

A Submission to the
Federal Parliamentary
Standing Committee
on Fisheries and Oceans
May 2002

T. Buck Suzuki Environmental Foundation

Salmon Aquaculture in British Columbia



Land-based closed contained salmon farm – Cedar, B.C.

Salmon farming as is currently practiced in British Columbia is not sustainable and threatens wild salmon and other marine species.

The T. Buck Suzuki Environmental Foundation is not opposed to salmon aquaculture, but we are convinced that the minimal regulations imposed to date by the provincial government are wholly inadequate to address the known impacts from this new industry.

Further, we believe that the federal Department of Fisheries and Oceans is neglecting its obligation to protect wild fish by turning a blind eye to significant threats to wild salmon and by refusing to conduct research into impacts that are well-known and well-documented in all other countries where fish farming has existed for some time.

Commercial fisheries are currently being managed under a new “risk averse” management strategy founded on the notion that if risks to weak species are too great or if there is insufficient information to properly assess environmental risk, commercial fisheries will be shut down to give priority to environmental protection.

This fundamental principle for the protection of wild salmon is being blatantly ignored by those promoting salmon aquaculture within Fisheries and Oceans Canada. Despite ample evidence of habitat alteration and pollution caused by specific salmon farms contrary to the federal Fisheries Act, **not one** salmon farm has been charged with an offence over the last twenty years.

There is currently very little information and almost no research into the impacts from sea lice and infectious diseases being transferred to wild salmon and other wild species, yet Fisheries and Oceans has not evoked the “risk averse” principle or the precautionary principle in managing salmon farming, nor has it launched any research into the scope of this threat despite major impacts from sea lice and disease transfer in European jurisdictions.

The B.C. government has announced the imminent lifting of their moratorium on new salmon farm sites, despite the fact that they have failed to implement the majority of recommendations of their own environmental assessment review which concluded in 1997 that 49 significant changes to regulation, policy and practices were needed to move the salmon farm industry towards sustainability. Our analysis reveals that:

- Five of the Salmon Aquaculture Review’s 49 recommendations have been adequately implemented to date. Most groups in the environmental sector would consider that the measures taken are not tough enough.
- Ten recommendations have been partially implemented with important sub-recommendations ignored.
- The implementation of 6 recommendations is unknown as the government has either refused to provide any information on their status or their status is unclear. Most of these relate to fish health, disease, parasites and drugs.
- A total of 28 recommendations have either had no attempt at implementation or the measures taken are so incomplete they cannot be considered to have fulfilled the intent of the Salmon Aquaculture Review.

More revealing is the nature of the regulations that have been imposed on the salmon farming industry since 1997.

1. A new provincial Escape Prevention Regulation was put in place in October 2000. It has since been amended removing dozens of sections, and seriously eroding others.
2. A new provincial Waste Regulation has been drafted and may be enacted by the end of May 2002. Conservation groups believe it is far too weak and will prevent charges except in cases of severe seabed pollution, contrary to any reasonable interpretation of the federal Fisheries Act.
3. New provincial salmon farm siting criteria and site planning mechanisms ignore the impact of sea lice and disease on migrating juvenile salmon, ignore threatened species and ignore the impact on traditional fisheries and First Nations constitutionally protected fisheries.

We believe that constitutionally it is the Federal Government that has the primary responsibility for the protection of wild salmon and the marine environment. Yet the record of the Federal Government to stand up for the protection of wild fish has been appalling to date. As pointed out by the federal Auditor General, Fisheries and Oceans has not done the research to make it possible to set reasonable policy based on science. The research and monitoring vacuum continue to this day. Specifically, Fisheries and Oceans Canada:

1. has not monitored to establish how many sea lions, seals, otters, etc have been killed by salmon farmers nor has it established any conservation target or maximum allowable total kill
2. has not researched the long-term impacts of escaped Atlantic salmon colonizing wild salmon streams
3. has not researched the impacts of sea lice pesticide application on local shellfish stocks
4. has not researched the impact of sea lice and salmon disease transferred to wild salmon stocks, both juvenile and adults on wild salmon migratory routes passing by concentrations of salmon farms
5. has not assessed and mapped juvenile salmon migration routes in order to establish a precautionary siting approach
6. has not established precisely the level of seabed pollution that would lead to charges under the Fisheries Act
7. has not researched the impact from escaped farmed Atlantic salmon on wild B.C. salmon streams
8. has not monitored escaped farmed Pacific salmon (chinook and coho) and has not studied the impact of these escapes on wild salmon stocks.

This should be considered a partial list.

Given this abysmal lack of information, research and analysis Fisheries and Oceans should be applying its own stated guiding principles as established in other position papers such as the “risk averse” salmon fishery policy or the Marine Protected Area Guiding Principles, such as:

1. **Risk averse approach**
This has never been applied to salmon aquaculture nor have the risks been identified or quantified.
2. **Working with people**
The federal government has refused to work with affected stakeholder groups on this issue and has never held any consultative meetings to get input on proposed policy direction.

3. **Respecting First Nations and the Treaty Process**
Most First Nations do not agree that there has been consultation in the development of the federal salmon aquaculture policy, nor have their First Nations constitutional fishing rights been respected.
4. **Fostering Ecosystem-Based Management**
There is not enough baseline information or research on ecosystem impacts to establish an ecosystem approach to salmon aquaculture, and the impacts that have been identified are largely being ignored.
5. **Precautionary Approach**
As stated in the Fisheries and Ocean documents, this means “when in doubt, be cautious,” putting “the burden of proof on any individual, organization or government agency conducting activities that may cause damage to the marine ecosystem” – this principle has been entirely sidestepped by the Federal Government’s desire to forge ahead as the “enabler” of salmon aquaculture forsaking its role as conservation watchdog as framed in the federal Fisheries Act.
6. **Managing for Sustainability**
Fisheries and Oceans has stated that “resources in areas requiring protection must be cared for in the present so that they exist for future generations” and that “emphasis will be placed on maintaining viable populations of all species and on conserving ecosystem functions and process” – again this principle has been subverted by the Federal Government’s professed role as “enabler” of salmon aquaculture and by its distinct lack of performance in taking measures to protect wild stocks or to prosecute salmon farms that have clearly contravened the federal Fisheries Act.

We ask the Standing Committee of Fisheries and Oceans to call on the Department of Fisheries and Oceans to reaffirm its primary mandate in protecting wild stocks and the marine environment and to establish clear policies that put conservation first as is stated implicitly and explicitly in the Fisheries Act.