

# Wilderness Tourism Association



BRITISH COLUMBIA | CANADA

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April 10, 2012

The Honourable Keith Ashfield  
Minister of Fisheries and Oceans  
Parliament Buildings, Wellington Street  
Ottawa, Ontario, K1A 0A6

Dear Minister,

**Re: Restrictions on British Columbia's chinook fishery**

I am writing on behalf of Wilderness Tourism Association (WTA), and our members who operate nature based tourism businesses throughout British Columbia. We are very concerned with the recent proposals to restrict or perhaps close important recreational chinook salmon fisheries.

The proposed chinook restrictions, according to DFO, are due to poor returns of some key stocks. Some commentators have suggested that the causes of the poor returns include habitat loss and water extraction. DFO itself has cited water temperature and other climate conditions as being responsible.

There is no doubt that these factors are present and could be contributing to the poor returns of chinook. However, it is the strongly held opinion of the WTA that these poor returns could more likely be linked to two viruses: Infectious Salmon Anemia (ISAv), which DFO scientists found in 55% of east Vancouver Island chinook; and Salmon Leukemia virus, which, according to DFO evidence, has been in south coast waters since 1990, and found by DFO scientists to infect 100% of chinook, killing most of them. Despite the DFO and the Province of BC continuing to deny these facts and appearing to go at length to hide this evidence, these pathogens are real and they are present in British Columbia and appear likely linked to BC's salmon farming industry. We already know that these viruses can be incubated and spread through salmon farms.

For this and other reasons, the WTA urges government to adopt a precautionary or risk management approach towards the management of our wild salmon stocks. Currently, there are already 130 licensed salmon farms on the coast of BC and independent research indicates that these farms are associated with severely depleted numbers of BC wild salmon. We need the two levels of government to create a moratorium on the expansion of open net caged fin fish aquaculture on the entire coast of BC, including the massive new salmon farm site application at Plover Point in Clayoquot Sound. This moratorium is needed until there is a clear demonstration and agreement (supported by peer reviewed science) that open net caged salmon farms have minimal or no impact on wild fish stocks.

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**“Ensuring a sustainable future for BC's wilderness tourism industry through leadership, advocacy, and stewardship.”**

In addition, we also need DFO to inform us as to why we should have confidence that the positive ISA virus tests on farm and wild salmon in BC should be ignored. In particular, we need to know what action has been taken in regards to the ISA positive tests in Clayoquot Sound Chinook farms reported by DFO at the December ISA hearings held by the Cohen Commission. If the results are suspect, please inform us of what follow-up tests have been done. We request that the labs currently finding ISA virus be included in this work. This is an acute concern as some of our members are investing in restoring chinook in this area, with no success and it is damaging their business.

We understand the CFIA is beginning a surveillance program for several viruses, but as Dr. Klotins testified, the CFIA is not working to meet the goals of the Wild Salmon Policy. The CFIA appears to be dedicated to protecting trade, not wild salmon. We are very uncomfortable and concerned with the level of disagreement between the labs. There has to be immediate testing of farm salmon using several labs simultaneously.

With these risk management approaches in place, the WTA could then support restrictions on the chinook fishery. These restrictions would need to be fairly and equitably distributed across all fisheries: sport, commercial and First Nation food and ceremonial fisheries.

Thank-you for taking the time to address our concerns.

Yours truly,

Brian Gunn  
President  
BC Wilderness Tourism Association

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Mr. Randy Kamp, Parliamentary Secretary to the Minister of Fisheries and Oceans  
Mr. Fin Donnelly NDP Critic, Fisheries and Oceans  
Mr. Lawrence MacAulay, Liberal critic for Fisheries and Oceans