From: 
Sent: Sunday, September 4, 2022 12:39 PM 
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO) 
Subject: 
on line questionnaire

I have just filled in the “Engagement” on line form at:


I wonder why this is being done unless it is a stalling tactic, which the government has been very good at.

What knowledge of the issue is required by any respondents and why would DFO/the government not be concerned about the ignorance of respondents?

Since all the experts - that is the scientists, not the politicians - seem opposed to salmon farms, why is DFO/this government asking the public’s opinion? And why is there no mention in the questionnaire of removing the farms entirely?

Why didn’t DFO/the government follow Recommendation #19 of the Cohen Commission Report and have farms gone by 2020 for a trial, to see if removing them made a difference?

If DFO/the government is concerned about reconciliation with First Nations, why are they not concerned with inland FNs who have treaty rights to fish and hunt and gather? How will they fish when there are no fish? Why is DFO/the government more interested in coastal FN jobs than the welfare (and treaty rights) of inland FNs?

Can DFO/the government provide evidence of 15 years of successful salmon farming anywhere on the planet?

It is more than a little disappointing to have DFO/the government generate this sort of opinion (not fact!) gathering. The questionnaire talked about trust. How can trust be developed when DFO/the government behaves this way?

Sincerely,

s.19(1)
From: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca>
Sent: August 31, 2022 1:47 PM
To: [Redacted]
Subject: RE: Open net-pen or open-net pen

Great questions

This has been debated!
We are going with **open-net pen** as per the Transition Plan Framework for Discussion document:

Cheers!

Brigid

---

From: [Redacted]
Sent: Tuesday, August 30, 2022 3:48 PM
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca>
Subject: Open net-pen or open-net pen

Hello,

A quick (and trivial/esoteric) question.

The consultation hyphenates as “open-net pen aquaculture”. At the DSF we have used “open net-pen” as the hyphenation style.

Do you know which is actually correct? I have tried to find the ‘correct’ version, but have not found any consistent use by experts.

—

The David Suzuki Foundation

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From: [Redacted]
Sent: August 30, 2022 11:50 AM
To: [Redacted]; PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca>
Subject: RE: Public consultation
Hello,

Thank you for sharing this information. We welcome the responses, especially to the online survey as they are particularly helpful to informing the process.

All the very best.

Sincerely,

Aquaculture Management Division
Fisheries Management Branch
Fisheries and Oceans Canada
DFO.PACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca

---

From: [Redacted]
Sent: Monday, August 29, 2022 12:25 PM
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca>
Subject: Public consultation

Hello,

The David Suzuki Foundation will be advising our subscribers to participate in the public consultation in two ways.

1. Offering an online petition that sends messages to this email address. Please keep in mind that this will likely generate several thousand email. We want to ensure that you are prepared for this volume of correspondence.
2. Directing them to the online multiple choice survey.

Please let me know if you have any thoughts or concerns about this approach.

Vancouver, B.C.

---

s.19(1)
From: 
Sent: Monday, October 3, 2022 5:21 PM 
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
Cc: Cyr, Andrea; McCorquodale, Brenda
Subject: Re: Save the Date — DFO Minister Trip October 2022 RE: Net Pen Transition

Thanks, I'll be there.

On Mon, Oct 3, 2022 at 2:05 PM PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO) <DFO.PACAquacultureEngagement-EngagementdelaaquaculturePAC.MPO@dfo-mpo.gc.ca> wrote:

As per the previously shared email, this is a “save the date” invitation to meet with the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard. Logistical details may follow.
On June 22, 2022, Minister Murray announced the next steps on the commitment to transition from open-net pen salmon aquaculture in BC’s coastal waters. The Government of Canada is committed to developing a responsible plan that protects wild Pacific salmon, the environment, and the economy. The transition plan will ensure that finfish aquaculture is conducted in a manner that reduces or eliminates interactions with wild Pacific salmon.
On July 29, 2022, Minister Murray launched the next round of engagement and released a discussion framework, which outlines a proposed vision for open-net pen transition in BC. This will build on previous engagement undertaken by the Department in 2020 and 2021 and take into account the evolution of aquaculture management in response to emerging science and research.
The overarching objective of the roundtables with the Minister of Fisheries, Oceans and the Canadian Coast Guard is to advise DFO of key considerations in the development of a Transition Plan for finfish aquaculture in BC.

Brenda McCorquodale (she/ her/ elle)

Director / Directrice
Aquaculture Management / Gestion de l’aquaculture
Fisheries Management Branch / Direction de la gestion des pêches
Fisheries and Oceans Canada / Pêches et Océans Canada
1965 Island Diesel Way | Nanaimo, BC | Nanaimo, CB | V9S 5W8
250-902-8865
Email | Courriel: Brenda.McCorquodale@dfo-mpo.gc.ca
Dear Minister Murray,

I am extremely sorry I can’t attend your meeting in Campbell River due to a conflicting Board meeting. As the ONLY elected representative for the Discovery Islands I would be remiss in not at least sending in written comments. Please see below. I have been on the Transition Team with Terry Beech and Fin Donally for the past year and hope you will accept these comments as the wishes of those that I represent.

I don’t envy your task but feel it essential that these farms be removed as has been committed to for the health of our wild salmon.

Thank you for listening and I wish you well. I am sure we will meet again as we have in the past.

Jim Abram

SURVEY COMMENTS

FISH FARMS OUT OF THE DISCOVERY ISLANDS

The removal of all fish farms from the Discovery Islands and Mainland Inlets, SRD Area C, is imperative for the health and survival of migrating wild salmon of many river systems on the coast of British Columbia.

Any remaining sites or infrastructure should be removed permanently as soon as possible, and not be permitted ever again.

The removal of fish farms from the Okisollo Channel has resulted in this year’s runs of out-migrating juvenile wild salmon being virtually lice free and healthy looking for the first time since fish farms arrived in these waters over 30 years ago.

The waters of the Okisollo Channel, are clearer than they have been since the fish farms first arrived here. Good runs of multiple species of adult wild salmon are returning to their rivers right now. There are more herring,
more sea bird and marine mammal activity in the
waters surrounding the Discovery Islands than
there has been in decades. I believe this is not
a mere coincidence but is linked to the removal
over the past several years of the Discovery
Island fish farm sites.

The overwhelming majority of the constituents of
Area C, (Discovery Islands and Mainland
Inlets), as well as many more in the rest of
the Strathcona Regional District and the rest of
the province of British
Columbia (including most First Nations) are
very happy to see the end of open net pen
salmon farming in the Discovery Islands and
the Broughton Archipelago and believe that the
rest of the coast of BC would
benefit enormously by the complete removal of
these fish farms which do very little to support
the local economy in relation to the pollution,
parasites and pathogens inflicted upon wild
salmon and their habitat.

Fish farms in BC should be out of the water, but
not just out of the water. They should
be totally closed containment systems, so no
raw effluent can possibly end up in open fresh
or salt water. They should be situated close to
the actual market, on already industrialized
land, close to the processing plants, close to
sources of transportation, grid-power,
and workers, not in beautiful, remote,
wilderness settings that have other, more
broadly valuable uses, and where the cost of
open net pen activity has been borne by the
fragile ecosystems of the natural
environment in which they have been
situated for over 30 years.

It has been noticed by a number of constituents
that wherever there was once a fish farm, either in the Discovery Islands, or the Broughtons, there is very often some form of garbage left behind by the fish farm company that previously occupied the site. Old floats, ropes, plastic pipe, styro-foam, anchor buoys, old broken parts of pens, totes, old telecom satellite dishes etc. seem to be left behind, here and there, in the wake of the departing fish farm. I wonder what plans the companies have to completely remediate these former fish farm sites?

When the fish farms first appeared on the BC coast, there was no consultation process in place at all; licenses were issued and the fish farms simply appeared on the scene, most of them small Ma and Pa operations to begin with. The small companies were soon bought out by the large Norwegian companies and would become the huge multi-nationals that operate on a global scale today.

As time went on and the detrimental effects to the environment and wild salmon stocks became known and understood, the constituents of Area C voiced their concerns loudly and clearly. Whenever these companies applied for re-zoning to allow expansion of their industry in Area C, their proposals were soundly rejected by the constituency through the public hearing process. Clearly the constituents, residents and taxpayers of Area C did not want salmon farming to occupy the marine waterways of the Discovery Islands and Mainland Inlets.

The damage to the wild salmon economy (which includes eco-tourism, wildlife viewing
operations, the sports fishing industry as well as First Nations’ and other locals’ food and commercial fishery of wild salmon) is unacceptable.

Simply put, the wild salmon economy is of vital importance to the constituents of Area C, Discovery Islands and Mainland Inlets and their way of life. By eliminating salmon farms from the Discovery Islands’ wild salmon migration corridor, wild Pacific salmon of all species, from multiple runs all along the south coast of British Columbia, now have a fighting chance of recovery and restoration.

The folks I represent, as well as many more from across the province of BC, recognise the importance of the decision to get fish farms out of the water; they do not wish to see salmon farms operating in these waters again. Legislation needs to be put in place to ensure wild salmon continue to have fish farm-free migration routes through the Discovery Islands for all time.

Jim Abram
Director, Discovery Islands-Mainland Inlets
Strathcona Regional District
From: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-Engagement delaquaculturePAC.MPO@dfo-mpo.gc.ca>
Sent: Tuesday, October 4, 2022 11:39 AM
To: Stern, Laura <Laura.Stern@dfo-mpo.gc.ca>
Subject: FW: Save the Date – DFO Minister Trip October 2022 RE: Net Pen Transition

Please add to the Correspondance tracker.
Thanks!

From: McCrorquodale, Brenda <Brenda.Mccrorquodale@dfo-mpo.gc.ca>
Sent: Tuesday, October 4, 2022 11:37 AM
To: Jesse Ketler <councillor.ketler@cumberland.ca>; PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO) <DFO.PACAquacultureEngagement-Engagement delaquaculturePAC.MPO@dfo-mpo.gc.ca>; Andrew.adams@campbellriver.ca; bunger@goldriver.ca; dlaw@tofino.ca; ddugas@porthardy.ca; ian.morrison@cvrd.bc.ca; ahory@rdmw.bc.ca; info@scrd.ca; shelleydowney@portmcneill.ca; planning@ncrdb.com
Cc: Cyr, Andrea <Andrea.Cyr@dfo-mpo.gc.ca>
Subject: RE: Save the Date – DFO Minister Trip October 2022 RE: Net Pen Transition

That is totally my oversight – our apologies. There is very little flexibility in terms of when the Minister is available to meet folks face-to-face and we were trying to fit in this important group. The municipal election date totally slipped my mind. We will try to organize an alternative for virtual attendance in the coming weeks.
In the meantime we would still appreciate your RSVPs and we will see if we have enough folks to go ahead with this time for a face-to-face.
Once again I take responsibility for insensitivity of that timing. My apologies.
Brenda

Brenda McCrorquodale (she/ her/ elle)
________________________________________________________

Director / Directrice
Aquaculture Management / Gestion de l’aquaculture
Fisheries Management Branch / Direction de la gestion des pêches
Fisheries and Oceans Canada / Pêches et Océans Canada
1965 Island Diesel Way | Nanaimo, BC | Nanaimo, CB | V9S 5W8
250-902-8865
Email | Courriel: Brenda.Mccrorquodale@dfo-mpo.gc.ca

From: Jesse Ketler <councillor.ketler@cumberland.ca>
Sent: Tuesday, October 4, 2022 11:19 AM

000009
Hello Brenda,

I appreciate the invitation and opportunity to provide feedback but it seems completely inappropriate to hold the meeting 3 days before local elections. Some officials are not running and we are all currently outside our mandates. Why not wait a few weeks so that all the people at the table are accountable for the next 4 years?

Thank you,
Jesse

Jesse Ketler

Chair/Director - COMOX VALLEY RD

Councillor - VILLAGE OF CUMBERLAND

Cell: [phone number]

Email: councillor.ketler@cumberland.ca

I acknowledge the unceded, traditional territory of the K’omoks Nation on which I live, work and play.

From: PAC Aquaculture Engagement / Engagement de laaquaculture PAC (DFO/MPO)
<DFO.PACAquacultureEngagement-Engagement delaquaculturePAC.MPO@dfo-mpo.gc.ca>

Sent: October 3, 2022 3:47 PM

To: Andrew.adams@campbellriver.ca <Andrew.adams@campbellriver.ca>; bunger@goldriver.ca <bunger@goldriver.ca>; dlaw@tofino.ca <dlaw@tofino.ca>; ddugas@porthardy.ca <ddugas@porthardy.ca>;
ian.morrison@cvrd.bc.ca <ian.morrison@cvrd.bc.ca>; ahory@rdmw.bc.ca <ahory@rdmw.bc.ca>; info@scrd.ca <info@scrd.ca>;
Jesse Ketler <councillor.ketler@cumberland.ca>; shelleydowney@portmcneill.ca <shelleydowney@portmcneill.ca>; planning@ncrdbc.com <planning@ncrdbc.com>

Cc: Cyr, Andrea <Andrea.Cyr@dfo-mpo.gc.ca>; McCaul, Brenda <Brenda.McCaul@dfo-mpo.gc.ca>

Subject: Re: Save the Date – DFO Minister Trip October 2022 RE: Net Pen Transition

When: October 12, 2022 2:40 PM-3:55 PM.
Where: Campbell River Maritime Heritage Center

Good afternoon,

As per the previously shared email, this is a “save the date” invitation to meet with the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard.

On June 22, 2022, Minister Murray announced the next steps on the commitment to transition from open-net pen salmon aquaculture in BC’s coastal waters. The Government of Canada is committed to developing a responsible plan that protects wild Pacific salmon, the environment, and the economy. The transition plan will ensure that finfish aquaculture is conducted in a manner that reduces or eliminates interactions with wild
Pacific salmon.

On July 29, 2022, Minister Murray launched the next round of engagement and released a discussion framework, which outlines a proposed vision for open-net pen transition in BC. This will build on previous engagement undertaken by the Department in 2020 and 2021 and take into account the evolution of aquaculture management in response to emerging science and research.

