ASC GLOBAL REVIEW: IRELAND SUMMARY

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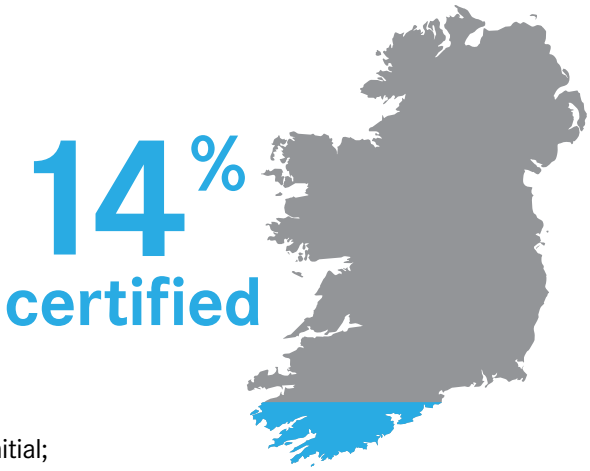
Irish farms account for less than one per cent of ASC certified production. Approximately 14 per cent (2,400mT)[1] of the Irish industry is certified.

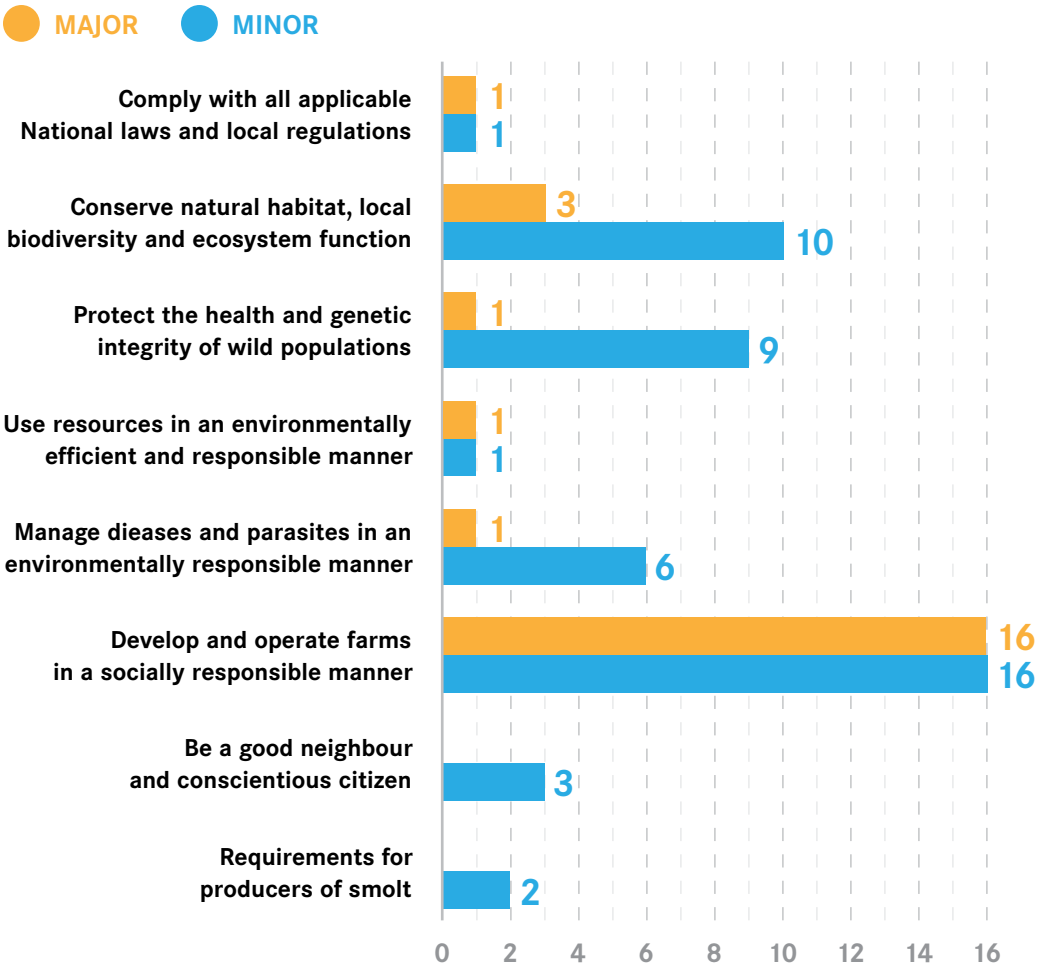


ANALYSIS

FARM CONFORMANCE

Assessing trends for Irish farms is challenging given that only three farms are certified and one farm's certificate has expired. Of the six audits reviewed (4 initial; 2 surveillance), there were a total of 24 major and 48 minor non-conformities raised.

IRELAND: MAJOR AND MINOR NON-CONFORMITIES BY PRINCIPLE



COMMONLY RAISED NON-CONFORMITIES:

- Benthic sampling and monitoring not completed due to early auditing
- Lack of sea lice monitoring on wild fish
- No regular community consultations
- Various socially responsible indicators in relation to working conditions

FARM PERFORMANCE

No farms had an area-based management agreement that fully complied with all Standard requirements. Two farms remained certified despite recording high maximum viral disease. Antibiotics use was low. Parasiticide use was common, however the average farm met the current PTI threshold. Irish farms successfully met the Standard's fish feed dependency ratios.

AREA-BASED MANAGEMENT (ABM)	All Irish audits refer to ABM agreements that are administered by the state-run Marine Institute, however these were found to be insufficient in meeting all Appendix II requirements. Single Bay Management (SBM) arrangements among salmon farming producers to coordinate separation of generations, annual fallowing and strategic treatment application, as well as to ensure good fish health management and cooperation between farms.[2] SBMs are utilized primarily as a sea lice control strategy.[3] SBMs appear not to address the cumulative components of Appendix I-1: cumulative use of treatments (e.g. antibiotics classified as "highly important" by WHO) and tracking of cumulative use of parasiticides. Nor does it appear to address resistance, wild salmon populations monitoring or a maximum SBM lice load. As the sea lice is the main focus of SBMs, it is unclear the extent to which disease and pathogen monitoring and information sharing between farms occurs. Finally, there is no mention on the Marine Institute website on setting a maximum SBM lice load.
