

BC Federation of Fly Fishers
Submission to Standing Committee on Sustainable Aquaculture
October 7, 2006

The BC Federation of Fly Fishers (BCFFF) was founded over thirty years ago and its membership, approximately 600 members, is composed of clubs and individuals from all regions of the province. Many of our members fish the saltwater either from boats or shore with the targeted species primarily being coho and pink salmon as well as cutthroat trout.

Over the years the BCFFF has followed the debate over the negative impacts that can result from salmon farming. Many non-government organizations and individuals have presented extensive commentary illuminating the potential problems that can arise from fish farming, be those risks from escaped fish, parasites, disease transfer or pollution. **BCFFF's position is that the given their current practices, salmon farms can pose a risk to wild salmon stocks, particularly pink and chum**, not to mention the possibility of affecting steelhead and cutthroat trout.

The public has repeatedly been told that salmon farms do not pose a risk to wild fish stocks or the environment. We were told that escaped Atlantic salmon would not survive, would not spawn and, if they did spawn, the fry would not survive. Not only have escaped Atlantic salmon been found to survive, their fry have been found in a number of our rivers where they may compete with native salmonid

In recent years numerous non-government organizations have been ringing the alarm bells as various studies (both here and abroad) indicate problems for wild stocks of salmonids, and their habitats, from salmon farming. Recently, on our coast, sea lice concentrations around salmon farms have been exploding and as a result migrating fry are reported to be dying; not surprisingly the aquaculture industry disputes these findings. What is surprising is that both the Federal and Provincial governments seem determined to ignore the implications of these studies while at the same time professing in various planning documents to take a "precautionary" approach when managing for the protection of wild salmonids.

The connection between salmon farms, sea lice and the collapse of wild salmonid stocks is not new science. In Europe the devastation caused to the wild stocks of sea trout and Atlantic salmon from the explosion of sea lice populations due to salmon farms has been well documented, yet our Federal and provincial governments seem to feel this just cannot happen here.

Over the last six years sports fishermen have noticed an unprecedented decline in the numbers of pink salmon appearing off the beaches of Northern Vancouver Island. Fisheries and Oceans Canada have reported drastic declines in pink salmon stocks from this area. Independent scientists studying the effects of sea lice populations on migrating salmon fry, report that pink salmon fry in this region are heavily infected with sea lice. Given the European experience with salmon farming and current studies on the situation

in B.C., in our view there is a very apparent connection between the decline in the pink salmon stocks and coastal fish farms – certainly this is enough for governments to take a more cautious approach to salmon farming, one that limits the operation of some farms and eliminates others while putting a moratorium on all salmon farming is not out of the question.

The responsibility for wild salmon is a Federal whereas aquaculture is in the Provincial jurisdiction. It is therefore our contention that neither governments are acting in a manner that adequately protects stocks of wild salmon. In fact, current management practices put wild stocks, a resource that belongs to us all, at risk for the economic benefit derived by the salmon farming industry. On aquaculture, the Provincial Ministry of Agriculture website states, “The B.C. government supports the sustainable development of the aquaculture industry. This means acknowledging aquaculture as a legitimate user of the coastal resource, basing decisions on sound science and ensuring sustainable practices.” If the government truly believes its own rhetoric then they should be following a precautionary approach regarding the impact of fish farms on wild fish. Decisions should err on the side of conservation. Given the stress that wild salmonids are subjected to from escalating habitat loss, the unknown effect of climate change and a decline in ocean survival, the need to pursue a conservative, precautionary approach to expansion of open ocean net fish farms has never been stronger

It is the position of our organization that:

- there should be a moratorium on additional fish farm tenures until policies and regulations are developed that address the issues of escapement, sea lice and pollution, and ensure the viability of wild salmon.
- there is a need to increase monitoring and strict regulations enforcement of fish farm sites by government, not reliance on the self monitoring that is in place now. We do not believe that any industry can be adequately self-policing.
- there should be a review and development of other options to salmon farming that would include looking and better management of wild salmon stocks, close pen land based salmon farms