The overarching objective of the roundtables with the Minister of Fisheries, Oceans and the Canadian Coast Guard is to advise DFO of key considerations in the development of a Transition Plan for finfish aquaculture in BC.

Brenda McCorquodale (she/ her/ elle)

________________________

Director / Directrice
Aquaculture Management / Gestion de l’aquaculture
Fisheries Management Branch / Direction de la gestion des pêches
Fisheries and Oceans Canada / Pêches et Océans Canada
1965 Island Diesel Way | Nanaimo, BC | Nanaimo, CB | V9S 5W8
250-902-8865
Email | Courriel: Brenda.McCorquodale@dfo-mpo.gc.ca
This is an extremely biased survey
evidently designed to provide government
with justification to perpetuate fish farming.
Setting up permanent institutions
to study, regulate, and collaborate on fish farming
merely ensures perpetual fish farms.
Calling for more study and metrics
ensures more fish farming to be studied.
Calling for more First Nations consultation
(which government and industry have never yet taken seriously)
is just an excuse for further fish farming.

This is a truly disgusting survey.
It could have been
and may well have been
authorized by corporate fish farms.

Stop this political manipulation
and do what the First Nations,
the BC citizens, and the earth have been demanding:
just end marine fish farming
while there is still a wild population to protect!

Sincerely,

--

There are some things that are not for sale.
Some things belong to all of us.
- Grey Owl

s.19(1)
From: 
Sent: Wednesday, October 12, 2022 5:04 AM 
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO) 
Subject: Comments re: salmon farm transition

DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,
Get these poison pits out of the West coast waters.

Now.
Who is the 'boss' here? Do your jobs as promised and get the lice ridden suffering penned salmon OUT of the ocean.

s.19(1)
From:  
Sent: Tuesday, October 18, 2022 7:48 PM  
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC  
(DFO/MPO)  
Subject: All fish farms need to be removed from the ocean

Greetings,

Ms. Murray and Mr Ladell,

There is no room for fish farming in B.C. ...not on land nor in the water. Wild salmon plus thousands of other living species depend upon the migration and flourishing of wild salmon in our waters. Fish farms are destroying the integrity of the habitat for our wild species like herring, cod, etc. chemicals, pollution, parasites, toxic waste, noise, lights and more are destroying wild salmon smolts, young herring, cod, halibut and a myriad of other life forms like our shellfish and trout. Starving bears, eagles, wolves and more have depended upon wild fish in our rivers for survival, everything is connected. You are impoverishing the coast by your actions of permitting fish farming in our waters. Nature provided a blueprint for the health and well being of us all. It is not too late to reverse the plummeting numbers of wild salmon and wildlife, reverse these policies and get fish farming out of our coastal waters and everywhere. ASAP, sincerely, 

______________________________

in Clayoquot Sound, where the highest concentration of fish farms exist on the coast of North America. They stink, are never quiet with bright lights on 24/7. They pollute, create disease, harm, pollution and destroy our wild species. They are overall a tragedy and the influx of imported escaped Atlantic salmon in our waters is causing irreversible harm.DFO should be charged with importing invasive species into B.C. At least Alaska has had the sense to prohibit them. Send them and their chemical poison barges and floating junk and garbage back to Norway. We don’t want them!

Your report states that “wild Pacific salmon are at risk of disappearing forever if we don’t act”. It is clear to me that open-net pens are harming everything.

There are no in-water fish farm technologies which protect wild salmon. Compromises and half-measures at this late stage are simply unacceptable. Wild salmon don’t have time to wait.

Please get to work to remove salmon farms from BC waters as soon as possible, the longer you procrastinate, the more we are losing.

Sincerely,

______________________________

s.19(1)

Regards,
From:  
Sent: Tuesday, October 18, 2022 8:30 PM  
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)  
Subject: In regards to salmon farming transition

DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,

I have been in business for over ___ years on the BC coast and our company, employing ___ people, depends on the survival of wild salmon! British Columbia’s wild salmon drive recreational fishing industries and wilderness tourism. They’re integral to aboriginal culture. Ocean-based factory fish farms threaten wild salmon and everyone that depends on them. Open-net salmon farms amplify parasites, viruses and bacteria and spread them to wild salmon, according to numerous peer-reviewed scientific studies published in independent journals. I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

The current federal government committed to transitioning open-net salmon farms by 2025. I expect them to do so without delay or half-measures. In recent DFO communications, semi-closed containment salmon farms have been mentioned as a possible solution or avenue for the transition despite any publicly available evidence that shows this technology is viable. Progressively minimizing or eliminating interactions between farm and wild salmon has also been touted by the federal government as a solution. We don’t have time for a protracted transition period. The open-net salmon farming industry had decades to clean-up their act. It’s time for them to transition completely out of coastal B.C. waters.

Another half-measure being touted by DFO as a solution is known as area based aquaculture management. This vague term suggests some unknown level of communication or coordination among open net salmon farms in a region will protect wild salmon. The time for stalling is over. All open net salmon farms must be removed by no later than 2025.

In addition, the open-net salmon farm transition should not just focus on shifting fish farm workers to another form of aquaculture. The transition should include shifting workers to other fields of employment that are currently in great need in British Columbia.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

Thank you.
Dear Fisheries & Oceans Canada,

Fish pens were a bad idea to begin with. No pens are good. Any pens are bad.

Get rid of them ASAP!!!

Sincerely,
From: 
Sent: Wednesday, October 19, 2022 12:45 AM
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)
Subject: Fish Farm Survey

Dear Staff,

I am writing because I was very disappointed by the biased and crafty wording used in the survey about fish farms that is currently open to the public. There are many questions that lump ideas about investing more into fish farms in with questions about investing in land based aquaculture. As we have seen from the DFO's last report on the subject, the government is trying to back away from its commitment to end licenses for marine fish farms by 2025. This survey is clearly poorly worded with the intention of garnering support to break this promise. The DFO must end marine fish farms as promised or your organization will be responsible for overseeing the destruction of a keystone species.

Sincerely,

s.19(1)
From:
Sent: Wednesday, October 19, 2022 1:13 AM
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)
Subject: In regards to salmon farming transition

DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,
This was a very bad year for salmon with the drought hitting so hard during spawning time. With so few getting to the spawning grounds 2024 will be critical for some salmon varieties and 2026 will be critical for another. British Columbia’s wild salmon drive recreational fishing industries and wilderness tourism. They’re integral to aboriginal culture. Ocean-based factory fish farms threaten wild salmon and everyone that depends on them. Open-net salmon farms amplify parasites, viruses and bacteria and spread them to wild salmon, according to numerous peer-reviewed scientific studies published in independent journals. I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

The current federal government committed to transitioning open-net salmon farms by 2025. I expect them to do so without delay or half-measures. In recent DFO communications, semi-closed containment salmon farms have been mentioned as a possible solution or avenue for the transition despite any publicly available evidence that shows this technology is viable. Progressively minimizing or eliminating interactions between farm and wild salmon has also been touted by the federal government as a solution. We don’t have time for a protracted transition period. The open-net salmon farming industry had decades to clean-up their act. It’s time for them to transition completely out of coastal B.C. waters.

Another half-measure being touted by DFO as a solution is known as area based aquaculture management. This vague term suggests some unknown level of communication or coordination among open net salmon farms in a region will protect wild salmon. The time for stalling is over. All open net salmon farms must be removed by no later than 2025.

In addition, the open-net salmon farm transition should not just focus on shifting fish farm workers to another form of aquaculture. The transition should include shifting workers to other fields of employment that are currently in great need in British Columbia.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

Thank you.
From: [Redacted]
Sent: Wednesday, October 19, 2022 10:24 AM
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
Subject: Salmon farming transition comments

DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,

I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

Thank you.

s.19(1)
From:  
Sent: Thursday, October 20, 2022 12:37 PM  
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC  
(DFO/MPO)  
Subject: DFO salmon aquaculture survey skews public input

Dear Fisheries and Oceans Canada,

It's late trying to save BC wild salmon. Now it takes everything that can be done to keep them from disappearing. Eliminating open salmon net pens from the coast must be done without delay.

Sincerely,

s.19(1)
Dear Fisheries and Oceans Canada,

I’m very concerned with the public consultation currently underway for the Salmon Aquaculture Transition Plan. I find the DFO’s multiple-choice survey to be predicated on the assumption that ocean-based salmon farms are here to stay and so designed that I cannot express my opinion on the content of a transition plan that would meet my expectations of the government’s promise to ‘transition open-net pens from B.C. waters by 2025’.

Below, I share with you my views on the identified objectives for the Transition Plan. I can summarize them briefly by saying I expect open-net pens to be removed by 2025 and I will not accept that measures supposed to reduce harm are adequate. There is no regulatory measure or marine-based technology in existence that can protect wild salmon from the disease, sea lice and pollution of salmon farms: if they’re ‘semi-closed’, they’re ‘still open’. Far too many wild salmon populations are threatened or endangered for harm reduction approaches: they need the elimination of harm at the earliest possible moment.

I ask you, as my representative, to ensure that the government follows through on its promise and removes open-net pen salmon farms by 2025.

Objective 1: Transition from open-net pen aquaculture.

I cannot stress enough that so-called “semi-closed”, “hybrid” and “offshore” salmon farms will not meet the government’s commitment, will not protect wild salmon and will not satisfy voters like me, who believe that the government has committed to protect wild salmon from salmon farms. All of these technologies continue to depend on open-net pens to grow salmon to market size.

There are no policy or management measures that can possibly regulate the sea lice, disease pathogens and pollution that flow freely from open-net pens; and there is no technology commercially available that can protect wild salmon from the impacts of farm effluent. That said, it would be a very good idea to appoint third-party observers to the farms, to ensure that Conditions of Licence continue to be observed during final production cycle’s growout and decommissioning of the farms.

Many salmon populations in B.C. are so severely depressed that they may become extinct if the harm caused by net pens is not eliminated — measures aimed at reducing harm will be too little, too late. The timeline for eliminating the farms was set by government already: 2025. I expect all salmon farms to be removed by that time.

I would like to see capacity preserved for shellfish and seaweed aquaculture, with a management regime that empowers First Nations to steward their territories effectively, within a regulatory regime that protects biodiversity and ecological integrity in aquaculture practices. DFO should concentrate on developing an appropriate regulatory regime and government support should focus on helping First Nations, communities and displaced salmon farm workers to take part in regenerative aquaculture, habitat restoration, monitoring and enforcement with a view to rebuilding the wild salmon economy of our coast.

s.19(1)
Ultimately, I would like to see “a transformed aquaculture sector in B.C. which [completely] moves away from [marine-based] salmon and focuses on land-based, shellfish, or marine plant culture”.

Objective 2: Trust and transparency

The DFO requires a complete overhaul of the manner in which science advice is created and applied. Transparency alone will be insufficient to cure the distrust that decades of denial, suppression and mismanagement have created. The sole focus of DFO science should be the restoration of wild fish populations through the implementation of ecosystem-based management and it clearly is not so focused today.

Public accountability for the implementation of the transition plan will be extremely important, as will an enhanced role for coastal and First Nations communities in the regulation, monitoring and enforcement for any future regenerative (i.e., seaweed, shellfish) aquaculture activities.

Objective 3: Reconciliation and Indigenous partnerships

Reconciliation with First Nations should include restoring to all Nations access to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the interior of BC, who have suffered the loss of Fraser and Thompson River salmon, in particular. Given the migratory nature of salmon, no First Nation can claim that reconciliation demands that they be permitted to continue farming salmon in open-net pens - to the continued detriment of wild salmon, as well as the rights of the many First Nations along salmon migration routes who oppose salmon farming operations due to their impacts to the wild salmon they depend on.

Recognizing that a number of First Nations have profited from permitting salmon farms in their territories and that government has permitted and encouraged this to take place, government’s focus now should be on finding out what those Nations want to do to replace the jobs and revenue that salmon farm companies provided. Support for alternative economic development should be included in the Transition Plan.

Objective 4: Growth in B.C. sustainable aquaculture innovation

For fully 10 years, Norway has been encouraging innovation in ocean-based salmon farming, yet the Norwegian-based companies that farm B.C. waters have failed to find a sustainable and commercially viable method of growing salmon to market size in an ocean-based tenure. None of the experimental technology even begins to address the transmission of farm-introduced or farm-amplified pathogens, which we now know to be having population-level impacts to wild Pacific salmon. So, no; I do not believe that technological innovation in ocean tenures is going to prevent harm to wild salmon.

The Transition Plan should focus on creating an appropriate regulatory framework for land-based recirculating aquaculture facilities and shellfish and seaweed farming. It should streamline applications processes and ensure that local capacity for monitoring and enforcement is enhanced, whether by First Nations or other coastal communities hosting such facilities.

As indicated above, I am adamantly opposed to so-called ‘semi-closed’, ‘hybrid’ and ‘offshore’ production systems, all of which are still dependent on open-net pens; and so I oppose the idea of a Transition Plan that would include any support for developing such systems. I would, however, approve of tax incentives for investment in land-based or regenerative aquaculture. Unfortunately, the public survey was so designed as to make this distinction impossible.

In summary: Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based
technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,

s.19(1)
From: 
Sent: Thursday, October 20, 2022 1:25 PM 
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO) 
Subject: I clearly say, get fishfarms fully ashore and stop the pollution of my wild salmon

It won't be easy or cheap, but wild salmon hold more promise of higher profits, so tell the foreign polluters to pack up and go home.

s.19(1)
From: 
Sent: Thursday, October 20, 2022 1:30 PM
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)
Cc: 
Subject: Get the fishfarms out of BC waters.

