds with ASC's own publicly stated objectives and promises to "Protect the health and genetic integrity of wild populations" (Principle 3 in the Salmon Standard), and

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<sup>1</sup> Tett, P., Benjamins, S., Black, K., Coulson, M., Davidson, K., Fernandes, T. F., Fox, C., Hart, M., Hicks, N., Hughes, A., Hunter, D. C., Nickell, T., Risch, D., Tocher, D., Vare, L., Verspoor, E., Wilding, T., Wilson, B., & Wittich, A. (2018). Review of the environmental impacts of salmon farming in Scotland. <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/107588.aspx>

<sup>2</sup> Susdorf R, Salama NKG, Todd CD, Hillman RJ, Elsmere P, Lusseau D. Context-dependent reduction in somatic condition of wild Atlantic salmon infested with sea lice. *Mar Ecol Prog Ser* [Internet]. 2018 Nov 15 [cited 2023 Jan 23];606:91–104. Available from: <https://www.int-res.com/abstracts/meps/v606/p91-104/>

“Manage disease and parasites in an environmentally responsible manner” (Principle 5 in the Salmon Standard).

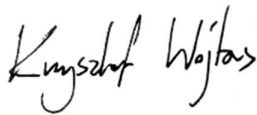
As a certification body that has worked to improve animal welfare by recently introducing a “Fish Health and Welfare Standard”, the ASC should reflect this aim by setting the bar much higher. Consumers who buy ASC-labelled salmon should feel certain that the fish were reared to stringent requirements that go beyond baseline standards or legal requirements.

In recent years, CIWFI has engaged with the ASC, providing input and feedback. We have recognised your efforts to improve fish welfare standards and we have celebrated when progress has been made. However, this change to sea lice management is a significant step backwards, which is disappointing and frustrating.

CIWFI urges the ASC to reverse this change to the Salmon Standard, and to keep the sea lice management requirement at a more ambitious and higher standard than the baseline.

We would very much appreciate a meeting to discuss this matter.

Kind regards,

A handwritten signature in black ink that reads "Krzysztof Wojtas". The signature is written in a cursive, slightly slanted style.

Dr Krzysztof Wojtas

Head of Fish Policy

Compassion in World Farming

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