

July 31, 2006

BC Pacific Salmon Forum  
c/o Pam Parker  
L - 427 Fitzwilliam St  
Nanaimo BC V9R 3A9

Re: Ministry of Agriculture and Lands Response to "An Audit of the Management of Salmon Aquaculture for the Protection of Wild Salmon in British Columbia" By Gareth Porter

The Ministry of Agriculture and Lands would like to acknowledge the BC Pacific Salmon Forum for undertaking this initiative and Mr. Porter's effort, in a very short time, to try to understand management of salmon farming in British Columbia.

Audits and reviews can be informative and we are always seeking information that could lead to improvements in our management of salmon aquaculture.

As indicated in the report, there was contact with federal and provincial staff during its preparation. We do not want to re-iterate those discussions here. In general, we would have preferred to see an audit that focused on outcomes and not simply on whether or not a specific action was prescribed in regulation.

There are two main points that we would like to highlight for the BC Pacific Salmon Forum:

1. British Columbia has adopted primarily a performance-based and not a prescriptive-based approach to management of salmon aquaculture. The performance-based approach relies on setting standards, monitoring, auditing and adaptive management. This differs fundamentally from the other jurisdictions to which the consultant has previously applied his criteria, and
2. The criteria applied in the report did not acknowledge the benefits of a performance-based management system and of the Fish Health Management Program and how the Fish Health Management Plan has full regulatory force because it is a condition of licence.

We would be happy to work with the BC Pacific Salmon Forum to clarify how we believe that British Columbia's regulatory regime meets the intent of the various criteria and indicators relied on by the consultant in his evaluation.

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We would also encourage readers of this report to visit our website at:  
<http://www.agf.gov.bc.ca/fisheries/index.htm> to learn more about British Columbia salmon  
aquaculture, our aquaculture regulatory framework and our management of the industry.

Yours sincerely,



Dr. Al Castledine  
Director  
Aquaculture Development Branch



Ms. Jaclynn Hunter  
Director  
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Dr. Joanne Constantine  
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Animal Health Branch