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Emne: Høring NOU 2023: 23 Helhetlig forvaltning av akvakultur for bærekraftig verdiskaping

På vegne av de undertegnende NASCO-organisasjoner oversendes følgende innspill til høringen.

The Norwegian Government
Ministry of Trade, Industry and Fisheries.
Hearing
of document: NOU 2023: 23 Helhetlig
forvaltning av akvakultur for bærekraftig verdiskaping

We, the undersigned
NGOs accredited by the North Atlantic Salmon Conservation Organization (NASCO), present this proposal to the Norwegian government, reflecting our interest in seeing Norway's wild Atlantic salmon protected from the damaging impacts of open net pen salmon aquaculture. Our recommendations align with insights gathered from the NOU 2023: 23 Report, "Helhetlig forvaltning av akvakultur for bærekraftig verdiskaping," and the ongoing findings of the Norwegian Scientific Advisory Committee for Atlantic Salmon.

Key Proposal:
Transition to Closed Pen Technologies
We propose a transformative shift in aquaculture practices towards closed pen technologies. This shift is crucial to prevent the spread of salmon lice in the open waters of the Norwegian fjords, minimize the risk of fish escape, and facilitate the collection and reprocessing of sludge and waste. Such technology not only aligns with environmental sustainability goals but also presents opportunities for innovative waste management. This proposal would also enable Norway to meet the commitment it has made to NASCO and the international community to eliminate the impacts of escapes and sea lice on wild Atlantic salmon.

Rationale and
Supporting Evidence
This proposal is grounded in scientific evidence and aligns with the concept of Miljøfleksibilitet (Environmental Flexibility) introduced in the NOU. Environmental Flexibility suggests that aquaculture companies adopting sustainable technologies can increase their production capacity. This capacity increase would be determined by an 'adjustment variable' based on compliance with stringent environmental standards, including zero lice emissions, minimal escape risk, and effective waste management.

Financial
Incentives and Regulations
We advocate for a
strategic combination of incentives and regulations to expedite this
transition:
* Adjustment
Variable: Implement an adjustment variable that rewards early adopters of closed pen technology with increased production capacity.
* Lice Emission
Tax: Introduce a tax on salmon lice emissions from open net pens, complemented by a comprehensive emission rate regulation for each production area in Norway.
* Gradual
Implementation: The effectiveness of these measures can be enhanced by progressively reducing the adjustment variable and increasing the lice tax. This approach incentivizes swift adoption of sustainable closed pen technology and penalizes delay.

Conclusion and Call
to Action
While we defer to
Norwegian policymakers on specific values for the adjustment variable and lice tax, we emphasize the urgency and importance of these measures. Implementing these recommendations will signal a robust commitment to sustainable aquaculture, benefiting Norway's environment, economy, and global leadership in responsible fish farming.

Sincerely

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Short summary of
the findings regarding salmon lice and escaped farmed salmon from the Norwegian Scientific Advisory Committee for Atlantic
Salmon: Ref. page 3-4.
“Salmon lice have
the greatest impact on Norwegian wild salmon, and by far the greatest risk of causing further losses in the future. The number of salmon returning to the rivers each year is reduced due to post-smolt mortality caused by salmon lice. This reduction threatens salmon populations in the most impacted areas and has significantly reduced the harvestable surplus for river and marine fisheries over large parts of the country. The impact of salmon lice is most severe in western and middle Norway. The areas severely impacted have increased during the last five years. Many wild salmon populations in these areas have been heavily impacted by salmon lice for many years and are now in a very poor state. Several threats impact these populations, including escaped farmed salmon, but heavy salmon lice burdens are likely the reason that they are not able to recover. Sufficient mitigation measures to improve the situation are not implemented, and the production of farmed salmon is increasing.
According to reports
from fish farmers, 56 000 salmon escaped from aquaculture farms in 2021. The actual number is uncertain, but higher than the reported numbers. Due to a reduced occurrence of escaped farmed salmon recorded in rivers, the threat is adjusted slightly down compared to previous years. There is widespread genetic introgression of escaped farmed salmon in Norwegian wild salmon. In two thirds of the screened rivers, there were indications of genetic introgression from escaped farmed salmon in the wild population (150 of 239 rivers), of which 68 populations were severely impacted (28% of the screened populations). The scientific evidence that incidence of escaped farmed salmon will negatively affect Norwegian wild salmon, both ecologically and genetically, is strengthened during recent years. In addition to changing the populations genetically, hybridization between wild and escaped farmed salmon is also shown to reduce salmon production and survival.”

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