



Sustainable Fisheries Partnership Discussion Paper:

Public access to environmental information
around salmon aquaculture

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Executive Summary

Salmon aquaculture is a rapidly expanding sector which has a range of environmental impacts. Although the industry is relatively well run and has little to conceal, it has not yet developed a consistent approach to disclosing environmental data.

A brief review of public access regimes around the world demonstrates that there is a great deal of variability in official arrangements for disclosing environmental information around salmon aquaculture. There has also been some voluntary disclosure by the salmon industry itself but this behavior is not universal across all companies and countries.

The salmon aquaculture industry would benefit from a uniform global approach to data disclosure for a number of reasons detailed in this paper. Such an approach could be negotiated between leading industry players and combined with encouragement for local regulatory

regimes to adopt similarly high standards.

There is sensitivity within the industry regarding the release of environmental impact data because this may generate public criticism. This sensitivity is particularly acute with regard to the disclosure of data for specific farms. This paper suggests that releasing data related to specific bodies of water (i.e., aggregated data from several units operating within the same body of water such as an estuary or loch/fjord), rather than individual farm-level information, would be a useful first step and that concerns about data release provoking public attack may be unfounded.

This paper concludes that an industry initiative to identify global guidelines for good practice in disclosure of environmental impact data would be invaluable in building the reputation of the sector and an important step forward in the development of aquaculture as a whole.

Introduction

Salmon aquaculture has expanded rapidly in recent years and continues to grow in value as a global industry. However, alongside the benefits of expansion come concerns around environmental impacts

such as disease, high densities of sea lice, escapes, and other issues.

Given that the oceans remain global commons that generate considerable interest and affection, it is not surprising that the public has legitimate concerns about aquaculture. These concerns are reasonable, although they can sometimes be based on misunderstandings generated by a poor knowledge of the industry.

Not just the public seeks reassurance – the entire aquaculture product supply chain needs to have oversight of the environmental impacts, both to better understand risk and to fulfil commitments to sustainability and transparency. Producers also benefit from robust transparency regimes that give them complete oversight of other aquaculture activities near their own operations that may impact upon them.

This short discussion paper by Sustainable Fisheries Partnership (SFP) examines the arguments in favor of public access to environmental information around salmon aquaculture and the benefits for producers, and reviews the current arrangements in four different locations – Chile, Scotland, British Columbia, and Norway.

Why should salmon producers care about public access to environmental information around salmon aquaculture?

The salmon aquaculture sector has many good reasons to give serious consideration to the issues surrounding public disclosure of environmental information:

- The salmon industry already works in highly transparent regulatory environments and has created some important voluntary initiatives (see below). It is inconsistent for global companies to adopt one set of disclosure practices in one country and then use another set of principles elsewhere. Over time it is inevitable that disclosure practices will converge around a global norm, and the industry would benefit if it controlled this process.
- The salmon aquaculture industry does not always have a good reputation among key stakeholder groups and this can frequently be based on ignorance and misunderstandings. The practical reality is that the salmon industry in general has little to hide – it is a relatively well-run fish-farming sector that has invested heavily in scientific and technical development and has good control over its activities. However, despite the very high standards that can be found across most of the industry, a widespread perception persists that salmon farming is a destructive practice that has issues it wishes to conceal. This inaccurate perception will not be successfully challenged until there is a high level of transparency in terms of environmental data. The UN Food and Agriculture Organization study “Environmental Impact Assessment and Monitoring in Aquaculture” (FAO Fisheries and Aquaculture Technical Paper. No. 527. Rome, FAO. pp. 455–535) concluded that, with regard to salmon farming: “There is a clear need for environmental data collected at farms to be placed in the public domain to increase confidence in the regulatory process.”
- Salmon aquaculture is now a huge global player in the food industry, and many companies have recognized their status through corporate responsibility policies and statements. These initiatives are to be welcomed and represent important steps forward, but in order to be fully consistent with other sectors of a similar scale it will be necessary to increase the quality and quantity of data disclosure. If the salmon aquaculture industry wants to be seen as a leading player in the debate around ecological sustainability it needs to become fully aligned with comparable sectors in terms of disclosure.
- Salmon aquaculture takes place in a public

commons – the marine environment – and this places the industry under a special responsibility to be transparent about impacts. This puts salmon farming in a different position to other protein-producing industries such as poultry or pork, although even in these cases there are usually regulatory controls on impacts outside farm boundaries with compliance-monitoring data available through official channels.

