



Fisheries
and Oceans

Pêches
et Océans

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4270-01

JUL 13 2006

Ms. Pamela Parker
Managing Director
BC Pacific Salmon Forum
L - 427 Fitzwilliam Street
Nanaimo, BC
V9R 3A9

Dear Ms. Parker:

**SUBJECT: FISHERIES AND OCEANS CANADA RESPONSE TO "AN
AUDIT OF THE MANAGEMENT OF SALMON AQUACULTURE FOR THE
PROTECTION OF WILD SALMON IN BRITISH COLUMBIA" BY GARETH
PORTER**

I am writing in response to the report entitled An Audit of the Management of Salmon Aquaculture for the Protection of Wild Salmon in British Columbia prepared for the Pacific Salmon Forum by Gareth Porter. I have reviewed the report after previously participating in providing material to the report's author.

While I applaud the Pacific Salmon Forum for undertaking a review of the regulatory regime for salmon aquaculture in BC, I do have concerns over a number of the assessments in the report. In particular, I believe the scores reached for Criteria 1, 2, 3, 4, and 5 do not accurately reflect the level of regulatory control placed on the industry in BC. Criteria 1 & 2 are within the DFO mandate for aquaculture management in BC so I will address them in more detail. Criteria 3, 4 and 5 are within the purview of provincial agencies and I leave it to those agencies to address them in their response.

In response to the score reached for Criterion One:

Adoption of a siting policy aimed at keeping aquaculture at a safe distance from salmon rivers.

I am unsure of the reasoning behind the conclusion that the siting buffer does not protect a single salmon river. In my opinion the siting buffer of 1km as currently applied affords some measure of protection for all salmon rivers. Furthermore, I

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would like to draw the attention of the Forum and readers of the report to the recently released DFO - Wild Salmon Policy that clearly states that *if specific Conservation Units of wild salmon are threatened by aquaculture operations, corrective actions will be taken under the Fisheries Act or longer-term solutions will be pursued as part an integrated planning process.* This confirms DFO's policy that the long term viability of wild salmon will take precedence in aquaculture management and siting decisions.

In response to the score reached for Criterion Two.

Degree to which cumulative environmental impacts of salmon farming on an entire bay or other ecosystem are considered in siting decisions

I was pleased that the author took into account the mandated requirement under the *Canadian Environmental Assessment Act* (CEAA) to consider cumulative effects of a project. I would however argue that these assessments are based on science. Cumulative Effects Assessments for aquaculture sites consider those ecosystem components for which a determination of low or medium impact has been reached in the environmental assessment of the project. Those ecosystem components are assessed against the cumulative impacts of other projects in the area, both current and foreseeable, and then a determination is made as to the level of cumulative effect. The initial determination of those effects in the environmental assessment is based on the best scientific advice available.

The Forum and readers of the report should also be aware that in BC farms must located no less than one kilometer from each other if there are owned by the same company and no less than 3km from each other if they are owned by different companies. This mandated siting buffer reduces the likelihood and severity of cumulative effects by spacing farms out and reduces the likelihood that two farms would share a bay.

Thank-you for the opportunity to comment on the report.

Yours sincerely,



Andrew Thomson
A/Director, Aquaculture Management Division

cc: P. Sprout
D.D. Radford
T. Davis

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