I volunteer for wild salmon and I don't want some foreign polluters killing my slon enhancement efforts. Wild salmon command a much higher market value, no antibiotics, dyes, fungicides added. So even if it's hard and not cheap, get those fishfarms ENTIRELY out of BC waters.

s.19(1)
DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,

Ocean-based factory fish farms threaten wild salmon and everyone that depends on them. Open-net salmon farms amplify parasites, viruses and bacteria and spread them to wild salmon, according to numerous peer-reviewed scientific studies published in independent journals. I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

The current federal government committed to transitioning open-net salmon farms by 2025. I expect them to do so without delay or half-measures. In recent DFO communications, semi-closed containment salmon farms have been mentioned as a possible solution or avenue for the transition despite any publicly available evidence that shows this technology is viable. Progressively minimizing or eliminating interactions between farm and wild salmon has also been touted by the federal government as a solution. We don’t have time for a protracted transition period. The open-net salmon farming industry had decades to clean-up their act. It’s time for them to transition completely out of coastal B.C. waters.

Another half-measure being touted by DFO as a solution is known as area based aquaculture management. This vague term suggests some unknown level of communication or coordination among open net salmon farms in a region will protect wild salmon. The time for stalling is over. All open net salmon farms must be removed by no later than 2025.

In addition, the open-net salmon farm transition should not just focus on shifting fish farm workers to another form of aquaculture. The transition should include shifting workers to other fields of employment that are currently in great need in British Columbia.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

As a society and a species, we need to work to transition away from eating animal protein. Not only does fishing harm individuals, it is destroying the ocean ecosystem. The majority of people in the world do not need to eat fish. Your ministry would do well too educate people on the harm that fishing does and help people transition away to plant-based alternatives.

Thank you.
From: 
Sent: Thursday, October 20, 2022 3:29 PM 
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO) 
Cc: Joyce Murray MP (DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca); Justin.Trudeau@parl.gc.ca 
Subject: Living Oceans report Oct 11 

Follow Up Flag: Follow up 
Flag Status: Completed 

DFO aquaculture engagement. 

I’ve attempted to complete the recent survey on salmon pens, but it is almost impossible not to be forced into choosing answers I dislike – so I’ve left much blank. Many questions seem to be worded assuming open ocean or hybrid open fish farming continues. 

**Prime Minister Justin Trudeau** announced an objective to *transition away* from open pens, but it looks like your ministry is looking for any *other* outcome.....meanwhile we are going the way of the COD fishery. 

**Living Oceans today released** a report detailing why British Columbia’s salmon farms have to come out of the water. “There is no technology in use or development today for farming salmon in the ocean that would protect wild salmon,” said The report expands on a video released last week by Clayoquot Action, that explains the failure last year of a “semi-closed” salmon farming system that was trialed in Clayoquot Sound..... October 11th 2022 

Yours truly,
s.19(1)

No further information has been severed or removed from this page
From:          
Sent:  Friday, October 21, 2022 9:55 PM
To:  PAC Aquaculture Engagement / Engagement de laquaculture PAC  
      (DFO/MPO)
Subject:  There is no future for marine-based salmon aquaculture in BC!

Just to start off even before your names... It is 100% your responsibility to take care of everything that lives in the ocean waters. You are supposed to be the stewards and taking care. Screw all your policies allowing commercial fisherman and what have you to do their thing. Take care of the fish. Quit filling your pocketbooks. To the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard (DFO):

*This letter is intended to form part of your public consultation process “Discussion framework for a BC aquaculture open-net pen transition plan”.

I write to urge you to keep your government’s promise to create “a responsible plan to transition from open-net pen salmon farming in coastal B.C. waters by 2025.” and to implement a transition plan that is centred on the conservation of wild pacific salmon and that includes:

A clear deadline for the removal of all open-net salmon farms in BC waters by 2025 or earlier;

A clear plan by which this removal will be achieved.

A statement that makes it clear that other in-water salmon aquaculture technologies, such as semi-closed or hybrid, will also not be permitted after the set deadline.

I have refrained from engaging in the public survey your department is currently running on this issue because I believe it is misleading and vague on its intentions. The survey uses misleading terminology, fails to define what type of salmon aquaculture is being referred to and the written feedback section reduces my ability to outline my concerns and suggestions to a space of only 140 characters to answer six or more questions.

Therefore, I find it difficult to answer without unintentionally supporting harmful in-water systems that will not address the major impacts current fish farms are having on wild pacific salmon populations.

The lack of transparency and potential hidden intentions behind this survey are extremely worrisome for me and the 75% percent of British Columbians that are in favour of removing any type of salmon aquaculture from BC waters (Insights West Poll 2021) and do not help to rebuild the trust lost on DFO’s processes around this issue.

- Wild Pacific salmon are in crisis and action is needed now. This transition plan needs to centre the recovery and conservation of pacific wild salmon stocks.

- The only proven technology known to fully eliminate interactions between farmed and wild fish is land-based aquaculture. Any other technologies will fail to accomplish this and continue to put wild salmon at risk.

- The government must engage authentically with coastal communities to mitigate the potential job losses, and create a community based plan to support individuals currently in the industry.

- The objectives and tactics around this transition plan need to be centred on the full implementation of UNDRIP.

s.19(1)
I fully trust that as the Minister of the department, you intend to do the right thing for the fragile populations of wild pacific salmon, as well as for the people that depend on them. I believe that the time to take leadership is now and the only person that can do that is you.

The only way forward is with open-net salmon aquaculture out of BC waters by 2025 at the latest.

s.19(1)
From: [Redacted]
Sent: Saturday, October 22, 2022 3:45 PM
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)
Subject: Re: Survey - Salmon Aquaculture does not belong in the ocean.

Greetings,

Dear Neil Ladell,

Dear Honorable Minister:
Please do what you said you were going to do and remove all fish farms from British Columbia waters. On land closed system is the only realistic alternative and if the fish farmers say they are not ready they should have thought about that 10 years ago.
Please separate yourself from Stephen Harper, his horrible influence still lasts.

Sincerely,

[Redacted]

Regards,
Dear Minister Murray et al

Please accept the following as my submission as the ONLY elected Local Govt rep for the Discovery Islands.

I apologize for not being able to attend the meeting you invited me to in Campbell River. Please accept this as my submission to that day’s proceedings.

Thank you

Jim Abram
Director, Discovery Islands
Strathcona Regional District.
FISH FARMS OUT OF THE DISCOVERY ISLANDS

- The removal of all fish farms from the Discovery Islands and Mainland Inlets, SRD Area C, is imperative for the health and survival of migrating wild salmon of many river systems on the coast of British Columbia.

- Any remaining sites or infrastructure should be removed permanently as soon as possible, and not be permitted ever again.

- The removal of fish farms from the Okisollo Channel has resulted in this year’s runs of out-migrating juvenile wild salmon being virtually lice free and healthy looking for the first time since fish farms arrived in these waters over 30 years ago.

- The waters of the Okisollo Channel, are clearer than they have been since the fish farms first arrived here. Good runs of multiple species of adult wild salmon are returning to their rivers right now. There are more herring, more sea bird and marine mammal activity in the waters surrounding the Discovery Islands than there has been in decades. I believe this is not a mere coincidence but is linked to the removal over the past several years of the Discovery Island fish farm sites.

- The overwhelming majority of the constituents of Area C, (Discovery Islands and Mainland Inlets), as well as many more in the rest of the Strathcona Regional District and the rest of the province of British Columbia (including most First Nations) are very happy to see the end of open net pen salmon farming in the Discovery Islands and the Broughton Archipelago and believe that the rest of the coast of BC would benefit enormously by the complete removal of these fish farms which do very little to support the local economy in relation to the pollution, parasites and pathogens inflicted upon wild salmon and their habitat.

- Fish farms in BC should be out of the water, but not just out of the water. They should be totally closed containment systems, so no raw effluent can possibly end up in open fresh or salt water. They should be situated close to the actual market; on already industrialized land, close to the processing plants, close to sources of transportation, grid-power, and workers, not in beautiful, remote, wilderness settings that have other, more broadly valuable uses, and where the cost of open net pen activity has been borne by the fragile ecosystems of the natural environment in which they have been situated for over 30 years.

- It has been noticed by a number of constituents that wherever there was once a fish farm, either in the Discovery Islands, or the Broughtons, there is very often some form of garbage left behind by the fish farm company that previously occupied the site. Old floats, ropes, plastic pipe, styro-foam, anchor buoys, old broken parts of pens, totes, old telecom satellite dishes etc. seem to be left behind, here and there, in the wake of the departing fish farm. I wonder what plans the companies have to completely remediate these former fish farm sites?

- When the fish farms first appeared on the BC coast, there was no consultation process in place at all; licenses were issued and the fish farms simply appeared on the scene, most of them small Ma and Pa operations to begin with. The small companies were soon bought out by the large Norwegian companies and would become the huge multi-nationals that operate on a global scale today.

- As time went on and the detrimental effects to the environment and wild salmon stocks became known and understood, the constituents of Area C voiced their concerns loudly and clearly. Whenever these companies applied for re-zoning to allow expansion of their industry in Area C,
their proposals were soundly rejected by the constituency through the public hearing process. Clearly the constituents, residents and taxpayers of Area C did not want salmon farming to occupy the marine waterways of the Discovery Islands and Mainland Inlets.

- The damage to the wild salmon economy (which includes eco-tourism, wildlife viewing operations, the sports fishing industry as well as First Nations’ and other locals’ food and commercial fishery of wild salmon) is unacceptable.

- Simply put, the wild salmon economy is of vital importance to the constituents of Area C, Discovery Islands and Mainland Inlets and their way of life. By eliminating salmon farms from the Discovery Islands’ wild salmon migration corridor, wild Pacific salmon of all species, from multiple runs all along the south coast of British Columbia, now have a fighting chance of recovery and restoration.

- The folks I represent, as well as many more from across the province of BC, recognise the importance of the decision to get fish farms out of the water; they do not wish to see salmon farms operating in these waters again. Legislation needs to be put in place to ensure wild salmon continue to have fish farm-free migration routes through the Discovery Islands for all time.
DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,

Before you read my letter, below, I need you to recognize that we are not JUST discussing wild salmon here! Every other animal that depends on salmon, in every ocean on the planet, is being detrimentally affected by open-pen fish farms! We CANNOT ignore the brevity of this situation! There is NO OTHER CHOICE but to get these fish farms out of the ocean NOW! We owe it to the planet to do the right thing! Those who presently work on fish farms can be employed in land-based farms! We MUST END the devastation happening, no matter how strongly the fish farmers make their appeals! The planet’s health us MORE IMPORTANT! GET THEM OUT NOW! Don’t even wait until 2025!!!

British Columbia’s wild salmon drive recreational fishing industries and wilderness tourism. They’re integral to aboriginal culture. Ocean-based factory fish farms threaten wild salmon and everyone that depends on them. Open-net salmon farms amplify parasites, viruses and bacteria and spread them to wild salmon, according to numerous peer-reviewed scientific studies published in independent journals. I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

The current federal government committed to transitioning open-net salmon farms by 2025. I expect them to do so without delay or half-measures. In recent DFO communications, semi-closed containment salmon farms have been mentioned as a possible solution or avenue for the transition despite any publicly available evidence that shows this technology is viable. Progressively minimizing or eliminating interactions between farm and wild salmon has also been touted by the federal government as a solution. We don’t have time for a protracted transition period. The open-net salmon farming industry had decades to clean-up their act. It’s time for them to transition completely out of coastal B.C. waters.

Another half-measure being touted by DFO as a solution is known as area based aquaculture management. This vague term suggests some unknown level of communication or coordination among open net salmon farms in a region will protect wild salmon. The time for stalling is over. All open net salmon farms must be removed by no later than 2025.

In addition, the open-net salmon farm transition should not just focus on shifting fish farm workers to another form of aquaculture. The transition should include shifting workers to other fields of employment that are currently in great need in British Columbia.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

Thank you.

s.19(1)
Greetings,

Dear Minister Joyce Murray,

I truly pray that you and DFO will still be removing Open Net Pen Salmon Farms by 2025 at the latest. I read that this is possibly not happening anymore. I fish the waters around Victoria and I have seen the damage these fish farms do to our wild populations. Please, please let's stay on track to remove all of these farms before it is too late, and it almost is too late in some areas like Clayoquot Sound.

Thanks for your time,

Regards,
Greetings,

Dear Neil Ladell,

Okay I’m leaving the prewritten response down below but I want to add and clarify that I am actually an Ontarian who as a member of the university of Guelph where we studied the salmon farming situation and the harms vs benefits it brought to the community. In effect, these salmon farms provide short term gains while risking serious long term damage.

Have some courage and some honour. For once as politicians, do not take the short cut. Find a way to utilize and respect the deep ecological knowledge of the local indigenous populations and their generations of stewardship wisdom.

And then do the same for your forestry issue because it is also contributing to the wild salmon population reduction.

Thank you for listening and good luck, you need it.

I’m writing today regarding the development of a plan to ‘transition from open net-pen salmon farming in coastal BC waters by 2025’.

Because your online survey has a pre-determined outcome (fish farms will remain in BC waters indefinitely), I’ve chosen to send this email instead.

I am one of the 75% of British Columbians who want fish farms removed from ocean waters. I support over 100 First Nations who are calling for this as well.

Your report states that “wild Pacific salmon are at risk of disappearing forever if we don’t act”. It is clear to me that open-net pens are harming wild salmon by spreading deadly pathogens, parasites and pollution.

Land-based systems are being built around the world right now, while floating in-water systems will require up to 5 years of further review.

There are no in-water fish farm technologies which protect wild salmon. Compromises and half-measures at this late stage are simply unacceptable. Wild salmon don’t have time to wait.

Please get to work developing the plan to remove salmon farms from BC waters by 2025.

Sincerely,

s.19(1)

Regards,
Dear Fisheries and Oceans Canada,

Oh, boy (sigh)! Another letter on this never ending issue of getting rid of the toxic factory salmon farms currently polluting BC waters. I write to you again to express my EXTREME DISSATISFACTION with the public consultation currently underway for the Salmon Aquaculture Transition Plan. I find the DFO’s multiple-choice survey to be predicated on the assumption that ocean-based salmon farms are here to stay and so designed that I cannot express my opinion on the content of a transition plan that would meet my expectations of the government’s promise to ‘transition open-net pens from B.C. waters by 2025’.