- Transparency around operations is a major topic of interest for the investor community. Institutions evaluating their investment options will want to take a clear view of a company’s environmental impacts in order to assess liabilities, risks, and whether the operation is well run. Substantial public disclosure by salmon aquaculture companies can only build confidence and trust in their organizations among potential investors.
- A major concern among salmon producers is that data placed in the public domain will be used by aggressive NGOs to campaign against the industry. This is a legitimate concern but there are reasons to doubt whether these fears are actually justified. In fact a casual assessment of the global situation suggests that where there is the greatest degree of transparency in the salmon industry there is the least activity by hostile NGOs and media. It is also the case that concealing data will always lead to opponents concluding that the very worst is true and the media accepting these assertions. A more open and transparent style of communication may well be an extremely effective public relations strategy in neutralizing opponents and building public trust.
- A commitment to very high standards of disclosure does not impact on the ability of responsible companies to effectively compete in the marketplace, but it does place a clear spotlight on those companies that are less responsible. This will mean that over time the industry as a whole will improve environmental performance.
- There is a significant relationship between public disclosure of information and the certification of aquaculture products. The current draft standards from the Salmon Aquaculture Dialogue (which will become the salmon standards for the Aquaculture Stewardship Council when agreed) are explicit in

requiring significant disclosures from any salmon farm that seeks to achieve certification to the standard, and this information will be public. A failure to disclose relevant information by any given salmon producer may effectively act as an obstacle to certification.

- From a retailer perspective, the need to achieve an assured supply is intimately linked to access to information about aquaculture production. Disease outbreaks can ravage stocks and cause major supply chain disruption and retailers need to have timely warnings of such events. Access to data around disease incidence, sea lice numbers, or other indicators can be invaluable for the supply chain when trying to establish the predictability of supplies and minimize risk. A good disclosure regime would provide significant reassurance to members of the supply chain and build closer relationships between producers and their customers.

Public disclosure regimes around the world - statutory

Public disclosure of data relating to salmon aquaculture varies widely between locations. We examine four case studies below:

Chile

The Chilean salmon aquaculture industry has had a difficult time in past years because of the devastating outbreaks of infectious salmon anemia (ISA) that have so damaged the sector and there has also been little official disclosure of information until recently.

In the immediate aftermath of the ISA crisis, the Chilean government did disclose some information around antibiotic use, salmon escapes during 2005-2007, fish densities in pens, and distances between

farms. The WWF-sponsored Aquaculture Dialogues played a significant role in stimulating the provision of further data.

There is currently no very recent and easily accessible data with regard to sea lice, disease, escapes, pollution, or veterinary medicine use in the public domain in Chile although it is possible to obtain limited amounts of information via specialist channels. However, this situation may be about to change.

In March 2011, as a result of a complaint by the Chilean NGO Ecoceanos, the official Chilean watchdog on access to government information (known, in English, as “the Transparency Council”) ruled that the national fisheries service (Sernapesca) should publish environmental information on salmon farms on their website. This ruling comes after a prolonged period of questioning by Chilean and international NGOs, which were interested in data surrounding the origins of the ISA crisis as well as other environmental impacts. Compliance with the ruling of the Transparency Council has not yet been achieved at time of writing.

United Kingdom (Scotland)

The UK salmon aquaculture industry is based exclusively in Scotland and is therefore governed by Scottish law. Public access to information about salmon aquaculture can be obtained from different sources depending on the nature of the material, and there is also a general provision for access to information under the Environmental Information (Scotland) Regulations 2004.

A specific example of public disclosure includes information on escapes from farms, which can be found on the Marine Scotland Science (formerly the Fisheries Research Service) website. Other information is reported to the Scottish Government, but not necessarily systematically disclosed to the general public. There is, for instance, no current systematic public reporting of data about disease, sea lice densities, veterinary medicine use, or discharges of feed/faecal pollution.

The general provisions under the Environmental Information (Scotland) Regulations 2004 have been used to obtain some relevant data about salmon aquaculture. The Salmon and Trout Association (a

UK NGO) recently obtained reports from the Scottish Government Fish Health Inspectorate for the years 2009 and 2010, which gave information on sea lice prevalence and disease at a large number of named farms.

Canada (British Columbia)

The issue of public access to information around salmon aquaculture has been hotly contested in British Columbia for many years and is further complicated by the transfer of official authority over aquaculture from the provincial government to the relevant federal ministry (the Department of Fisheries and Oceans – DFO) in December 2010.

Prior to the transfer of authority to the federal government, there had been numerous attempts to obtain data relating to farm stocking levels, sea lice occurrence, and disease. These attempts were never fully successful, and the data provided was often very old or not sufficiently detailed to be meaningful.

Since authority over aquaculture passed to DFO, aquaculture licences include a requirement that data on a range of issues (including stocking densities, sea lice, escapes, disease, and predator mortality) be passed from salmon producers to the federal government and there have been assurances that this information will reach the public domain. However, according to NGOs in British Columbia that have tracked this issue closely, there has so far been no systematic disclosure and there are doubts about whether the information will be made public in a comprehensive fashion and at farm level.

