

Wilderness Tourism Association



BRITISH COLUMBIA | CANADA

PO Box 423; Cumberland, BC; V0R 1S0; (250) 336-2862; www.wilderness-tourism.bc.ca

June 14, 2011

Steering Committee
Salmon Aquaculture Dialogue

Dear Steering Committee,

Re: SAD Standards

We are writing to provide our comments on the Salmon Aquaculture Dialogue and the proposed standards/criteria that will lead toward certification of the salmon aquaculture industry.

We would first like to acknowledge and congratulate the World Wildlife Fund and other stakeholder groups for having the foresight to pursue a standards for the aquaculture industry and an associated accreditation/certification system. It has been a great way to engage all stakeholders that have an interest in salmon aquaculture and encourage a constructive dialogue around the issues related to this industry. The SAD process itself has done a good job of covering the issues and addressing the concerns involved in each issue area. However, the WTA feels very strongly that the process still lacks the appropriate information and clarity to set certifiable standards. The evidence that the proposed SAD standards will protect our wild salmon from the impact of salmon farms is still not there and therefore we cannot support them. For this reason we also can not support the subsequent certification process at this time as it currently exists.

Generally speaking, there is no certainty that adoption of farms of these standards will protect the wild salmon stock. In reference to Principle 3: Protect the health and genetic integrity of wild populations, in general there continues to be a lack of agreement and inconsistencies around the impact of salmon farms on the wild salmon stocks in British Columbia, and the management of this impact. For example, with respect to the standards related to sea lice levels on farm fish, the threshold(s) for lice that can be transmitted to wild fish and not have a significant impact are not clear and not proven. Also, the standards related to threshold numbers of lice on farm fish before treatment, and the timing of treatment do not align with current farm practices in the Broughton Archipelago where lice levels appear to have been reduced through such measures. For example lice treatment is often done months before the out migration of salmon smolts. The farm lice thresholds for treatment also relate only to *Lepeophtheirus salmonis* and say nothing about *Caligus* impacts on health of wild salmon. The science around the impacts of *Caligus* is still not understood but precautionary measures need to be in place.

Regarding transparency, the standards appear to require the salmon farms to only make some performance data publicly available and other performance data available to the ASC1. It should be

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acknowledged that to date both government and the salmon farm industry have been complicit in various forms of obfuscation and the sampling of wild fish around the farms by the DFO and Industry has generally not been made available to the public. Only thru the Cohen Commission has information on the impacts from lice and seaward been made available, however it is not available to the public.

Certification will mean to the general public that salmon farms are meeting the sustainable standards thereby minimizing their impact on wild salmon and other integral parts of the marine ecosystem. As currently proposed, the SAD standards have not been able to demonstrate that this is true. As noted, there are also many areas where standards and/or thresholds have yet to be determined and the SAD is looking for further input. We also need to see processes in place to deal with those salmon farms that have been certified, but are not following through on meeting the standards. For example, what penalties will be levied for non-compliance. These processes or requirements have to be clear, transparent, and easy to enact. Our position therefor is that while the current draft standards are a significant step forward, they are not worthy of certification. We fear that unless the accreditation/certification had some kind of graduated system built in that the process would be hard to control. So we need to get it very right the first time.

The farm industry should try over the next couple years to use the standards as a guide or industry best practice. At the same time, the regulatory agencies and researchers need to come to agreement over impact of salmon farms on wild stocks. We need to see adequate sampling programs of wild salmon set up and funded so stakeholders can agree on the impact of sea lice transmitted to wild salmon, and ensure that this impact is not harmful to wild salmon before certification can be granted. The preparation of data on wild salmon escapements per year for all major spawning areas needs to be made available to the public in a more timely fashion. Sampling of farm salmon stock and wild salmon stock also needs to be carried out on a regular and timely basis.

We would suggest a time line of several years working with the proposed standards and improving on the research to actually determine if the standards will protect the wild salmon stocks before giving consideration to certification. At such a time the WTA would happily support the certification of the salmon aquaculture industry.

Regards,

Brian Gunn
President
BC Wilderness Tourism Association

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