

Wilderness Tourism Association



PO Box 2160 • Campbell River, BC • V9W 5C5 • (250) 286-4080 • www.wilderness-tourism.bc.ca

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Strathcona Regional District
301-990 Cedar Street
Campbell River, BC V9W 7Z8

Re: Seizing the opportunity to support closed containment aquaculture technology

The BC Wilderness Tourism Association (WTA) is writing in response to the recent decision by the Strathcona Regional District (SRD) to approve a rezoning application pursuant to Bylaw No. 29 to allow Grieg Seafood to establish a new finfish farm in Sunderland Channel.

Wilderness tourism contributes \$1.5 Billion in direct revenues to the BC economy and generates 26,000 full time jobs. Our economic impact doubles to \$3.0 Billion when we include indirect and induced revenues and benefits and some 52,000 jobs. As an industry sector that depends on a resilient wild salmon resource, this aquaculture zoning decision is of extreme importance to us. As conveyed at the SRD meeting and reported in the media it appears that the decision to approve the rezoning application was motivated primarily by job creation. The WTA is writing to ask that this decision be reconsidered with serious consideration given to the environmental threats posed by open net-cage salmon aquaculture and the related impacts on existing jobs in the wilderness tourism and other industries reliant on healthy wild salmon stocks.

Wild salmon are obviously key to BC's significant recreation fishery. They are also key to the rest of BC's tourism industry. The very icons that we use to sell BC and support nature based tourism: bears, orca whales, forests are directly dependent on healthy salmon populations. These species are already in jeopardy due to low salmon returns. We need to take every precaution and do everything in our power to protect our salmon.

The SRD decision will allow Grieg to place an open net cage farm containing up to 4400 tons of biomass (about 700,000 fish) at mid Johnson Strait. These fish are being placed directly in the path of BC's largest migration of wild salmon. Peer reviewed and published scientific research supports a finding that this site will incubate sea lice, viruses and bacteria, with high potential to decimate key outruns of wild salmon. Despite our efforts, it has not been possible to receive a copy of the actual motion from the SRD. However, based on media reports, which we are told accurately reflect the motion, we understand that the approval is subject to Grieg meeting sea lice control provisions and a move to closed containment when it is shown to be commercially available. These provisions demonstrate that the SRD understands there are serious environmental issues related to open net-cage salmon aquaculture; however, the provisions have serious shortcomings and raise significant concerns.

The independent science is unanimous in its conclusion that open net caged salmon farms are killing the out migrating salmon fry by the millions through sea lice transfer as they pass by the farms. One farm, especially one of the magnitude proposed here, has the ability to generate

enough sea lice to kill millions of juvenile wild salmon. Suggesting that harvesting and fallowing before the out migration of the juvenile salmon, as a control measure is not entirely correct. If Grieg Seafood uses their proposed 22-month grow-out cycle, the Gunner Point farm would only be fallowed on alternate years. The year that the farm is not fallowed will add to the cumulative impact from the many open net-cage farms that are sited southeast of the site that are already decimating out migrating wild salmon juveniles. We also know from past experience with the Fife/Tribune route in the Broughton Archipelago that fallow plans are often plagued with problems. In addition, we do not believe that the “zero lice plan” that Grieg alludes to is possible with the use of the in-feed drug “Slice”. In Canada “Slice” is currently approved only for emergency use, and should not be relied on as a mechanism for managing sea lice, particularly given the risks to other marine life. Overall, the risk of amplified sea lice and disease is too great in this location given that approximately 1/3 of all BC wild salmon pass in some years. In light of the available independent science and the decline in BC’s wild salmon, open net-cage salmon farms must be removed from key migratory routes, not added to them.

Rather than permit new investment in old technology, it is now the time to direct salmon aquaculture investment to closed containment technology. The results will be better protection of BC’s wild salmon and marine environment, while ensuring BC’s salmon aquaculture industry is prepared to take advantage of a shift that is occurring in the market place. New farms should be permitted only on the basis that closed containment technology is adopted from the outset. The WTA strongly supports the movement to closed containment technology and applauds the support that the SRD has also given to this movement. Unfortunately, the proposal for transition to closed containment associated with this application raises serious concerns. Essentially, we understand that there is no commercially available closed containment technology that will work at the Gunner Point site. Thus the wording “that the (Gunner Point) site will be converted to closed containment technology as soon as it is commercially available” is problematic.

There is a better solution with respect to closed containment that will allow Grieg to increase production, provide jobs for the salmon farm industry and allow the nature based tourism industry to grow. There are models that are commercially ready to go. One example of ocean based closed containment salmon aquaculture is the floating closed containment pilot under development by the Middle Bay Sustainable Aquaculture Institute (MBSAI). The plan will see four solid wall tanks (two 24 metre and two 30 metre tanks) built in Middle Bay at a cost of \$6 million. The initial project will include one 24 metre tank and an anchoring system for four tanks costing \$2.8 million. The design is complete and approved by engineers, contractor prices have been received and the project has been given approval by independent sources. To get the first tank built and in the water, MBSAI needs to raise another \$1 million and they could receive fish in 5-6 months. The WTA is actively supporting the MBSAI funding initiatives.

There is no other commercially available technology that can transition so quickly to a working model and MBSAI is willing to share its technology with prospective closed containment fish farmers. However, closed containment salmon aquaculture systems are best located close to communities where economically priced power and servicing is available. The capital costs of closed containment are higher than open net cage farms; however, the reduced risk of loss of farm fish to disease, reduced grow out times, and operating cost savings from not having to staff remote locations, and transport personnel, feed, equipment, fuel and fish more than offset the additional power cost for pumping oxygen and water which are relatively low when designed so that there is no head to pump. Moreover, there is an increasing number of major buyers such as Canada’s Compass Group – a large institutional purchaser – as well as Whole Foods and Overwaitea that are committed to no longer purchasing open net-cage farmed salmon.

We strongly urge the SRD to work together with Grieg Seafood to adopt the available MBSAI technology and to move their Gunner Point farm application to the east coast of Vancouver Island where they can have road and power access for a closed containment farm. We also urge the two parties to ask the provincial and federal governments to fast track a site tenure application and to provide other assistance to make this a reality, and thereby making the intent of SRD motion a reality.

This is a practical solution to the problem of developing a viable salmon farming industry and *adding* jobs in depressed coastal communities. Salmon farming is an important sector, generating about \$800 million in revenue (direct and indirect and induced) and some 6000 jobs, but it cannot be carried out in a manner that is at odds with nature based tourism and the recreational and commercial fishing industries. The WTA believes that salmon farming can become sustainable and co-exist with wild salmon and the industries that it supports. Both the Legislative Committee for Sustainable Aquaculture and the Pacific Salmon Forum have concluded that sweeping changes in the way the salmon farm industry is managed and regulated are required including the transition to closed containment as soon as possible

The time to seize the initiative and opportunity, and support closed containment is now. It is essential that the SRD continue to lead this transition. Thank you for considering the WTA's comments on this important issue.

Respectfully,



Brian Gunn, President
Wilderness Tourism Association

Cc: Peter Gibson, Managing Director, Grieg Seafood,
Honourable Gail Shea, Minister of Fisheries and Oceans
Honourable Steve Thomson, Minister of Agriculture and Lands
Trevor Swerdfager, Director General, Aquaculture Management Directorate, DFO
Larry Pedersen, Deputy Minister, Ministry of Agriculture and Lands