On October 12 I was part of a group of people demonstrating outside the meetings in Campbell River, BC that Minister Joyce Murray was about to enter with selected invitees (most of whom turned out to be pro-farm people). Minister Murray paused on her way in to chat with us for a few minutes. We all felt she heard out concerns, and she encouraged us to go online to complete the online survey, assuring us it was imperative that the ministry receive survey submissions from all sides. I now wonder if she herself had actually seen the survey, because it definitely was designed to preclude any meaningful feedback from people who want the government to live up to its promise to end open-net farms by 2025 -- which we all assumed meant getting them out of the ocean altogether. The survey is designed to assure that only feedback on optional ways of continuing to farm salmon in the ocean was received. There are MANY British Columbians, including myself (a former fish biologist) who know that there is currently no technology that is even close to guaranteeing that any so-called "semi-contained" ocean-based net system will 100% remove viral particles and polluting chemicals from continuing to be released into the ocean environment. Along with the juvenile planktonic sea lice, these are all severely affecting especially young salmon as they migrate towards the open ocean. The ways things are going, we may all live to see the complete disappearance of any meaningful populations of Pacific salmon. And as you no doubt know, the devastating cascading effects of their disappearance would drastically impoverish the complex marine ecosystem that has existed for at least tens of thousands of years. It causes me shudder at the far reaching changes this would initiate, including the loss of many iconic marine species that depend on the continuation of healthy and abundant wild salmon -- to say nothing of the devastation this would inflict on most of our coastal commutes, and the almost guaranteed extinction of First Nations' traditional cultures.

Below, I share with you my views on the identified objectives for the Transition Plan. These have been prepared by the Living Ocean Society, but they accurately describe my personal concerns and objections to the ways the government is currently going about circumventing its promises. I can summarize them briefly by saying I expect open-net pens to be removed by 2025 and I will not accept that measures supposed to reduce harm are adequate. There is no regulatory measure or marine-based technology in existence that can protect wild salmon from the disease, sea lice and pollution of salmon farms: if they’re ‘semi-closed’, they’re ‘still open’. Far too many wild salmon populations are threatened or endangered for harm reduction approaches: they need the elimination of harm at the earliest possible moment.

I ask you, as my representative, to ensure that the government follows through on its promise and removes open-net pen salmon farms by 2025.

Objective 1: Transition from open-net pen aquaculture.
I cannot stress enough that so-called “semi-closed”, “hybrid” and “offshore” salmon farms will not meet the government’s commitment, will not protect wild salmon and will not satisfy voters like me, who believe that the government has committed to protect wild salmon from salmon farms. All of these technologies continue to depend on open-net pens to grow salmon to market size.

There are no policy or management measures that can possibly regulate the sea lice, disease pathogens and pollution that flow freely from open-net pens; and there is no technology commercially available that can protect wild salmon from the impacts of farm effluent. That said, it would be a very good idea to appoint third-party observers to the farms, to ensure that Conditions of Licence continue to be observed during final production cycle’s growout and decommissioning of the farms.

Many salmon populations in B.C. are so severely depressed that they may become extinct if the harm caused by net pens is not eliminated — measures aimed at reducing harm will be too little, too late. The timeline for eliminating the farms was set by government already: 2025. I expect all salmon farms to be removed by that time.

I would like to see capacity preserved for shellfish and seaweed aquaculture, with a management regime that empowers First Nations to steward their territories effectively, within a regulatory regime that protects biodiversity and ecological integrity in aquaculture practices. DFO should concentrate on developing an appropriate regulatory regime and government support should focus on helping First Nations, communities and displaced salmon farm workers to take part in regenerative aquaculture, habitat restoration, monitoring and enforcement with a view to rebuilding the wild salmon economy of our coast.

Ultimately, I would like to see “a transformed aquaculture sector in B.C. which [completely] moves away from [marine-based] salmon and focuses on land-based, shellfish, or marine plant culture”.

Objective 2: Trust and transparency

The DFO requires a complete overhaul of the manner in which science advice is created and applied. Transparency alone will be insufficient to cure the distrust that decades of denial, suppression and mismanagement have created. The sole focus of DFO science should be the restoration of wild fish populations through the implementation of ecosystem-based management and it clearly is not so focused today.

Public accountability for the implementation of the transition plan will be extremely important, as will an enhanced role for coastal and First Nations communities in the regulation, monitoring and enforcement for any future regenerative (i.e., seaweed, shellfish) aquaculture activities.

Objective 3: Reconciliation and Indigenous partnerships

Reconciliation with First Nations should include restoring to all Nations access to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the interior of BC, who have suffered the loss of Fraser and Thompson River salmon, in particular. Given the migratory nature of salmon, no First Nation can claim that reconciliation demands that they be permitted to continue farming salmon in open-net pens - to the continued detriment of wild salmon, as well as the rights of the many First Nations along salmon migration routes who oppose salmon farming operations due to their impacts to the wild salmon they depend on.

Recognizing that a number of First Nations have profited from permitting salmon farms in their territories and that government has permitted and encouraged this to take place, government’s focus now should be on
finding out what those Nations want to do to replace the jobs and revenue that salmon farm companies provided. Support for alternative economic development should be included in the Transition Plan.

Objective 4: Growth in B.C. sustainable aquaculture innovation

For fully 10 years, Norway has been encouraging innovation in ocean-based salmon farming, yet the Norwegian-based companies that farm B.C. waters have failed to find a sustainable and commercially viable method of growing salmon to market size in an ocean-based tenure. None of the experimental technology even begins to address the transmission of farm-introduced or farm-amplified pathogens, which we now know to be having population-level impacts to wild Pacific salmon. So, no; I do not believe that technological innovation in ocean tenures is going to prevent harm to wild salmon.

The Transition Plan should focus on creating an appropriate regulatory framework for land-based recirculating aquaculture facilities and shellfish and seaweed farming. It should streamline applications processes and ensure that local capacity for monitoring and enforcement is enhanced, whether by First Nations or other coastal communities hosting such facilities.

As indicated above, I am adamantly opposed to so-called ‘semi-closed’, ‘hybrid’ and ‘offshore’ production systems, all of which are still dependent on open-net pens; and so I oppose the idea of a Transition Plan that would include any support for developing such systems. I would, however, approve of tax incentives for investment in land-based or regenerative aquaculture. Unfortunately, the public survey was so designed as to make this distinction impossible.

In summary: Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,

s.19(1)
From: 
Sent: Tuesday, October 25, 2022 1:42 PM
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
Subject: Hold government to account for salmon farm transition plan

Dear Fisheries and Oceans Canada,

First of all, this is not just a cut and paste letter. I feel very strongly that the only thing that will protect the remnants of our wild salmon populations is the complete removal of fish farms from the ocean. There is a ton of scientific evidence to show how extremely detrimental fish farms are to the health of wild salmon. The simplest and best proof is the fact that when fish farms are removed, wild fish are healthier and more abundant. Viz: Okanagan sockeye return 3xs higher than forecast. Barkley sockeye 2xs higher than forecast, Skeena 4xs higher than forecast. Fraser 5xs lower than forecast... the pattern is stark. Only Fraser sockeye were exposed to salmon farm disease and lice, over 95% of the 2022 Fraser sockeye were heavily infected with sea lice when they went to sea.

Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove ALL open-net pen salmon farms by 2025.

I write to express my extreme dissatisfaction with the public consultation currently underway for the Salmon Aquaculture Transition Plan. I find the DFO’s multiple-choice survey to be predicated on the assumption that ocean-based salmon farms are here to stay and so designed that I cannot express my opinion on the content of a transition plan that would meet my expectations of the government’s promise to "transition open-net pens from B.C. waters by 2025."

Below, I share with you my views on the identified objectives for the Transition Plan. I can summarize them briefly by saying I expect open-net pens to be removed by 2025 and I will not accept that measures supposed to reduce harm are adequate. There is no regulatory measure or marine-based technology in existence that can protect wild salmon from the disease, sea lice and pollution of salmon farms: if they’re "semi-closed," they’re still "open." Far too many wild salmon populations are threatened or endangered for harm reduction approaches: they need the elimination of harm at the earliest possible moment.

I ask you, as my representative, to ensure that the government follows through on its promise and removes open-net pen salmon farms by 2025.

Objective 1: Transition from open-net pen aquaculture.

I cannot stress enough that so-called “semi-closed”, “hybrid” and “offshore” salmon farms will not meet the government’s commitment, will not protect wild salmon and will not satisfy voters like me, who believe that the government has committed to protect wild salmon from salmon farms. All of these technologies continue to depend on open-net pens to grow salmon to market size.

There are no policy or management measures that can possibly regulate the sea lice, disease pathogens and pollution that flow freely from open-net pens; and there is no technology commercially available that can protect wild salmon from the impacts of farm effluent. That said, it would be a very good idea to appoint third-party observers to the farms, to ensure that Conditions of Licence continue to be observed during final
production cycle’s growout and decommissioning of the farms.

Many salmon populations in B.C. are so severely depressed that they may become extinct if the harm caused by net pens is not eliminated — measures aimed at reducing harm will be too little, too late. The timeline for eliminating the farms was set by government already: 2025. I expect all salmon farms to be removed by that time.

I would like to see capacity preserved for shellfish and seaweed aquaculture, with a management regime that empowers First Nations to steward their territories effectively, within a regulatory regime that protects biodiversity and ecological integrity in aquaculture practices. DFO should concentrate on developing an appropriate regulatory regime and government support should focus on helping First Nations, communities and displaced salmon farm workers to take part in regenerative aquaculture, habitat restoration, monitoring and enforcement with a view to rebuilding the wild salmon economy of our coast.

Ultimately, I would like to see “a transformed aquaculture sector in B.C. which [completely] moves away from [marine-based] salmon and focuses on land-based, shellfish, or marine plant culture”.

Objective 2: Trust and transparency

The DFO requires a complete overhaul of the manner in which science advice is created and applied. Transparency alone will be insufficient to cure the distrust that decades of denial, suppression and mismanagement have created. The sole focus of DFO science should be the restoration of wild fish populations through the implementation of ecosystem-based management and it clearly is not so focused today.

Public accountability for the implementation of the transition plan will be extremely important, as will an enhanced role for coastal and First Nations communities in the regulation, monitoring and enforcement for any future regenerative (i.e., seaweed, shellfish) aquaculture activities.

Objective 3: Reconciliation and Indigenous partnerships

Reconciliation with First Nations should include restoring to all Nations access to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the interior of BC, who have suffered the loss of Fraser and Thompson River salmon, in particular. Given the migratory nature of salmon, no First Nation can claim that reconciliation demands that they be permitted to continue farming salmon in open-net pens - to the continued detriment of wild salmon, as well as the rights of the many First Nations along salmon migration routes who oppose salmon farming operations due to their impacts to the wild salmon they depend on.

Recognizing that a number of First Nations have profited from permitting salmon farms in their territories and that government has permitted and encouraged this to take place, government’s focus now should be on finding out what those Nations want to do to replace the jobs and revenue that salmon farm companies provided. Support for alternative economic development should be included in the Transition Plan.

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For fully 10 years, Norway has been encouraging innovation in ocean-based salmon farming, yet the Norwegian-based companies that farm B.C. waters have failed to find a sustainable and commercially viable method of growing salmon to market size in an ocean-based tenure. None of the experimental technology even begins to address the transmission of farm-introduced or farm-amplified pathogens, which we now know to be having population-level impacts to wild Pacific salmon. So, no; I do not believe that technological innovation in ocean
tenures is going to prevent harm to wild salmon.

The Transition Plan should focus on creating an appropriate regulatory framework for land-based recirculating aquaculture facilities and shellfish and seaweed farming. It should streamline applications processes and ensure that local capacity for monitoring and enforcement is enhanced, whether by First Nations or other coastal communities hosting such facilities.

As indicated above, I am adamantly opposed to so-called ‘semi-closed’, ‘hybrid’ and ‘offshore’ production systems, all of which are still dependent on open-net pens; and so I oppose the idea of a Transition Plan that would include any support for developing such systems. I would, however, approve of tax incentives for investment in land-based or regenerative aquaculture. Unfortunately, the public survey was so designed as to make this distinction impossible.

In summary: Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,
From: 
Sent: Tuesday, October 25, 2022 1:42 PM 
To: PAC Aquaculture Engagement / Engagement de la quaculture PAC (DFO/MPO) 
Subject: Public consultation on the DFO Transition Plan Framework

Dear Fisheries and Oceans Canada,

Could it be any clearer in our BC waters with salmon stressed from every possible angle that one of the long term causes of decline of our salmon, the ocean-based fish farms, must be removed as the federal government promised by 2025. Period. I write to express my extreme dissatisfaction with the public consultation currently underway for the Salmon Aquaculture Transition Plan. I find the DFO’s multiple-choice survey to be predicated on the assumption that ocean-based salmon farms are here to stay and so designed that I cannot express my opinion on the content of a transition plan that would meet my expectations of the government’s promise to ‘transition open-net pens from B.C. waters by 2025’.

Below, I share with you my views on the identified objectives for the Transition Plan. I can summarize them briefly by saying I expect open-net pens to be removed by 2025 and I will not accept that measures supposed to reduce harm are adequate. There is no regulatory measure or marine-based technology in existence that can protect wild salmon from the disease, sea lice and pollution of salmon farms: if they’re ‘semi-closed’, they’re ‘still open’. Far too many wild salmon populations are threatened or endangered for harm reduction approaches: they need the elimination of harm at the earliest possible moment.

I ask you, as my representative, to ensure that the government follows through on its promise and removes open-net pen salmon farms by 2025.

Objective 1: Transition from open-net pen aquaculture.

I cannot stress enough that so-called “semi-closed”, “hybrid” and “offshore” salmon farms will not meet the government’s commitment, will not protect wild salmon and will not satisfy voters like me, who believe that the government has committed to protect wild salmon from salmon farms. All of these technologies continue to depend on open-net pens to grow salmon to market size.