SEA LICE MONITORING ON WILD SALMON	An approved variance exists that, in practice, exempt Irish farms from sea lice monitoring on wild salmonoids as the handling of wild salmon is prohibited due to their endangered status.[4] As a result, there is no evidence for what is arguably one of the most critical indicators of ecosystem health.
SEA LICE LEVELS	One farm (out of four) breached the ASC requirement during the sensitive period (March to May) with a value of 0.15 mature female lice per fish.
MAXIMUM VIRAL DISEASE	Two Irish farms recorded the highest values (67 and 34 per cent) due to Cardiomyopathy Syndrome (CMS).[5] Farms remained certified.
ESCAPES	No escapes above the Standard metric were recorded.
ANTIBIOTIC USE	2 audits reported antibiotic use for the grow-out stage, with a total of 2 treatments reported.
SEA LICE CHEMICAL TREATMENTS (I.E. PTI SCORE)	5 (out of 6) audits recorded parasiticide use. The average Irish farm has a PTI score of 6.4 which equates to around 2 treatments per cycle.
FISHMEAL FORAGE FISH DEPENDENCY RATIO (FFDRM)	The average Irish farm had a 0.78 FFDRm.
FISH OIL FORAGE FISH DEPENDENCY RATIO (FFDRO)	Globally, Irish farms have the lowest average score at 0.16 FFDRo. Ireland's substantially lower mean is a result of three (out of five) audits reporting the inclusion of trimmings (i.e. by-products from fish processing that are not fit for human consumption) within their fish oil sourcing. The Standard encourages the use of by-products and such sources are excluded from the calculation.
MARINE MAMMAL DEATHS	No audits recorded lethal incidents above the limit.

Transparency: Farm Public Reporting

Public reporting of on-farm sea lice counts, marine mammal and bird entanglements and estimated unexplained loss by certified farms was found to be relatively effective.

