

To the Cohen Commission,

My Name is Leona Adams and this submission is on behalf of the Campbell River Estuary Protection Group.

Regarding: The Decline of the Sockeye Salmon in the Fraser.

We are addressing two questions:

1. What is required to secure the future of the Fraser Sockeye?
2. What are the major habitat issues for Fraser Sockeye and how can these be mitigated?

We were informed by Trevor Swerdfager of the DFO, at a meeting held in Campbell River in December 2009 that the DFO's mandate was to regulate and promote open net fish farms.

The C.R. Estuary Protection Group believe what is required to secure the future of the Fraser Sockeye is the DFO no longer be a regulating and open net fish farm promotional body. This mandate is clearly a conflict of interest, putting caring DFO personal in a difficult position.

This conflict of interest has led the DFO to make habitat choices based on concern for the open net fish farms economic bottom line. These choices have not been healthy ones for the Fraser Sockeye Salmon.

This conflict of interest has led the DFO to ignore:

1. The recommendation of the 2007 Special Committee on Sustainable Aquaculture to move open net fish farms into closed containment.
2. A letter of September 2007 by 19 scientists asking for open net fish farms to be removed from the migration routes and into closed containment.
3. A recent 2010 convention of scientist worldwide whose consensus was that Atlantic will develop resistance to Slice, the toxic chemical used at open net fish farms to treat sea lice.
4. A recent 2010 study partially funded by the Province and the DFO by Dr. Andrew Wright which pointed out that a move to closed containment was economically, socially and environmentally beneficial.

We realize that there are more factors in the 2009 collapse of the Fraser Sockeye than open net fish farms, but since the collapse was greater through the inside passage where the concentration of open net fish farms are located, it is our belief that they are a significant part of the problem and therefore it would be beneficial to move open net fish farms into closed containment.

A major habitat issue for the Fraser Sockeye is the densities allowed in open net fish farms. We are told by scientist that the 2001-2003 IHN disease outbreak in the BC fish farms and the recent ISA disease in Chile was caused by high densities in the farms. DFO's 5 year Strategic Action Plan Initiative states "there exists a tremendous potential for expansion." Expansion means greater densities in open net fish farms, leading to future disease.

A major habitat issue for the Fraser Sockeye is that DFO's conflict of interest has led to a decision to not require open net fish farms to abide by the Canadian Fisheries Act. Instead of having open net fish farms move to closed containment where they could abide by the Canadian Fisheries Act, special Federal Pacific Aquaculture Regulations were recently written for fin fish farms.

This decision threatens the habitat of the Fraser Sockeye in that:

1. Sea lice are allowed to be passed onto out-migrating smolts.
2. By Catch in the farms will still occur.
3. The fish farm industry is not required to report disease in a thorough and open manner.
4. The toxic chemical "Slice" fed to the Atlantics can be deposited into the ocean.
5. In the new Federal Pacific Aquaculture Regulations, the Minister may authorize deleterious deposits of fish feed, fish fecal matter, disinfectants, anti-foulants and waste water into the ocean.

To mitigate these habitat issues, we ask the Cohen Commission to find that:

Full, thorough and open reporting of sea lice and disease information in fish farms is essential to the health of the Fraser Sockeye.

Densities in open net fish farms must be kept low.

Open net fish farms cause significant harm to the habitat of the Fraser Sockeye.

All fish farms must be moved off the migration routes and into closed containment.

The DFO be strictly a regulatory body.

All industries be required to abide by the current Canadian Fisheries Act.

Thank you for your time.

Leona Adams,
On Behalf of the Campbell River Estuary Protection Group