There are no policy or management measures that can possibly regulate the sea lice, disease pathogens and pollution that flow freely from open-net pens; and there is no technology commercially available that can protect wild salmon from the impacts of farm effluent. That said, it would be a very good idea to appoint third-party observers to the farms, to ensure that Conditions of Licence continue to be observed during final production cycle’s growout and decommissioning of the farms.

Many salmon populations in B.C. are so severely depressed that they may become extinct if the harm caused by net pens is not eliminated — measures aimed at reducing harm will be too little, too late. The timeline for eliminating the farms was set by government already: 2025. I expect all salmon farms to be removed by that time.

I would like to see capacity preserved for shellfish and seaweed aquaculture, with a management regime that empowers First Nations to steward their territories effectively, within a regulatory regime that protects biodiversity and ecological integrity in aquaculture practices. DFO should concentrate on developing an appropriate regulatory regime and government support should focus on helping First Nations, communities and
displaced salmon farm workers to take part in regenerative aquaculture, habitat restoration, monitoring and enforcement with a view to rebuilding the wild salmon economy of our coast.

Ultimately, I would like to see “a transformed aquaculture sector in B.C. which [completely] moves away from [marine-based] salmon and focuses on land-based, shellfish, or marine plant culture”.

Objective 2: Trust and transparency

The DFO requires a complete overhaul of the manner in which science advice is created and applied. Transparency alone will be insufficient to cure the distrust that decades of denial, suppression and mismanagement have created. The sole focus of DFO science should be the restoration of wild fish populations through the implementation of ecosystem-based management and it clearly is not so focused today.

Public accountability for the implementation of the transition plan will be extremely important, as will an enhanced role for coastal and First Nations communities in the regulation, monitoring and enforcement for any future regenerative (i.e., seaweed, shellfish) aquaculture activities.

Objective 3: Reconciliation and Indigenous partnerships

Reconciliation with First Nations should include restoring to all Nations access to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the interior of BC, who have suffered the loss of Fraser and Thompson River salmon, in particular. Given the migratory nature of salmon, no First Nation can claim that reconciliation demands that they be permitted to continue farming salmon in open-net pens - to the continued detriment of wild salmon, as well as the rights of the many First Nations along salmon migration routes who oppose salmon farming operations due to their impacts to the wild salmon they depend on.

Recognizing that a number of First Nations have profited from permitting salmon farms in their territories and that government has permitted and encouraged this to take place, government’s focus now should be on finding out what those Nations want to do to replace the jobs and revenue that salmon farm companies provided. Support for alternative economic development should be included in the Transition Plan.

Objective 4: Growth in B.C. sustainable aquaculture innovation

For fully 10 years, Norway has been encouraging innovation in ocean-based salmon farming, yet the Norwegian-based companies that farm B.C. waters have failed to find a sustainable and commercially viable method of growing salmon to market size in an ocean-based tenure. None of the experimental technology even begins to address the transmission of farm-introduced or farm-amplified pathogens, which we now know to be having population-level impacts to wild Pacific salmon. So, no; I do not believe that technological innovation in ocean tenures is going to prevent harm to wild salmon.

The Transition Plan should focus on creating an appropriate regulatory framework for land-based recirculating aquaculture facilities and shellfish and seaweed farming. It should streamline applications processes and ensure that local capacity for monitoring and enforcement is enhanced, whether by First Nations or other coastal communities hosting such facilities.

As indicated above, I am adamantly opposed to so-called ‘semi-closed’, ‘hybrid’ and ‘offshore’ production systems, all of which are still dependent on open-net pens; and so I oppose the idea of a Transition Plan that would include any support for developing such systems. I would, however, approve of tax incentives for investment in land-based or regenerative aquaculture. Unfortunately, the public survey was so designed as to
make this distinction impossible.

In summary: Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,

s.19(1)
From:  
Sent: Tuesday, October 25, 2022 1:47 PM  
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)  
Subject: There is no future for marine-based salmon aquaculture in BC!

To the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard (DFO):

*This letter is intended to form part of your public consultation process “Discussion framework for a BC aquaculture open-net pen transition plan”.  
I HAVE COMMUNICATED WITH YOUR OFFICE REGARDING THIS MATTER. YOU ARE MY M.P. AS WELL AS BEING MINISTER OF DFO. I URGE YOU TO OBSERVE THE CONDITIONS OF OUR WILD SEALIFE WITHIN B.C. AND THE REST OF CANADA AND PUT NATURE, OUR ENVIRONMENT AND CITIZENS BEFORE CORPORATE PROFITS!

I write to urge you to keep your government’s promise to create “a responsible plan to transition from open-net pen salmon farming in coastal B.C. waters by 2025.” and to implement a transition plan that is centred on the conservation of wild pacific salmon and that includes:

A clear deadline for the removal of all open-net salmon farms in BC waters by 2025 or earlier;

A clear plan by which this removal will be achieved.

A statement that makes it clear that other in-water salmon aquaculture technologies, such as semi-closed or hybrid, will also not be permitted after the set deadline.

I FIND THE PUBLIC SURVEY your department is currently running on this issue MISLEADING AND VAGUE IN ITS INTENTIONS. The survey uses misleading terminology, fails to define what type of salmon aquaculture is being referred to and the written feedback section IS NOT ADEQUATE FOR OPINING ON six or more questions. IT IS A TYPICAL SURVEY THAT RESULTS IN A CITIZEN UNINTENTIONALLY SUPPORTING harmful in-water systems that will not address the major impacts current fish farms are having on wild pacific salmon populations.

The lack of transparency and potential hidden intentions behind this survey are extremely worrisome for me and the 75% percent of British Columbians that are in favour of removing any type of salmon aquaculture from BC waters (Insights West Poll 2021) and do not help to rebuild the trust lost on DFO’s processes around this issue.

- Wild Pacific salmon are in crisis and action is needed now. This transition plan needs to centre the recovery and conservation of pacific wild salmon stocks.

- The only proven technology known to fully eliminate interactions between farmed and wild fish is land-based aquaculture. Any other technologies will fail to accomplish this and continue to put wild salmon at risk.

- The government must engage authentically with coastal communities to mitigate the potential job losses, and create a community based plan to support individuals currently in the industry.

- The objectives and tactics around this transition plan need to be centred on the full implementation of UNDRIP.

s.19(1)
I fully trust that as the Minister of the department, you intend to do the right thing for the fragile populations of wild pacific salmon, as well as for the people that depend on them. I believe that the time to take leadership is now and the only person that can do that is you.

The only way forward is with open-net salmon aquaculture out of BC waters by 2025 at the latest.

s.19(1)
From: [Redacted]  
Sent: Tuesday, October 25, 2022 10:34 PM  
To: PAC Aquaculture Engagement / Engagement de la quaculture PAC (DFO/MPO); Minister / Ministre (DFO/MPO)  
Subject: Open Net Pen Transition  

Follow Up Flag: Follow up  
Flag Status: Completed

To Whom it may concern,

My name is [Redacted] a BC based seafood brand with operations in BC and PEI.

Scout is a rapidly growing domestically sourced and produced seafood brand with a climate action mission, currently sold across Canada and the US with additional export markets. Our mission is to connect consumers back to ocean health and climate action through responsible seafood.

We adamantly support the Liberal government’s prioritization of the open-net pen transition plan established last year and we hope the government will not roll back on its commitments to reduce farming licenses. While we understand this is a complex issue, particularly around employment, the environmental fall out from the continued farming on our costs will cost us more in the near term.

The licence holders are massive and profitable companies that generate tremendous revenues from our oceans yet do absolutely nothing to protect the ecosystems from which they profit. As you know, there are existing land based RAS technologies and proven infrastructure that are scalable and profitable without putting our natural ecosystems at risk. I’ve toured several myself both in Canada and the US. There are increased market demands for Kelp and biovalve production which can "move in" to some of the existing sites for regenerative ocean farming opportunities that can help protect our oceans while creating jobs and economic value. The open net pen farms could be provided subsidies or funding from the government to incentivize the transition of the infrastructure along our coast to regenerative ocean farming.

Canada has a bright future in responsible wild fisheries and responsible aquaculture. There is a new generation of climate forward fishers and entrepreneurs building out economic opportunities that are creating jobs, export opportunities and taxable revenues for the government. Scout being a prime example, Skipper Ottos, Organic Oceans, Cascadia seaweed, West Creek Salmon, Sustainable Blue, West coast fish culture, and countless others are the next generation of leaders that are driving Canada’s seafood industry and innovation forward responsibly - not the old guard of Mowi and Cermaq, even though they easily have the profits to work collaboratively on a transition to land while increasing their climate environmental protection programs.

We are in a new era of climate action and short term economics can no longer trump the longer term effects we know our climate emergency is bringing forward in greater strength year over year.

I welcome your questions or comments.

Be well,

[Redacted]  
s.19(1)
From: 
Sent: Tuesday, October 25, 2022 11:54 PM
To: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)
Subject: Transition must ensure all open-net pen salmon farms are out by

Dear Fisheries & Oceans Canada,

I am writing you this letter because your consultation survey on open-net salmon farming is hopelessly inadequate. The survey asks people's opinions about a series of half-measures that will not protect salmon. Ocean-based salmon farming must be completely stopped in order to give wild salmon and the ecosystems that depend on them a chance of survival. The federal government must follow through on their promise to “transition open-net pens from BC waters by 2025.” In fact, this date should be taken as a minimum standard. Faster action would be even better, given the critically low levels of many wild salmon populations.

When developing a transition plan please focus on reconciliation with First Nations including alternative economic development opportunities for coastal First Nations affected by the removal of open-net salmon farming, and compensation and support for Interior Nations who are suffering from the tiny salmon returns.

Please ensure that the federal government follows through on its promise to remove open-net pen salmon farms from BC waters by 2025, or sooner.

Sincerely,

s.19(1)
From: [Name]
Sent: Wednesday, October 26, 2022 1:29 PM
To: Minister / Ministre (DFO/MPO); PAC Aquaculture Engagement /
Engagement de la aquaculture PAC (DFO/MPO)
Cc: Don Svanvik
Subject: Letter from Chief Don Svanvik, 'Namgis First Nation, to the Minister of
Fisheries, Oceans and the Canadian Coast Guard
Attachments: LTR Chief Svanvik to Minister Joyce Murray re Oct 13 2022 Roundtable on
Aquaculture Transition Plan (Oct 25 2022) - (00628717xCE09F).PDF

Good morning,

On behalf of 'Namgis First Nation, please see the attached letter from Chief Don Svanvik of 'Namgis First Nation
dated October 25, 2022, to Minister Joyce Murray, the Minister of Fisheries, Oceans and the Canadian Coast Guard.

Kind regards,

MacKenzie Fujisawa LLP
1600–1095 W Pender Street, Vancouver, BC V6E 2M6
D ☏ P 604 689 3281 | F 604 685 6494
macfuj.com

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VIA EMAIL: min@dfo-mpo.gc.ca

Minister of Fisheries, Oceans and the Canadian Coast Guard
Fisheries and Oceans Canada
200 Kent Street
Ottawa, ON K1A 0E6

Attention: Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard

Dear Minister Murray,

Re: Follow-up to October 13, 2022 Meeting Regarding Fisheries and Oceans Canada’s ("DFO") Aquaculture Transition Plan (the "Transition Plan")

Thank you for the round-table meeting I attended on October 13, 2022 regarding DFO’s Transition Plan for open net-pen fish farms.

I was extremely disappointed and concerned to learn about DFO’s plan to work towards "progressive minimalization" of harm associated with open net-pen fish farms. As I made clear at the October 13, 2022 meeting, progressive minimalization of harm through enhanced regulation, semi-closed containment and all other measures short of removing open net-pen fish farms, will not address the serious and irreparable harm that the open net-pen fish farms cause wild Pacific salmon and other marine resources.

‘Namgis First Nation ("Namgis") has relied on Pacific salmon and other marine species since time immemorial to exercise our inherent and constitutionally protected right to fish for food, social and ceremonial ("FSC") purposes. Failure to address the harm that open net-pen fish farms cause to wild Pacific salmon and other marine species will mean a failure to protect our Aboriginal rights and title from infringement and extinguishment.

Enhanced regulation, semi-closed containment and reliance on industry is not acceptable

DFO’s proposal to rely on semi-closed containment, enhanced regulation and industry-led innovation to progressively minimize the harm caused by open net-pen fish farms is unacceptable to ‘Namgis and contrary to the Prime Minister’s mandate:

- An industry-led transition is inconsistent with the Prime Minister’s mandate and DFO’s core mandate to protect and conserve fish:
  - The Prime Minister’s mandate states that the Minister is to “work with the province of British Columbia and Indigenous communities [...] to transition from open net-pen salmon farming in coastal British Columbia waters by 2025" (bolding and italics added).
  - The Prime Minister directed you to co-develop the transition plan with Indigenous communities and the province. Co-developing a plan with industry is contrary to that
mandate and contrary to case law from the Supreme Court of Canada confirming that you must prioritise conservation of fish and the protection of our Aboriginal rights over the interests of commercial fisheries.¹

- Semi-closed containment provides no protection against pathogen transfer to wild Pacific salmon:
  - Semi-closed containment systems allow pathogens, such as Piscine orthoreovirus ("PRV") and Tenacibaculum, to be transferred to migrating Pacific salmon through fish farms’ effluent.
  - Farmed stock will spend 12 months in open net-pens along migratory routes, where they will continuously spread pathogens to endangered populations of Pacific salmon.
  - Increased biomass at each tenure will result in increased ecological risks associated with each farm.

