



August 13, 2020

The Honourable John Horgan
Premier of British Columbia
West Annex Parliament Buildings
Victoria, B.C. V8V 1X4

Dear Premier Horgan,

The Pacific Salmon Foundation (PSF) is writing to add our support for the concerns and objectives expressed in a recent letter from a co-operative group of commercial and recreational fishing organizations, religious organizations, marine tourism operators and environmental groups.

PSF strives to be an independent, non-partisan and non-adversarial organization focused solely on the conservation and restoration of Pacific salmon. In general, we avoid taking advocacy positions, but in 2018, we concluded that the demonstrated risks to Pacific salmon from Open-Net-Pen (ONP) aquaculture are such that a move to closed-containment aquaculture is required¹. Given the crisis situation facing many Pacific salmon stocks, we were very pleased with the federal Liberal's election commitment to move to closed containment² and the Province of BC's steps to transition to sustainable aquaculture³. We reiterate our strong encouragement that your governments proceed with these convictions as quickly as possible for the benefit of wild salmon.

We also wish to emphasize two elements from the letter:

- 1) **Unnatural Sea Lice Loads on Out-migrating Smolts Reported from Discovery Islands:** "Infestations at these levels are lethal and no regulatory or therapeutic measure employed by the Department or industry has been effective to control them. This is not surprising; no salmon farming region in the world has been able to control lice. No other salmon farming region in the world still has commercially viable stocks of wild salmonids, either." And,
- 2) **September 2020 Cohen Commission Deadline to Prohibit Discovery Islands Farms:** The quotation of Recommendations 19 from the 2012 Cohen Commission of Inquiry into Decline of Sockeye Salmon in the Fraser River.

Regarding #1, we agree that the issue of controlling sea lice is of paramount importance in achieving sustainable salmon aquaculture, and to the above statement, we should add that as an external parasite, sea lice can also be vector for other pathogens. Regarding #2, our PSF position statement already supports Recommendation 19 of Cohen. Add to these issues, your stated support for the restoration of wild Pacific salmon in British Columbia, and your commitments to reconciliation with Canada's First Nations, it is clear that we have very challenging times ahead.

¹ <https://www.psf.ca/news-media/pacific-salmon-foundation-position-aquaculture-bc> (May 2018)

² <https://www2.liberal.ca/our-platform/healthy-oceans/> (July 2019)

³ <https://news.gov.bc.ca/factsheets/salmon-aquaculture-in-British-Columbia#> (Feb. 2019).

To this end, PSF acknowledged in our Position Statement (May 2018) that change is unlikely to happen quickly or easily but that we are prepared to assist if requested. Indeed, our Science Advisor, Dr. Brian Riddell, has suggested a 5-point plan that could benefit wild salmon and engage dependent communities, during a transition period.

PSF Transition Recommendation: While a transition plan to closed containment is completed over the next few years, a 5-point plan for the interim period would protect BC's wild salmon and provide for the transition:

- 1. Establish Production Area Management Plans for each geographic region involving open-net salmon aquaculture. A multi-sector management committee within each area would determine the production capacity of farmed salmon, determine monitoring and assessments programs, and determine required fallowing periods between production cycles.*
- 2. Utilize RSA technologies and targeted growth trajectories to produce larger smolts for a production cycle that will minimize interactions with wild Pacific salmon; including fallowing of farm sites when juvenile wild salmon are most vulnerable in each Management Area.*
- 3. In collaboration with communities and industries within each area, build projects to restore salmon habitats to improve the abundance and health of wild Pacific salmon and their ecosystems.*
- 4. Monitor, share information, and adapt. An intensive monitoring system should be established to assess rearing conditions and interactions between farmed and wild salmon. In each area, local area evaluation teams would collate, review, and adjust to the information collected.*
- 5. In the absence of strong proof otherwise, and given the current state of many salmon populations in southern BC, immediately and significantly reduce the number of open-net pen sites in the Discovery Islands and Johnstone Strait.*

We would be pleased to discuss collaboration in implementing the plan to begin transition to a more sustainable aquaculture industry along the BC coast.

In closing, PSF is mindful that the science around open-net-pen aquaculture is contentious, but it is our belief that the precautionary principle should be applied to ensure minimal risk to Pacific salmon. It would be our hope that PSF's past advice impressed upon you the need for a move to closed-containment expeditiously. As we have said on numerous occasions, PSF is committed to providing you counsel and support on this critically important issue for Pacific salmon.

Sincerely,



Michael J. Meneer
President & CEO

- cc. The Right Honourable Justin Trudeau, Prime Minister of Canada
The Honourable Lana Popham, Minister of Agriculture, British Columbia
Kevin Nugent, PSF Chair
Dr. Brian Riddell, PSF Science Advisor