Norway

Norway is a major center for salmon aquaculture and has good provision for public access to information about the industry. A specific legal instrument safeguards public access to environmental information (Act of 9 May 2003 No.31 Relating to the Right to Environmental Information and Public Participation in Decision-making Processes Relating to the Environment) but also significant additional activity in terms of active information provision.

For instance, all salmon farms in Norway have to provide monthly reports of sea lice infestations to the Norwegian Food Safety Authority (called the Mattilsynet) and data can be accessed at a regional

level via the website www.lusedata.no.

Other forms of data about salmon aquaculture in Norway are presumably accessible via the legal provisions for access to environmental information. Norwegian NGOs have confirmed that in general they are satisfied with the disclosure arrangements.

Public disclosure of environmental data – voluntary

In addition to formal disclosure via official channels, the farming industry itself voluntarily places information around salmon aquaculture in the public domain.

Marine Harvest reports annually on issues such as escapes, sea lice, disease, and veterinary medicine giving monthly data for each country via a corporate sustainability report:

(<http://www.marineharvest.com/en/CorporateResponsibility/Sustainability-Reports/>)

Other salmon aquaculture companies also present similar data. For instance, Cermaq has won an award for its corporate responsibility reporting:

(<http://www.report2010.cermaq.com>)

A recent innovation by Marine Harvest in British Columbia is the provision of sea lice data at farm level via their website:

(http://www.marineharvestcanada.com/farming_fish_health_MHC_ALL_Farms.php)

Clearly some leading players in salmon aquaculture understand the value of disclosure and are playing an active role in placing data in the public domain. However, despite these laudable initiatives, there is still considerable variation across the sector in terms of publishing environmental data and this does not reflect well on the industry as a whole.

What could the salmon aquaculture industry do?

For the reasons cited above, the salmon aquaculture industry clearly has much to gain from a coherent approach to disclosing environmental impact data. Such an approach would bring real benefits and is unlikely to generate substantial additional costs.

Some companies are already using a template approach to report on their impacts via established corporate responsibility reporting tools like the Global Reporting Initiative. However, these approaches will only have relevance if they offer a level of resolution that is useful to those groups that have an interest in the data. Reporting environmental impacts annually at country level, for instance, doesn't offer much that is useful to the reader given the time lag in reporting and the averaging effect of pooling farm data for an entire nation.

On the other hand, some in the industry fear that full disclosure at farm level, month by month, would leave the sector open to severe public criticism. This view is not necessarily justified by the facts, but it is nonetheless genuinely held and as such needs to be respected.

A useful median position might be to adopt as industry good practice a commitment to disclose environmental data for specific water bodies, which are shared by several production units (quite possibly from different companies). This would mean that the aggregated environmental impact for a loch, fjord, lake, estuary, or similar body of water could be placed in the public domain without putting individual farms under the spotlight. This would generate information that was useful for a variety of stakeholders, including those with a direct interest in the quality of impacted waters and the performance of the industry in that area.

An approach based around publicly disclosing data for aggregated impacts in a defined water body – the “zone approach” - would not be without technical challenges given that more than one company may be operating in the same area. However, it does offer a useful approach that meets many needs:

- It provides the data that is necessary for those with a direct interest in the impacts on a given water body – for instance, other aquaculture operations and wild salmon catchers
- It avoids the need to attribute performance to specific production units (except where there is only one unit in the zone)
- It has the advantage of being established practice among some parts of the industry already. For instance, some relevant data for specific water bodies is shared with wild salmon catchers in Scotland.

Conclusions

Public access to environmental information about the salmon aquaculture industry is highly variable between countries, with Norway seemingly having the most transparent regulatory arrangements. Some leading players in the industry have launched significant initiatives in terms of voluntary disclosures but this behaviour is not universal across companies and countries.

This lack of transparency within salmon aquaculture is a problem for the industry as well as retailers and other parts of the supply chain. The salmon aquaculture industry could respond to this challenge by creating global guidelines for best practice in disclosing environmental impact data. This would allow progressive companies to sign on to a clear

statement on good practice consistent with best existing performance, applicable worldwide and with the ambition to evolve the system over time. Such an approach might be focused around public disclosure of aggregated data for specific water bodies rather than individual production units as a “best fit” between the needs of stakeholders and the “comfort zone” of the salmon industry.

A clear global commitment by leading players in salmon aquaculture with regard to environmental data would be a huge boost to the public reputation of the sector and build confidence and trust throughout the supply chain. It might also represent a useful addition to any industry public relations strategy seeking to reach out to a wider variety of stakeholders and give deeper foundations to corporate reputation.

Further discussion

SFP invites further discussion around the issues raised in this paper. Please feel free to contact:

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