- Enhanced regulation of open net-pen fish farms will not minimize and eliminate the harm associated with open net-pen aquaculture:
  - DFO cannot effectively regulate the risk of serious and potentially irreversible harm once millions of farmed salmon infected with pathogens and parasites are transferred into fish farms along the migratory routes of Pacific salmon.
  - DFO has repeatedly failed to use the regulatory tools already available to it and has not demonstrated that it is capable of effectively regulating the industry:
    - Documents obtained under an Access to Information Request ("ATIP") contained correspondence from DFO managers admitting that they cannot effectively monitor sea lice conditions on fish farms or enforce sea lice conditions of licence.²

DFO has not objectively regulated the aquaculture industry according to its legal duties

Open net-pen aquaculture is a serious threat to the survival of endangered and threatened Pacific salmon stocks. In 2020 and 2021, DFO’s own risk assessments recommended that all sources of harm should be reduced to the maximum extent possible to protect nine designatable units of Fraser River sockeye classified as endangered or threatened,³ and expressly identified open net-pen aquaculture as a threat to the survival of threatened and endangered populations of Fraser River Chinook.⁴ Additionally, a substantial and growing body of scientific literature confirms that pathogens and parasites from open net-pen fish farms are associated with serious and irreparable population-level harm to Pacific salmon.

Where fish farms have been removed, we have witnessed increased Pacific salmon returns. In the Broughton Archipelago, pink salmon returns increased this year along the migratory routes where fish farms were removed two years ago. Two years ago, pinks returning this year swam out along those farm-free migratory routes. It was the first time in years they had been able to migrate out to sea without swimming through a gauntlet of sea lice, pathogen plumes and effluent from open net-pen fish farms.

² ATIP A-2020-00492, pp. 000052, 000081, 000084 and 0000176.
'Namgis has little faith that DFO can regulate the industry effectively:

- DFO opted against adopting precautionary conditions of licence for sea lice that would have resulted in “better risk management and increased enforceability” because an “unhappy industry” was concerned about capping production and increased non-compliance.\(^5\)
- DFO has repeatedly suppressed science that undermines its policies and industry interests:
  - For a decade, DFO suppressed Dr. Kristi Miller-Saunders’ research showing that PRV is associated with a lethal disease in farmed Chinook.\(^6\)
  - Since April 2016, DFO has ignored Dr. Espen Rimstad’s, a Norwegian expert on PRV, research confirming that PRV from BC induces disease:
    - Since then, DFO has repeatedly declared that it does not have evidence that PRV from BC causes disease, including during a constitutionally mandated consultation process with ‘Namgis over DFO’s PRV policy in 2019.
  - DFO withheld research showing Tenacibaculum is associated with population-level impacts in Pacific salmon from the Minister of Fisheries, Oceans and the Canadian Coast Guard (the "Minister") and First Nations, while contemporaneously briefing industry on it.\(^7\)
- DFO continues to regulate the industry as though these well-documented risks do not exist, contrary to DFO’s duty to abide by the precautionary principle:
  - Despite the Federal Court twice finding DFO’s regulation of PRV unlawful and contrary to the precautionary principles,\(^8\) DFO continues to rely on the same PRV policy which allows millions of PRV-infected smolts to be transferred into open net-pen fish farms along the migratory routes of endangered Pacific salmon.
  - The Federal Court confirmed that the precautionary principle requires DFO to exercise precaution and intervene, even “where a risk is suspected, conjectured or feared” and to not use scientific uncertainty to delay action.\(^9\)

There is a risk of extinction of wild Pacific salmon and extinguishment of ‘Namgis’ rights

‘Namgis is concerned that DFO’s proposed “progressive minimalization” is another tactic to avoid recognizing the serious and irreparable harm associated with open net-pen aquaculture, evade DFO’s legal obligations and to justify the continued operation of open net-pen fish farms that risk the extinction of wild Pacific salmon and the extinguishment of ‘Namgis’ inherent and Aboriginal right to fish for FSC purposes.

The extinction of wild salmon is part of the ongoing genocide against ‘Namgis and our people and we will not stand idle while government action (or inaction) threatens to extinguish our culture and rights that are integral to ‘Namgis as Indigenous peoples.

We are hopeful that as the Minister, you will honour the Prime Minister’s mandate to transition open-net pens out of British Columbia and the Crown’s constitutional obligations to First Nations during the transition process.

\(^5\) ATIP A-2020-00026, p. 001412.
\(^7\) ATIP A-2020-01561, pp. 000053-000054.
\(^8\) Morton v Canada (Fisheries and Oceans), 2015 FC 575; and Morton v Canada (Fisheries and Oceans), 2019 FC 143 ("Morton 2019").
‘Namgis looks forward to engaging with you on these issues further as you work to implement the Prime Minister’s mandate.

Sincerely,

Chief Don Svanvik

‘Namgis First Nation

s.19(1)
To the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard (DFO):

Please keep your government’s promise to create “a responsible plan to transition from open-net pen salmon farming in coastal B.C. waters by 2025.” and to implement a transition plan centred on conservation of wild pacific salmon including:

- An end to all open-net fish farming!
- A clear deadline for the removal of all open-net salmon farms in BC waters by 2025 or earlier (preferably earlier!);
- A clear plan by which this removal will be achieved.
- A statement making it clear that other in-water salmon aquaculture technologies, such as semi-closed or hybrid, will also not be permitted.

75% percent of British Columbians are in favour of removing any type of salmon aquaculture from BC waters (Insights West Poll 2021).

- Wild Pacific salmon are in crisis and action is needed now. This transition plan needs to centre on the recovery and conservation of pacific wild salmon stocks.

- The only proven technology known to fully eliminate interactions between farmed and wild fish is land-based aquaculture. All other technologies fail to accomplish this and continue to threaten wild salmon.

- The government must engage authentically with coastal communities to mitigate potential job losses, and create a community-based plan to support individuals currently in the industry.

- The objectives and tactics around this transition plan need to be centred on the full implementation of UNDRIP.

I trust that as the Minister of the department, you intend to do the right thing for our fragile populations of wild pacific salmon, as well as for the people that depend on them. I believe that the time to take leadership is now and the only person to do that is you.

The only way forward is with open-net salmon aquaculture out of BC waters by 2025 at the latest.

s.19(1)
Really dumb to use HTM as it is not working as I have submitted twice and received no response. Attached is my PDF version
Comment on the discussion framework for a BC aquaculture open-net pen transition plan

On September 6, this survey was taken down from this website and republished on September 28. As a consequence, the survey input window has been extended to October 27 to ensure the total available opportunity for input is not reduced.

We updated our survey questions on September 28th, 2022 to provide greater clarity. Submissions received prior to September 6 will continue to be taken into consideration and will be given equal weight to those received after the republication. If you filled out the survey prior to September 6, but feel that these updates could change your responses, you may fill out the survey again.

You are invited to provide input on the 4 objectives proposed for an open-net pen transition plan as proposed in *The future of salmon aquaculture in British Columbia - Toward an open-net pen transition plan: A framework for discussion*.

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<td>Reduce the time that farmed salmon spend in the ocean.</td>
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<td>Use third-party observers or guardians to monitor aquaculture activity and performance.</td>
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Do not include any personal information in the comment box. Please enter "none" if you have no suggestions at this time.

Atlantic salmon are not native to BC. If they were they would already be here.

62 characters left

How important do you think each of the following approaches could be to coastal communities in the transition from open-net pen salmon aquaculture?

<table>
<thead>
<tr>
<th>Focus on a transition which supports and maintains the capacity for an</th>
<th>1-Not at all important</th>
<th>2-Slightly important</th>
<th>3-Neutral</th>
<th>4-Important</th>
<th>5-Very important</th>
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Support for advancing investment in alternative production technologies for salmon aquaculture (for example: semi-closed, land-based, floating, hybrid, offshore).

Support for advancing investment in growing other marine species of aquaculture (for example: shellfish, kelp, or other types of finfish).

Support workforce training and upskilling, for example, for alternative aquaculture technologies or species.

Support economic development related to a transition away from the aquaculture sector, into other sectors not related to aquaculture (for example: tourism) for communities or workers currently involved in aquaculture.

Do you have other suggestions? Click one of the circles to the right to open the comment box.

Do not include any personal information in the comment box. Please enter "none" if you have no suggestions at this time.

all open-Net pens should be removed from BC waters. period

In the development of the Open-Net Pen Transition Plan there are a range of outcomes. We want to understand what you would consider a successful Open-Net Pen Transition Plan.

Which of the following statements would best describe what a successful Open-Net Pen Transition Plan for B.C. looks like to you? Choose one option.

- A transition away from any marine salmon aquaculture to a sustainable land-based sector, accompanied by marine plants.

- A sustainable and economically viable salmon aquaculture industry in coastal B.C. which drives innovation and supports the use of new technology which could include marine components, provided that they reduce or eliminate interactions with wild salmon.

- A reduced aquaculture sector that transitions coastal economies to other sectors, such as tourism.

Objective 2: Trust and transparency

We have heard that trust and transparency represents a key area of concern in our current management of salmon aquaculture. We want to understand what you think could help build this trust among Canadians.

In your view, how important do you feel the following approaches should be to improve trust and transparency in salmon aquaculture management?

<table>
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<th>Enhanced transparency of the scientific review processes within Fisheries and Oceans Canada to confirm that robust information and assessment informs management</th>
<th>1-Not at all important</th>
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<th>3-Neutral</th>
<th>4-Important</th>
<th>5-Very important</th>
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Objective 3: Reconciliation and Indigenous partnerships

The Government of Canada is committed to advancing reconciliation with Indigenous Peoples. We will engage directly with coastal First Nations and non-coastal First Nations with strong connections to salmon throughout the development of an Open-Net Pen Transition Plan. We want to know what First Nations and British Columbians think are priorities for advancing reconciliation in an Open-Net Pen Transition Plan.

How high or low of a priority should each of the following proposals for an Open-Net Pen Transition Plan be to support reconciliation with First Nations in B.C.?

<table>
<thead>
<tr>
<th>Proposal</th>
<th>1-Very low priority</th>
<th>2-Low priority</th>
<th>3-Neutral</th>
<th>4-High priority</th>
<th>5-Very high priority</th>
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<td>A requirement for salmon aquaculture companies to secure coastal First Nations partnership from those within whose territories the licensed facility is located.</td>
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<td>Create aquaculture management areas that reflect the input and interest of Indigenous Peoples.</td>
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<td>Enhance opportunities for First Nations partnerships for monitoring, stewardship/guardianship programs and research and development.</td>
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<td>Support enhanced Indigenous knowledge and science contributions to aquaculture management.</td>
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Do not include any personal information in the comment box. Please enter "none" if you have no suggestions at this time.

I have never trusted a) the DFO and b) the owners of salmon farms as I am sure money has changed hands

38 characters left
Objective 4: Growth in B.C. sustainable aquaculture innovation

In the coming decades, growth of the global salmon aquaculture industry is expected to come from production using hybrid systems (a combination of land and marine-based net pen production), closed containment (marine and land-based), and offshore systems. Independent studies have assessed the feasibility of alternative technologies and suggest that land-based recirculating aquaculture systems (RAS) and hybrid systems are the most advanced and most ready for adoption in B.C.

We would like to understand your perspectives on the potential use of alternative production systems and technologies in B.C. Which alternative production system do you think should be a priority in advancing innovation in the Open-net Pen Transition in B.C.?

<table>
<thead>
<tr>
<th>Land-based systems, such as Recirculating Aquaculture Systems (RAS).</th>
<th>1-Very low priority</th>
<th>2-Low priority</th>
<th>3-Neutral</th>
<th>4-High priority</th>
<th>5-Very high priority</th>
<th>Unsure</th>
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<tr>
<td>Hybrid systems, where the initial hatchery/land-based stage of development is longer and the in-ocean grow-out stage is shortened.</td>
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<td>Closed or semi-closed containment systems instead of open-net pens.</td>
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<td>Ocean-based offshore systems (open-net pens located farther out to sea).</td>
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<td>Enhancements to current open-net pens through technologies which minimize interactions between net pens and wild salmon.</td>
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<td>Supporting technologies that have the potential to improve efficiencies and reduce possible impacts of marine-based salmon aquaculture.</td>
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Do you have other suggestions? Click one of the circles to the right to open the comment box.

Do not include any personal information in the comment box. Please enter "none" if you have no suggestions at this time.

I feel the the DFO is a corrupt government organization as evidenced by their altering of documents.

We have heard feedback from Canadians that investment in alternative aquaculture production technologies, including land-based facilities, needs to be encouraged.

Which of these potential incentives do you think should be a priority to attract investment to support innovation in the aquaculture industry in B.C.?
Develop an aquaculture research hub (such as a Centre of Expertise or Living Lab), where industry, scientists, government, and others could collaborate on the trial of new technologies and solutions.

Promote collaboration amongst industry through an aquaculture “supercluster” (an area of concentrated business and research activity).

Reduce administrative burdens and facilitate services and programs for potential land-based system investors and licence applicants.

Facilitate a licensing regime that encourages development and adoption of alternative production technologies.

Reduce regulatory barriers for applicants investing in new sustainable technologies, which could include land-based aquaculture.

Enable training and employment supports related to adoption of new technologies.

Do you have other suggestions? Click one of the circles to the right to open the comment box.

Do not include any personal information in the comment box. Please enter “none” if you have no suggestions at this time.

doing this in HTML is dumb as I had to do this twice. I shall be sending as a pdf

Tell us about you

We are interested to understand who we are hearing from in this survey. This will help us identify who has been represented and who we may need to engage with further. Please tell us a bit more about yourself.

Where do you live? Select all that apply.

I live in B.C.
I live in Canada, but not in B.C.
I am a resident of a coastal B.C. community
I am a resident of a B.C. community that depends on aquaculture
I prefer not to say
None of the above

What do you do? Select all that apply.

I work in a finfish aquaculture production company
I work in a company with a direct business relationship with finfish aquaculture production companies, for example, as a supplier, processor, and contractor
I am a representative of a First Nation or an Indigenous organization
I am a commercial fisher
I am a recreational fisher
I am an academic/researcher/scientist
I work for a conservation-focused organization
I prefer not to say
None of the above

Do you identify as an Indigenous person, that is, First Nations, Métis or Inuk (Inuit)?

