

Wilderness Tourism Association



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January 25, 2010

Honourable Gail Shea
Minister of Fisheries and Oceans Canada
200 Kent Street
Ottawa, Ontario, K1A 0E6

Dear Minister,

Re: Aquaculture Interim Measures required now in order to save wild salmon

Background

Wilderness tourism (or nature based tourism as it is commonly called) is a key contributor to BC's GDP and a significant private sector employer in BC. Direct tourist expenditures on wilderness or nature-based tourism products in British Columbia is approximately \$1.5 billion dollars¹ and provides for the equivalent of over 26,000 full time jobs.

All BC communities feel the impact of wilderness tourism in their economies. A large percentage of these businesses are small, localized businesses that provide stability, diversification and job creation, whether it's in the wilderness, in or near communities and municipalities, or on First Nations settlement land. Wilderness tourism is a sustainable economic driver for BC. As other boom and bust resource sectors come and go in our communities tourism will continue to form a significant part of the economic foundation.

For eight years now the Wilderness Tourism Association (WTA), and other concerned stakeholders, have been asking for open net cage salmon farms to be properly regulated to remove the impacts imposed on juvenile wild salmon caused by sea lice incubated on salmon farms. In the same eight years we have been pleading with government to have safe migration routes without these 'barriers' for juvenile wild salmon.

The regulations, as they currently exist in BC, are woefully inadequate to protect wild salmon as they do not address the impacts that open net cage salmon farming has on the wild salmon stocks. There is no requirement in the current provincial regulations for the salmon farmers to sample the wild juvenile fry around the farms during the infectious sea lice stage. And we know from independent research that tens to hundreds of millions of salmon fry have died from sea lice incubated on open net cage salmon farms creating a 'barrier' to the wild salmon on their out migration routes. Until this problem is resolved all the good efforts to repair and improve salmon spawning habitat are being undermined.

After many years of devastating sea lice infestation on the wild salmon stocks of the Broughton Archipelago, in 2008 the salmon farming industry finally implemented the correct use of the

¹ Tourism British Columbia

chemical SLICE as a management practice. The timing of the application of SLICE was adequate to kill most of the incubating sea lice on their farms so as to minimize the transfer of sea lice to passing wild stocks. Fortunately, 2009 had good salmon returns in the Broughton Archipelago, most likely due to the correct application of SLICE. However, we must seriously caution the use of SLICE as an on-going management practice, because we know from experience in Norway and elsewhere that the application of SLICE will not be effective for long as the lice will become resistant.

More recent independent sampling of Fraser River sockeye smolts in the Discovery Islands over the last few years has indicated that these wild salmon populations have been infected by the sea lice incubated and transferred by the open net cage salmon farms in that area. We can predict that these smolts are also being weakened and/or possibly killed by these lice infestations. Unfortunately, Fisheries and Oceans Canada (DFO) has turned a blind eye to this independent research and has instead focused their blame for the sockeye collapse on other factors such as global warming. The DFO Executive has categorically declared that the collapse wasn't due to fish farms despite a lack of certainty by its own scientists as to the cause. The Fraser River sockeye judicial inquiry that is just getting under way will hopefully clarify the causes of the collapse as well as look into the corresponding managements actions of DFO. However, at best it will take over a year before any meaningful conclusions are to be reached and to formulate recommendations that will save our wild salmon.

The jurisdiction over the management of open net cage salmon farms in BC will transfer from the province to the federal government come February 10, 2010, as per the Supreme Court of BC decision. However, DFO has asked the Supreme Court of BC for an extension of an additional eleven months in order to develop meaningful regulations and organize the aquaculture branch. In either scenario most of the current BC Ministry of Agriculture and Lands (MAL) regulations will be adopted until such a time that the new federal regulations are complete. As indicated the regulations and policies currently in place under the provincial government are woefully inadequate and will not protect our wild salmon.

Last summer, the WTA, and other stakeholders, made submissions to DFO regarding needed regulations, and the urgency to implement them. We continue to participate in the process to develop new Finfish Aquaculture regulations currently underway. It should also be noted that the BC Salmon Forum released its findings and recommendations just under a year ago, including the regulatory changes needed to save the wild salmon in BC.

Measures to protect Wild Salmon

Given that it could take DFO up to 11 months or more to develop federal regulations, we desperately need interim measures in place for the 2010 out migration of wild salmon (i.e. March – July). We implore you to implement the following interim measures now:

- During the out-migration period for wild salmon (March 1 to June 30), the sea lice levels on wild juvenile salmon must, at minimum, be maintained at background levels, or less. An extension to July 31 should be considered for areas where juvenile Fraser River sockeye are known to migrate.
- Comprehensive, independent monitoring of lice levels on wild juvenile salmon migrating past the farms must be in place coast-wide, and with funding from the salmon farming industry. The results of wild salmon sampling must be transparent and available to all stakeholders and the public.

- If it is found that the background sea lice count is exceeded then the salmon farm will be shut down or other remedial or compensatory measures will be implemented.
- The establishment of a migratory corridor, free of salmon farms is established from the mouth of the Fraser River to the north end of Queen Charlotte Strait.

We realize that there is a lot of work to develop a comprehensive, set of aquaculture regulations. However, in the meantime the sea lice ‘barriers’ imposed by the salmon farms are heavily impacting the wild salmon. You need to recognize this and implement appropriate measures to prevent this from occurring in the short term. We are positive that there is a mechanism where by these interim measures (or interim regulations) can be implemented under existing legislation or policy with little burden on DFO resources (e.g. under the Wild Salmon Policy). These measures can then be rolled over into the new DFO regulations.

Further, it is also our position that government (at either level) needs to follow the precautionary principle, and that no further expansion of salmon farms or new lease sites be approved until the new DFO aquaculture regulations have been implemented.

Your urgency on this issue is required. The health and survival of wild salmon, and our tourism industry depends on it.

Yours Sincerely,



Brian Gunn, President
Wilderness Tourism Association

Cc: Prime Minister Harper
Premier Gordon Campbell
Hon. Steve Thompson, Minister of Agriculture and Lands
Trevor Swerdfager, Director General, Aquaculture Management Directorate
Larry Pederson Deputy Minister, Ministry of Agriculture and Lands
Harvey Sasaki, ADM, Strategic Industry Development Division, MAL