ASC AMENDMENTS OF CONCERN

OPERATIONAL REVIEW

Parasiticide Treatment Index (PTI) Review

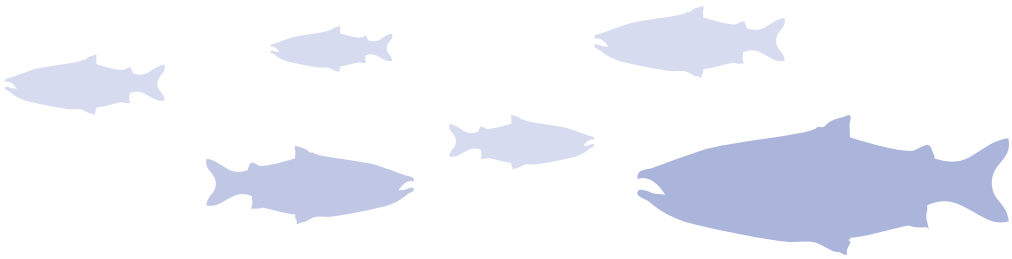
The ASC's proposed revision to the sea lice parasiticide treatment indicator would allow Irish farms up to 7 treatments per cycle.[6] The current treatment frequency allowance is 2-3 treatments, thereby, **the amount of parasiticide use allowed under the Standard would increase by 133% - 250%.**[7] It would take an Irish farm up to 9 years to reach the proposed 'global target' metric – defined at four treatments.

VARIANCES

3 variances have been approved, with one variance deferring to government regulation instead of the Standard criteria. Reuse of approved variances is uncommon; 9 citations of variances were found in audits. The average Irish audit cites 1.5 variances (global mean 2.4).

Common and Problematic Variances

Variances that exempt Irish farms from sea lice monitoring of wild fish was approved based on the fact that Irish regulations prohibit the handling of wild Atlantic salmon.[8] As a result, **there is no evidence for what is arguably one of the most critical indicators of ecosystem health**. It would be of greater benefit for auditors to confirm whether some alternative sea lice monitoring on juvenile wild salmon is taking place (e.g. by government authorities or academia) and is conducted with the necessary rigour and made publicly available.



1 ASC (2018). Direct communication.

2 Marine Institute (2018). Single Bay Management. https://www.marine.ie/Home/site-area/areas-activity/aquaculture/sea-lice/single-bay-management [Accessed May 2018].

3 DAFF (2008). A strategy for improved pest control on Irish salmon farms. Available at: https://www.agriculture.gov.ie/media/migration/seafood/aquacultureforeshoremanagement/SeaLiceControlStrategy%20230210.pdf [Accessed May 2018].

4 ASC (2018). VR 136: Sea lice counts and national regulation. http://variance-requests.asc-aqua.org/questions/vr-136-sea-lice-counts-and-national-regulation/ [Accessed April 2018].

5 Garseth, A.H, Fritsvold, C, Svendsen, J.C, Jensen, B.B & Mikalsen, A.B (2017). Cardiomyopathy syndrome in Atlantic salmon *Salmo salar* L.: A review of the current state of knowledge, *Journal of Fish Diseases*, vol. 41, pp. 11-26.

6 ASC (2017). ASC Salmon PTI Standard Operational Review – Consultation Paper September 2017. Public Consultation. Proposals to replace ASC Salmon PTI indicators 5.2.5 and 5.2.6. Available at: https://www.asc-aqua.org/wp-content/uploads/2017/07/Salmon-2-PTI-Operational-Review-Consultation-Paper-19-Sept-17.pdf [Accessed May 2018].

7 SeaChoice (2017). Re: ASC Salmon Standard Operational Review – 2nd PTI consultation. Available at: https://www.asc-aqua.org/wp-content/uploads/2017/11/ASC-PTI-2nd-consultation-SeaChoice-stakeholder-submission.pdf

8 ASC (2018). VR 136: Sea lice counts and national regulation. http://variance-requests.asc-aqua.org/questions/vr-136-sea-lice-counts-and-national-regulation/ [Accessed April 2018].

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This regional report is supported by technical and summary reports.
For the complete analysis and ASC's response, refer to the technical report.
Visit: www.seachoice.org/asc-global-review

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