Yes
No
Prefer not to answer

Submit

Privacy notice

Related links

- Global innovation clusters
- State of Salmon Aquaculture Technologies, 2019
- Open-net pen transition plan: initial engagement process "As was heard" report
- A summary of the Indigenous and Multi-stakeholder Advisory Body (IMAB) on aquaculture engagement process

Contact us

By email: DFO.PACAquacultureEngagement-Engagement delaquaculturePAC.MPO@dfo-mpo.gc.ca

Date modified: 2022-09-28
October 25, 2022

Hon. Joyce Murray
Minister of Fisheries, Oceans and the Canadian Coast Guard
Parliament Buildings
Ottawa, Ontario

Dear Minister:

We are writing to urge you in the strongest of terms to keep your government’s commitment and ban ALL ocean net salmon farms from B.C. coastal waters as planned. Semi-closed containment is another ploy that will only continue the assault on B.C. salmon, which are the backbone of the B.C. environment.

Norwegian multi-national corporations are not owed the right to destroy B.C. coastal salmon runs for their profit. Our Pacific coast ecosystems are on the verge of collapse, with herring virtually gone, many salmon runs on the verge of extinction and our southern resident killer whales literally starving to death due to a paucity of chinook salmon.

Alaskan overfishing is dealing another killer blow to B.C. coastal salmon stocks and keeping chinook from endangered SRKW, but B.C. is the only jurisdiction on the North American west coast still allowing fish farms that have been proven to infect salmon with lethal populations of sea lice, parasites and viruses, pathogens and pollution that have severely contributed to the low numbers of healthy salmon in our ecosystem, particularly PRV which causes organ failure in chinook. Overwhelming numbers of peer-reviewed scientific papers show that ocean fish farms – in any form – harm wild salmon, particularly juveniles.

As our salmon face more intensified threats from climate change – drought and extreme heat that is causing mass die-offs before spawning, logging and habitat loss - it is critical that the risk from fish farms be eliminated, and swiftly.

DFO has a long history of deception on fish farm management, with suppressed scientists and withheld scientific research. Its dysfunctional mandate of protection of both native and farmed salmon puts its staff into an impossible position, which the Cohen Commission recommended be rectified a decade ago, urging the creation of a Regional Director-General for Wild Salmon.

B.C. Salmon Farmers may argue that their industry generated $1.6 billion and employed 6,000 people in 2019 (https://www.nationalobserver.com/2022/06/22/news/fate-open-pen-fish-farms-are-line-along-canada-us-west-coast), but figures for the value of healthy salmon runs and the ecosystems and economies they support – all threatened by fish farms - dwarf this figure. The examples below are from as far back as decades ago, and tourism spending – dependent on healthy ecosystems, most of which are based on salmon in one form or another - has increased significantly since then:

s.19(1)
• B.C. wild caught salmon was worth $235 million to the 2018 economy, even with low returns (cbbc.ca/news/Canada/British-columbia/b-c-record-low-salmon-returning) - imagine its value when they return to health!

• "The value of sport fishing in BC is estimated at nearly $957 million, with 20% of that activity occurring in the Lower Mainland. Fraser salmon have an incredible cultural value to First Nations and local communities that cannot be captured in economic terms. Salmon that escape the fishery also provide critical ecological services, such as nutrients for freshwater ecosystems and food for more than 130 species of wildlife.” (https://www.raincoast.org/reports/salmon-vision/) (2020)

• “Tourism employs about 46,400 people. Over 19,690 tourism businesses operate in British Columbia. In 2020, the tourism industry generated $7.1 billion in revenue. The tourism industry contributed nearly $731 million in provincial taxes in 2020." (https://www2.gov.bc.ca/gov/content/tourism-immigration/tourism-resources/tourism-research)

• In a 2009 publication, Tourism BC Wildlife Viewing Product Overview, Tourism BC reported, “Of the estimated 5.6 million Canadian travellers who travelled within British Columbia in the past two years, over 1.5 million (27%) participated in a wildlife viewing activity while travelling. Approximately 310,000 (6%) stated that wildlife viewing was the primary reason for at least one overnight trip …. wildlife viewers spent $6.2 billion on wildlife viewing activities in BC in 1996; 63% of that spending was on direct wildlife viewing, defined as trips away from home where the main purpose is to watch, feed, photograph or study wildlife. Annual spending for direct wildlife viewing in BC was $454 per participant.”

• “In 2004, nearly one million tourists were already spending more than $900 million through roughly 2,200 businesses that offered nature-based activities in British Columbia (Tourism BC 2004). In the Salish Sea region, 27% of these businesses operate in Victoria, the Gulf Islands, and Vancouver Island, generating more than 20,000 person years of employment annually (Tourism BC 2005)." (The Tourist Dollar, Raincoast Conservation Foundation).

Minister Murray, you have shown foresight in closing the North and Central herring fishery, and your predecessors showed that same foresight in strengthening regulations to protect southern resident killer whales and the critical decision to close fish farms on B.C.‘s Coast.

But any decision other than following through on this commitment to remove all fish farms on the west coast would undermine your government’s pledge to halt and reverse natural loss by 2030, and it would undermine and negate all the effort and money your government has put into saving the SRKW and B.C. salmon to date. We must end this disastrous chapter in ecological experimentation and remove these time-bomb fish farms forever from our coastal waters, if we are to heal our ecosystems.

You have the power and the opportunity, the mandate to act and the commitment to honour, and if you hold fast, this will be a splendid legacy for your time as Minister. The southern resident killer whales and all the billions of creatures that depend on B.C. salmon are counting on you. Please don’t fail them.

Thank you for your kind attention to our concerns.

Best wishes,
Hello,

Please see Tla’amin Nation’s comments on the Framework for a BC Aquaculture Open-net Pen Transition Plan, attached.

Kind regards,

Lands and Resources Department

Tla’amin Nation

s.19(1)
Oct 27, 2022

ATTN: DFO.PCAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca

RE: Discussion framework for a BC aquaculture open-net pen transition plan

Thank you for the opportunity to provide comment on the Discussion Framework for a BC aquaculture open-net pen transition plan. tla’amin (Tla’amin) Nation (TN) have provided comments below.

General comments
If you have any further questions regarding the comments above, please do not hesitate to contact me.

Kind regards,

[Redacted]

, ḥaʔamun (Tla’amin) Nation Lands and Resources Dept.

cc:
Erik Blaney

[Redacted]

Linda Higgins
Ryan O’Connell
Teagan Wardrop
From: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO)

Sent: Thursday, October 27, 2022 1:05 PM

To: The time to transition from open-net salmon aquaculture is now!

Make it clear that other in-water salmon aquaculture technologies, such as semi-closed or hybrid, will also not be permitted after the set deadline.

I have not answered the public survey your department is running on this issue because I believe it is slimy, misleading and obviously intended to elicit a specific answer. It uses misleading language, fails to define what type of salmon aquaculture is being referred to.

And the so-called "written feedback" section is a joke. 140 characters to answer six or more questions! It is designed to elicit support harmful in-water systems that do not address the biggest impacts that in-water fish farms have on wild salmon populations.

The crude, obvious obvious intentions behind this survey are frankly insult my intelligence and that of the 75% percent of British Columbians that want to remove any type of salmon aquaculture from BC waters (Insights West Poll 2021). Not only that, it makes me have contempt for the level of intelligence displayed by the Department and its leadership. I do trust you at all.

- Wild Pacific salmon are in crisis and action is needed now. This transition plan needs to centre the recovery and conservation of pacific wild salmon stocks.

- The only proven technology known to fully eliminate interactions between farmed and wild fish is land-based aquaculture. Any other technologies will fail to accomplish this and continue to put wild salmon at risk.

- The government must engage authentically with coastal communities to mitigate the potential job losses, and create a community based plan to support individuals currently in the industry. This transition plan need to be centred on the full implementation of UNDRIP.

I hop, that as the Minister of the department, you intend to do the right thing. The populations of wild pacific salmon are fragile, as well as are the livelihood people that depend on them.

I believe that the time for you to take your leadership seriously The only way forward is with open-net salmon aquaculture out of BC waters by 2025 at the latest.

s.19(1)
Your survey was quite pointed towards a modified open pen fishfarm industry that hopefully can develop some less polluting methods.

Malarkey I say, the fishfarms have made a tonne of money and still can’t direct any profits for research. They have had enough time polluting BC waters and infecting BC wild salmon that are trying to get home to our volunteer river enhancement efforts.

And further more, even closed ashore, your fishfarms still need to harvest herring to grind up for feed, what kind of pure Malarkey is that? Leave the herring in the sea to feed MY wild salmon, MY wild halibut and MY wild cod.

Leave my herring alone and stop polluting BC waters and BC Salmon. Go home and grow your fishfarms there.

I filled in each comment section and not a word in favour of fishfarms.
From:                                        
Sent:  Thursday, October 27, 2022 7:26 PM  
To:   PAC Aquaculture Engagement / Engagement de la quaculture PAC  
       (DFO/MPO)  
Subject:  There is no future for marine-based salmon aquaculture in BC! 

To Joyce Murray, (DFO):  

Please confirm that you will proceed immediately to keep your leader's promise to create “a responsible plan to transition from open-net pen salmon farming in coastal B.C. waters by 2025.”  

No waffling on this. Industry and science (not DFO science) have had ample time to clean up their act, and neither have done so. Now we know that open-net pen salmon farming has a harmful effect on Wild Salmon.  

I am on my knees, pleading with you to preserve our coastal inheritance and take a clear, bold step to curtail such operations.  

Thanks in advance for following the wishes of the 75% of BC residents who believe this to be the case. 

s.19(1)
Greetings,

Dear Neil Ladell,

*This letter is intended to form part of your public consultation process "Discussion framework for a BC aquaculture open-net pen transition plan"

I’m writing today regarding the development of a plan to ‘transition from open net-pen salmon farming in coastal BC waters by 2025’.

Because your online survey has a pre-determined outcome (fish farms will remain in BC waters indefinitely), I’ve chosen to send this email instead.

I am one of the 75% of British Columbians who want fish farms removed from ocean waters. I support over 100 First Nations who are calling for this as well.

Your report states that “wild Pacific salmon are at risk of disappearing forever if we don’t act”. It is clear to me that open-net pens are harming wild salmon by spreading deadly pathogens, parasites and pollution.

Land-based systems are being built around the world right now, while floating in-water systems will require up to 5 years of further review.

There are no in-water fish farm technologies which protect wild salmon. Compromises and half-measures at this late stage are simply unacceptable. Wild salmon don’t have time to wait.

Please get to work developing the plan to remove salmon farms from BC waters by 2025.

Sincerely,

Regards,

s.19(1)
Dear Brenda McCorquodale, Director, Aquaculture Management Division,

cc: The Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard

I am deeply concerned about the direction of the framework for the aquaculture transition plan for British Columbia.

Wild salmon are crucial to First Nations, communities and ecosystems throughout B.C. They have provided livelihoods and economic opportunities for generations of British Columbians. With many salmon runs in decline and threatened by climate change, it is paramount to protect them from any risks that are directly within our control. They need bold action now, not gradual improvements. This means removing open-net pen fish farms from B.C. waters to eliminate the risk of disease and parasite transmission.

This is what I understood the objective of the government’s commitment to transition away from open-net pen salmon farms by 2025 to be. However, the proposed transition framework falls short of that commitment as it includes many options that will do little to address the harmful impacts of open-net pen aquaculture on wild salmon and does not reflect the urgency of the situation:

- Suggested changes to the licensing and management regime to improve environmental performance, such as the move to area-based management, come years too late and are insufficient given the current state of wild salmon populations.

- Moving farms offshore will shift the impacts to a different part of the marine environment.

- Semi-closed containment systems are not only unproven on a commercial scale but will also do little to stop the spread of viruses and bacteria from farmed to wild fish.

Land-based recirculating aquaculture systems are the only finfish aquaculture method proven to eliminate the risk to wild fish. The transition plan should focus on harnessing existing expertise and capacity within B.C. to support that burgeoning sector.

However, it is clear that not all farmed salmon production can be moved to land-based systems. Where this is not possible, the transition plan must focus on supporting workers and coastal communities to make the shift to other economic opportunities. These can include marine-based bivalve and seaweed aquaculture, wild salmon conservation and tourism.

We are at a critical point for wild salmon. There’s no time to backtrack on your government’s important commitments to protecting wild salmon. The only option is to remove open-net pen farms from B.C. waters by 2025.

Sincerely,
Dear Fisheries and Oceans Canada,

I write to express my extreme dissatisfaction with the public consultation currently underway for the Salmon Aquaculture Transition Plan. I find the DFO’s multiple-choice survey to be predicated on the assumption that ocean-based salmon farms are here to stay and so designed that I cannot express my opinion on the content of a transition plan that would meet my expectations of the government’s promise to ‘transition open-net pens from B.C. waters by 2025’.

Below, I share with you my views on the identified objectives for the Transition Plan. I can summarize them briefly by saying I expect open-net pens to be removed by 2025 and I will not accept that measures supposed to reduce harm are adequate. There is no regulatory measure or marine-based technology in existence that can protect wild salmon from the disease, sea lice and pollution of salmon farms: if they’re ‘semi-closed’, they’re ‘still open’. Far too many wild salmon populations are threatened or endangered for harm reduction approaches: they need the elimination of harm at the earliest possible moment.

I ask you, as my representative, to ensure that the government follows through on its promise and removes open-net pen salmon farms by 2025.

Objective 1: Transition from open-net pen aquaculture.

I cannot stress enough that so-called “semi-closed”, “hybrid” and “offshore” salmon farms will not meet the government’s commitment, will not protect wild salmon and will not satisfy voters like me, who believe that the government has committed to protect wild salmon from salmon farms. All of these technologies continue to depend on open-net pens to grow salmon to market size.

There are no policy or management measures that can possibly regulate the sea lice, disease pathogens and pollution that flow freely from open-net pens; and there is no technology commercially available that can protect wild salmon from the impacts of farm effluent. That said, it would be a very good idea to appoint third-party observers to the farms, to ensure that Conditions of Licence continue to be observed during final production cycle’s growout and decommissioning of the farms.

