

May 26, 2014

Open Letter on Flawed DFO Marine Finfish Aquaculture Management Planning Process

Re: Conservation and Environmental Groups Regrettably Decline to Participate in Flawed Fisheries and Oceans Aquaculture Advisory Process.

For the past three years, a number of British Columbia's conservation and environmental non-government organizations (ENGOs) concerned about the impacts of open net-cage salmon farming on wild salmon have struggled to resolve serious deficiencies in the direction, scope and implementation of the Federal Department of Fisheries and Oceans' (DFO) Integrated Management of Aquaculture Planning Process (IMAP)¹.

In December 2010, the federal government assumed primary responsibility for the regulation and management of aquaculture in British Columbia. To carry out these responsibilities, a new set of regulations were developed, the aims of which, according to DFO (IMAP 2013), are to "ensure that the aquaculture industry in BC operates in a sustainable manner, so that the marine environment is protected for future generations." To help support the development of IMAPs and to provide advice to DFO regarding the management and expansion of aquaculture in BC, DFO created 3 segregated advisory processes for freshwater, shellfish and marine finfish aquaculture, dubbed Aquaculture Management Advisory Committees (AMAC). The AMAC terms of reference tout specific goals, objectives, and guiding principles such as "improving Canada's management of aquaculture and performance of the industry from both an environmental and economic standpoint," and "environmental and social sustainability."² ENGOs, among other interests, were invited to participate in the process.

As conservation and environmental organizations, we strongly support more rigorous oversight of the aquaculture industry, better protection of the marine environment, and a legitimate advisory process that might actually help DFO, industry and Canada realize these goals. We also know that a large majority of British Columbians agree with us. Sadly, after three years of meetings and written exchanges with DFO, we were recently notified by DFO that the issues we have raised about the process will not be addressed. Faced with entrenched positions and serious flaws in both the IMAP and AMAC processes, we must decline to participate in this "advisory" process.

Our main concerns around the proposed AMAC terms of reference—and DFO's rigidity against implementing needed changes—lie mainly around the skewed composition of the AMAC's proposed membership, and the absence of any assurance that the process will be informed by sound science advice being made available to AMAC members and DFO regulators.

¹ Pacific Region Marine Finfish Integrated Management of Aquaculture Plan September 2013.

² Marine Finfish Aquaculture Management Advisory Committee (AMAC) Terms of Reference (TOR) Undated (provided in an e-mail on April 23 2014 from Brenda McCorquodale, Senior Aquaculture Management Coordinator, Pacific Region, DFO)

DFO initially proposed AMAC membership would include 9 seats for “industry and industry aquaculture associations”—but only 3 for environmental organizations, and 2 for regional districts. Despite repeated and reasonable requests to improve the balance and input, we were informed in an April 14 2014 letter from Diana Trager, DFO’s Pacific Director of the Aquaculture Management Division, that DFO’s opening offer was also its closing one. Aquaculture planning was to be mainly driven by a heavy industry presence, which does little to inspire confidence that DFO is much interested in giving due consideration to environmental, cultural or social sustainability in its oversight of aquaculture.

DFO also rebuffed calls by us and others to commit to broadening the science advice available to the AMAC. This is a fatal flaw in the process, raising a significant risk that the advisory process will be based on incomplete and potentially biased science advice. For years, the conservation and environmental community, the Public, academics³, First Nations, and most recently, a federal commission into the decline of Fraser River Sockeye, have raised serious concerns that conservation and public interest were being seriously short-changed by “official” government science. Indeed, substantial evidence was tabled throughout the Cohen Inquiry into the Decline of Sockeye Salmon in the Fraser River to support that DFO’s science advice on the impacts of open net-cage aquaculture was overly narrow, often biased, and likely skewed by the Department’s “conflicted” mandate of being both a regulator and promoter of aquaculture.⁴ Justice Cohen took particular pains to make a case that science advice on salmon conservation and aquaculture regulation should be broadened to include outside academics and conservation groups. That advice—not to mention most of the Inquiry’s other aquaculture specific recommendations—have seemingly been forsaken by the federal government in the proposed structure of the AMAC process.

We find this stubborn insistence on filtering and limiting science advice and discovery troubling on many levels. Without non-DFO scientists at the AMAC table, ecological concerns are far more likely to be misconstrued and muted. Moreover, we have little faith that potential impacts from expanding farming operations in the Pacific requiring advice and further research will be properly prioritized, considered, or investigated (e.g. through the allocation of research funding). We also are saddened that the substantial experience non-DFO scientists might otherwise be willing and able to bring to AMAC—on well researched issues such as sea lice and pathogen impacts, siting, and area-based management^{5,6}—will simply not be available to those considering aquaculture management issues.

Our organizations have also raised concerns with the AMAC and IMAP processes constructing “silos” and limiting information exchange, an independent Chair person, how agendas are set, and more.

³ Comment on Beamish et al. (2007) ‘A proposed life history strategy for the salmon louse, *Lepeophtheirus salmonis* in the subarctic Pacific.’ Dill et al. 2008. Aquaculture.

⁴ Cohen Inquiry Highlights: Synopsis of Key Evidence from the Commission of Inquiry into the Decline of Fraser River Sockeye (<http://www.watershed-watch.org/resources/cohen-inquiry-highlights/>)

⁵ Can reduced predation offset negative effects of sea louse parasites on chum salmon? Krkosek et al. 2014. Proc. R. Soc. B 281: 20132913. <http://dx.doi.org/10.1098/rspb.2013.2913>

⁶ Cessation of a salmon decline with control of parasites. Peacock et al. 2013. Ecological Applications.

Furthermore, the Public should be alarmed that DFO has apparently not learned from or deliberately chooses to ignore past mistakes with similar flawed processes, for instance, AquaNet⁷, in which millions of dollars were doled out to a program that collapsed in part because it ignored social and environmental themes. In total, the large number of serious issues—and DFO's unfounded refusal to respond to these concerns by modifying the terms of reference for AMACs—leave us with little choice but to abstain from the process and avoid giving it undue credibility, time, and resources.

Our organizations felt that it is of value to express these concerns by means of this letter to alert others that they may not be well served by the IMAP/AMAC process, and explain why we have concluded that we must remain outside of it. Even while we continued to negotiate these issues in good faith, DFO and Industry almost unilaterally proceeded with the development of and adoption of what they call a "final" Integrated Management of Aquaculture Plan that clearly sets out their own agenda of Industry expansion—absent any real input from any of the other key interests that have been invited to the table.

Of course, if DFO were to respond to and deal with the issues that impair the credibility of this process, we would be willing to participate and lend our expertise and resources. The current model proposed by DFO sadly does little to address our angst or the public's lack of confidence that Canada's incredible natural resources are being adequately respected or protected.

Respectfully,

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⁷ http://www.dfo-mpo.gc.ca/aquaculture/rd2007/rdorg_06-eng.htm