



ATLANTIC SALMON FEDERATION

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R. William Taylor
President

September 20, 2010

Mr. Erick Solheim, Minister
Ministry of Environment
P.B. 80913 Dep
0030
Oslo, Norway

Dear Minister Solheim:

I am writing in support of the recent letter written to you by Orri Vigfusson, Chairman of the North Atlantic Salmon Fund (NASF), regarding steps that Norway should take to control its mixed-stock Atlantic salmon fishery and its salmon aquaculture industry. I am writing on behalf of the Atlantic Salmon Federation (ASF), a non profit conservation organization, with charitable status in the United States and Canada, headquartered in St. Andrews, NB, Canada. ASF is dedicated to the conservation, protection and restoration of wild Atlantic salmon and the ecosystems on which their well being and survival depends. We are actively involved in international Atlantic salmon conservation through the North Atlantic Salmon Conservation Organization (NASCO). We are also partners with the NASF in the conservation agreement with Greenland fishermen that has suspended Greenland's commercial Atlantic salmon fishery since 2002.

Of the mixed-stock fisheries for wild Atlantic salmon currently still operating in home waters in the North Atlantic, the Norwegian coastal fishery in Finnmark is of the most concern. This is a large fishery that takes about 30,000 salmon annually and intercepts stocks from Norway, Finland and Russia. Fisheries on mixed-stocks, particularly in coastal waters and on the high seas, pose particular difficulties for management, as they cannot target only stocks that are at full reproductive capacity. NASCO's Agreement on the Adoption of a Precautionary Approach, to which Norway has agreed, states that management measures, taking account of uncertainty, should be aimed at maintaining all salmon stocks above their conservation limit.

On the impacts of aquaculture, the average percentage of escapees in the river breeding stock is over 15%, many times higher than genetically acceptable. One of the major reasons is the unreported escapes of smolt, estimated by scientists to be as high as 3.5 million, which was almost ten times higher than the number of returning salmon to Norwegian rivers in 2009.

Despite the endless pledges and commitments made by industry, escapes and sea lice management (now compounded by sea lice treatment resistance) show no signs of being controlled to a satisfactory level for the protection of wild fish. Self-regulation by the industry has clearly failed. There is dire need for Norway to set new standards, both technological and environmental, to protect wild salmon from the negative impacts of the fish farming industry.



Mr. Erick Solheim, Minister
September 20, 2010
Page 2

ASF urges Norway to exhibit to the international North Atlantic community its commitment to conservation and precautionary management by eliminating its mixed stock wild Atlantic salmon fisheries and implementing effective management of the impacts on wild fish of the salmon aquaculture industry.

Respectfully yours,



Bill Taylor

Cc: Orri Vigfusson