Many salmon populations in B.C. are so severely depressed that they may become extinct if the harm caused by net pens is not eliminated — measures aimed at reducing harm will be too little, too late. The timeline for eliminating the farms was set by government already: 2025. I expect all salmon farms to be removed by that time.

I would like to see capacity preserved for shellfish and seaweed aquaculture, with a management regime that empowers First Nations to steward their territories effectively, within a regulatory regime that protects biodiversity and ecological integrity in aquaculture practices. DFO should concentrate on developing an appropriate regulatory regime and government support should focus on helping First Nations, communities and displaced salmon farm workers to take part in regenerative aquaculture, habitat restoration, monitoring and enforcement with a view to rebuilding the wild salmon economy of our coast.
Ultimately, I would like to see “a transformed aquaculture sector in B.C. which [completely] moves away from [marine-based] salmon and focuses on land-based, shellfish, or marine plant culture”.

Objective 2: Trust and transparency

The DFO requires a complete overhaul of the manner in which science advice is created and applied. Transparency alone will be insufficient to cure the distrust that decades of denial, suppression and mismanagement have created. The sole focus of DFO science should be the restoration of wild fish populations through the implementation of ecosystem-based management and it clearly is not so focused today.

Public accountability for the implementation of the transition plan will be extremely important, as will an enhanced role for coastal and First Nations communities in the regulation, monitoring and enforcement for any future regenerative (i.e., seaweed, shellfish) aquaculture activities.

Objective 3: Reconciliation and Indigenous partnerships

Reconciliation with First Nations should include restoring to all Nations access to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the interior of BC, who have suffered the loss of Fraser and Thompson River salmon, in particular. Given the migratory nature of salmon, no First Nation can claim that reconciliation demands that they be permitted to continue farming salmon in open-net pens - to the continued detriment of wild salmon, as well as the rights of the many First Nations along salmon migration routes who oppose salmon farming operations due to their impacts to the wild salmon they depend on.

Recognizing that a number of First Nations have profited from permitting salmon farms in their territories and that government has permitted and encouraged this to take place, government’s focus now should be on finding out what those Nations want to do to replace the jobs and revenue that salmon farm companies provided. Support for alternative economic development should be included in the Transition Plan.

Objective 4: Growth in B.C. sustainable aquaculture innovation

For fully 10 years, Norway has been encouraging innovation in ocean-based salmon farming, yet the Norwegian-based companies that farm B.C. waters have failed to find a sustainable and commercially viable method of growing salmon to market size in an ocean-based tenure. None of the experimental technology even begins to address the transmission of farm-introduced or farm-amplified pathogens, which we now know to be having population-level impacts to wild Pacific salmon. So, no; I do not believe that technological innovation in ocean tenures is going to prevent harm to wild salmon.

The Transition Plan should focus on creating an appropriate regulatory framework for land-based recirculating aquaculture facilities and shellfish and seaweed farming. It should streamline applications processes and ensure that local capacity for monitoring and enforcement is enhanced, whether by First Nations or other coastal communities hosting such facilities.

As indicated above, I am adamantly opposed to so-called ‘semi-closed’, ‘hybrid’ and ‘offshore’ production systems, all of which are still dependent on open-net pens; and so I oppose the idea of a Transition Plan that would include any support for developing such systems. I would, however, approve of tax incentives for investment in land-based or regenerative aquaculture. Unfortunately, the public survey was so designed as to make this distinction impossible.
In summary: Wild salmon are in crisis and no ‘reduction’ of harm via tweaked legislation or ocean-based technology will save them. The risks open-net pens pose to wild salmon need to be eliminated. I expect that the government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,

s.19(1)
From: 
Sent: Tuesday, November 1, 2022 11:20 AM 
To: PAC Aquaculture Engagement / Engagement de laquaculture PAC (DFO/MPO) 
Subject: There is no future for marine-based salmon aquaculture in BC!

To the Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard (DFO):

*This letter is intended to form part of your public consultation process “Discussion framework for a BC aquaculture open-net pen transition plan”.

I write to urge you to keep your government’s promise to create “a responsible plan to transition from open-net pen salmon farming in coastal B.C. waters by 2025.” and to implement a transition plan that is centred on the conservation of wild pacific salmon and that includes:

A clear deadline for the removal of all open-net salmon farms in BC waters by 2025 or earlier;

A clear plan by which this removal will be achieved.

A statement that makes it clear that other in-water salmon aquaculture technologies, such as semi-closed or hybrid, will also not be permitted after the set deadline.

I have refrained from engaging in the public survey your department is currently running on this issue because I believe it is misleading and vague on its intentions. The survey uses misleading terminology, fails to define what type of salmon aquaculture is being referred to and the written feedback section reduces my ability to outline my concerns and suggestions to a space of only 140 characters to answer six or more questions.

Therefore, I find it difficult to answer without unintentionally supporting harmful in-water systems that will not address the major impacts current fish farms are having on wild pacific salmon populations.

The lack of transparency and potential hidden intentions behind this survey are extremely worrisome for me and the 75% percent of British Columbians that are in favour of removing any type of salmon aquaculture from BC waters (Insights West Poll 2021) and do not help to rebuild the trust lost on DFO’s processes around this issue.

- Wild Pacific salmon are in crisis and action is needed now. This transition plan needs to centre the recovery and conservation of pacific wild salmon stocks.

- The only proven technology known to fully eliminate interactions between farmed and wild fish is land-based aquaculture. Any other technologies will fail to accomplish this and continue to put wild salmon at risk.

- The government must engage authentically with coastal communities to mitigate the potential job losses, and create a community based plan to support individuals currently in the industry.

- The objectives and tactics around this transition plan need to be centred on the full implementation of UNDRIP.

I fully trust that as the Minister of the department, you intend to do the right thing for the fragile populations of wild pacific salmon, as well as for the people that depend on them. I believe that the time to take leadership is
now and the only person that can do that is you.

The only way forward is with open-net salmon aquaculture out of BC waters by 2025 at the latest.

s.19(1)
DFO Aquaculture transition consultation

Dear DFO Aquaculture transition consultation,

British Columbia’s wild salmon drive recreational fishing industries and wilderness tourism. They’re integral to aboriginal culture. Ocean-based factory fish farms threaten wild salmon and everyone that depends on them. Open-net salmon farms amplify parasites, viruses and bacteria and spread them to wild salmon, according to numerous peer-reviewed scientific studies published in independent journals. I want all salmon farms removed from B.C. coastal waters as soon as possible and no later than 2025.

The current federal government committed to transitioning open-net salmon farms by 2025. I expect them to do so without delay or half-measures. In recent DFO communications, semi-closed containment salmon farms have been mentioned as a possible solution or avenue for the transition despite any publicly available evidence that shows this technology is viable. Progressively minimizing or eliminating interactions between farm and wild salmon has also been touted by the federal government as a solution. We don’t have time for a protracted transition period. The open-net salmon farming industry had decades to clean-up their act. It’s time for them to transition completely out of coastal B.C. waters.

Another half-measure being touted by DFO as a solution is known as area based aquaculture management. This vague term suggests some unknown level of communication or coordination among open net salmon farms in a region will protect wild salmon. The time for stalling is over. All open net salmon farms must be removed by no later than 2025.

In addition, the open-net salmon farm transition should not just focus on shifting fish farm workers to another form of aquaculture. The transition should include shifting workers to other fields of employment that are currently in great need in British Columbia.

Wild salmon do not have time to spare. I call on you to do everything you can to remove factory fish farms from B.C. coastal waters by 2025 and keep your government’s promise to Canadians.

Thank you.

s.19(1)
Dear Fisheries & Oceans Canada,

I am hoping that you are busy rectifying the backwards actions being made by the Department of Fisheries and Oceans! It is absolutely unconscionable to imagine that the statements made in 2019 and 2020 have suddenly gone through a revamp, changing the obvious purpose of them, TO RID THE PACIFIC COAST OF CANADA OF OPEN-PENNED FISH FARMS BY 2025, to "we plan on starting to work on a transition plan by 2025"!!! What the hell is going on? We definitely CANNOT AFFORD to delay the eradication of fish farms in our oceans - not here in BC! Not anywhere in the world!!!

You must get on this immediately!!! It is downright criminal that the fish farm removals have been converted to something that only the fish farmers want. I don't care how much money they promise politicians!!! There is nothing that will bring back our wild salmon, once we let them suffer and diminish in population! DO IT NOW! Fish farmers are not your constituents! We are.

Sincerely,
From:  
Sent:  Thursday, November 3, 2022 11:56 PM  
To:  PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)  
Subject: Transition must ensure all open-net pen salmon farms are out by  

Dear Fisheries & Oceans Canada,

I am writing to share my input for the consultation survey on the BC aquaculture open-net pen transition plan. DFO’s multiple-choice survey is confusing to answer and appears to assume that ocean-based salmon farms are here to stay. This is in contrast to the federal government’s promise to “transition open-net pens from BC waters by 2025.”

Many salmon populations in BC are so severely depressed that they may become extinct if open-net pen salmon farms are not removed to prevent the harm they cause.

Salmon farm options, including “semi-closed,” “hybrid,” and “offshore,” as suggested in the survey, do not meet the federal government’s transition commitment. All of these systems still rely on open-net pens to grow fish to market size. They will not protect wild Pacific salmon from the parasites, pathogens, and pollutants that come from ocean-based salmon farms. If salmon farms are ‘semi-closed’, they’re still open and still cause a risk to wild Pacific salmon.

I ask you, as my representative, to ensure that the federal government follows through on its promise to remove open-net pen salmon farms from BC waters by 2025.

The transition plan should focus on creating appropriate regulatory frameworks for land-based recirculating aquaculture facilities, shellfish and seaweed farming. It should streamline the application processes and ensure local capacity for monitoring and enforcement, whether by First Nations or other coastal communities hosting such facilities.

The transition plan provides opportunity for reconciliation with First Nations, which should include restoring access for all Nations to the salmon resources on which their cultures depend. This includes the Indigenous peoples of the Interior of BC who have suffered the loss of the Fraser and Thompson River salmon. For First Nations affected by the removal of open-net pens, support for alternative economic development should be included in the transition plan.

The risks open-net pens pose to wild Pacific salmon need to be eliminated. I expect that the federal government will follow through on its promise and remove open-net pen salmon farms by 2025.

Sincerely,

s.19(1)
From: [Redacted]
Sent: Friday, November 4, 2022 2:04 PM
To: PAC Aquaculture Engagement / Engagement de la quaculture PAC (DFO/MPO)
Cc: Stern, Laura
Subject: Re: Transition Plan In-Person Engagement

Dear Brigid,

Only briefly to add that our system is designed to retrofit inside existing cages on existing farms, so effectively only a transition to a slightly different farming system, excluding sea lice and farm waste, rather than a transition away from traditional farming in traditional inshore sites.

Kind regards,

From: [Redacted]
Sent: Friday, November 4, 2022 5:37:56 PM
To: PAC Aquaculture Engagement / Engagement de la quaculture PAC (DFO/MPO)
Cc: Stern, Laura <Laura.Stern@dfo-mpo.gc.ca>
Subject: Re: Transition Plan In-Person Engagement

Dear Brigid,

Thank you for inviting me to attend the recent introduction zoom call.

We are a research and development business based in Scotland. We have developed and now patented a porous semi closed contained salmon aquaculture system (designed to 100% exclude sea lice) which is just now undergoing first sea trials in Ireland with the Marine Institute there.

We thought this may be of interest to your group and we published some of our work on our Web site www.salarpursuits.co.uk.

We will not be able to attend Campbell River meeting, but would be happy to join any further zoom meetings if anyone has questions for us about our system.

Kind regards,

Salar Pursuits Ltd,
Angus, Scotland.
From: PAC Aquaculture Engagement / Engagement de la aquaculture PAC (DFO/MPO)  
<DFOPACAquacultureEngagement-EngagementdelaquaculturePAC.MPO@dfo-mpo.gc.ca>  
Sent: Thursday, November 3, 2022 4:02:20 PM  
Cc: Stern, Laura <Laura.Stern@dfo-mpo.gc.ca>  
Subject: Transition Plan In-Person Engagement

Good morning,

Thank you to those that were able to attend our planning session earlier this week.

As per our discussion, we are looking to schedule a full day in-person engagement session in Campbell River. At this time we would like to schedule one session, then another virtual session can be scheduled as needed. Please fill out this Doodlepoll with your availability on the suggested dates.

Please respond to the Doodle Poll by this Friday the 4th end of day. We will settle on a date and send out the calendar invite next week.
Again, let us know if there is someone else that should be added to this group or if you would like to be removed from this list.

Looking forward to connecting.  
https://doodle.com/meeting/participate/id/aMw9w6Od

Kinds regards,

Brigid Prouse (she/her | elle/la)  
Senior Project & Engagement Coordinator  
Fisheries and Oceans Canada, Pacific Region, Government of Canada  
brigid.prouse@dfo-mpo.gc.ca

Agent principal régional de gestion des pêches et de  
Pêches et Océans Canada, région du Pacifique, Gouvernement du Canada

Gratefully living and working from the unceded traditional territory of the Coast Salish Peoples, including the traditional territories of xʷməθkʷəy̓əm (Musqueam), Sḵwx̱wú7mesh (Squamish), and Səl̓ílwətaɁ (Tsleil-Waututh) Nations.
### Campaign Tracker

<table>
<thead>
<tr>
<th>Campaign Organization Name</th>
<th>Number of Emails</th>
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<tbody>
<tr>
<td>David Suzuki Foundation</td>
<td>4264</td>
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<tr>
<td>Georgia Strait Alliance</td>
<td>3703</td>
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<tr>
<td>Wild First</td>
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<tr>
<td>Watershed Watch</td>
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<td>Clayoquot Action</td>
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<td>Living Oceans Society</td>
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<tr>
<td>Uncategorized</td>
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**Total Emails Received** 14722

Note: In addition to the campaign text, some emails included short personalized comments.