

March 1, 2010

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

Dear Minister,

Re: Measures required to protect migrating wild salmon in 2010 and beyond

In light of the collapse of most Fraser River sockeye stocks in 2009, and a suggested link to impacts from disease and sea lice from salmon farms, we the undersigned call on the Federal government to implement emergency measures required to protect migrating wild salmon in 2010.

The finfish aquaculture regulations, as they currently exist in BC, are inadequate to protect wild salmon, as they do not address the impacts that open net cage salmon farms have on the wild salmon stocks. For example, there are no requirements in the current provincial regulations for the salmon farming industry to monitor the health of juvenile wild salmon for impacts due to disease and sea lice around farms during their outmigration.

We acknowledge DFO is working hard to develop new finfish aquaculture regulations and we continue to participate in this process. Many of the signatories to this letter have provided full submission to DFO regarding the long-term requirements for regulation to ensure a sustainable aquaculture industry and protection for BC's wild salmon and the marine environment. However, as we have learned from DFO officials, the earliest the new finfish aquaculture regulations could be in effect would be in October or November 2010. The most threatened stocks desperately need government actions to protect the 2010 out migration of juvenile wild salmon, and we urge you to implement the following emergency, interim measures now:

1. Emergency Migration Corridor to Protect Fraser River Salmon

To provide protection for the next generation of Fraser River salmon to begin migrating out of the river and through a constrained passage area, with a high density of open net cage salmon farms, we call on the federal government to require immediate harvesting of three farms. There are currently five active open net cage salmon farms in the Wild Salmon Narrows of northern Georgia Strait. The farms of most concern for the 2010 migration are the three farms containing adult salmon: Venture Point (Mainstream/Cermac), Cyrus Rocks and Okisollo/Sonora (Marine Harvest).

This emergency risk management measure will reduce the pressure of sea-lice transfer in at least one passage through the northern Georgia Strait on this year's juvenile Fraser River salmon making their way to the open ocean. This is consistent

with a statement from a Simon Fraser University Think Tank of scientists regarding the management of declining Fraser River Sockeye salmon productivity, who in December 2009, recommended “precautionary measures such as experimentally removing farmed salmon from sockeye migration routes in the short term, even before the federal judicial inquiry is completed”.¹

2. Wild Fish Monitoring Program for Discovery Islands

In order to gain a better understanding of the impacts of sea lice on migrating salmon, we recommend that a wild salmon monitoring program be established in the Discovery Islands region in 2010 during the out migration period. The monitoring program should be DFO-funded and use methodology modeled on fine-scale methods used in the Broughton Archipelago.² The program findings will need to be transparent and fully accessible to independent scientific analysis.

3. Sea Lice Monitoring

Over the long term, sea lice on all BC salmon farms need to be controlled such that sea lice levels (both *Lepeophtheirus salmonis* and *Caligus clemensi*) on adjacent juvenile wild salmon do not exceed natural background levels at any time during the juvenile out-migration periods. An independent and comprehensive, fine-scale wild fish monitoring program² will need to be developed and implemented with funding from the finfish aquaculture industry.

We recommend that a special committee comprised of representatives from First Nations, federal and provincial governments, industry and non-governmental organizations be established now to advise on the design of the long-term monitoring program and the selection of scientist(s) to lead the program. Multi-stakeholder participation in such a committee will be necessary to ensure the program’s findings are fair, independent and verifiable.

We, the undersigned, believe the emergency measures set out in this letter are the minimum actions that are required to protect the most threatened wild salmon stocks through the 2010 migratory period.

We urge you to give this matter your immediate attention. The health and survival of wild salmon, and the people, economies and environment on the west coast that depend them are counting on you, Madam Minister.

Respectfully,

¹ *Adapting to Change: Managing Fraser sockeye in the face of declining productivity and increasing uncertainty*. Statement of Think Tank of Scientists, SFU, Vancouver, December 9th, 2010.

² E.g., Krkosek et al. 2005

Alexandra Morton
David Suzuki Foundation
Georgia Straight Alliance
Living Oceans Society
Outdoor Recreation Council of BC
Raincoast Conservation Foundation
Ritchie Foundation
Save Our Salmon Marine Conservation Foundation
T. Buck Suzuki Environmental Foundation
Watershed Watch Salmon Society
Wilderness Tourism Association

CC. Honourable Steve Thomson, Minister Agriculture and Lands