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Summary:

Open net-cage salmon feedlots are killing our wild salmon in plain view of Fisheries and Oceans Canada (DFO) which has the impossible dual responsibilities of promoting aquaculture and protecting wild salmon. Promotion of aquaculture should be transferred from DFO to another ministry.

Submission:

It is clear that DFO abandoned the internationally accepted Precautionary Principle with respect to the current open net-cage salmon feedlot industry, since over the last ten years many peer-reviewed scientific papers have described in detail the damage being done to wild salmon and its habitat from open net-cage feedlots. These feedlots should be completely removed from our oceans.

DFO is in the impossible position of promoting aquaculture and protecting wild fish and has made the incredibly bad decision of favouring current practices of raising Atlantic salmon in open net-cages over protecting our wild salmon, knowing that facilitating the former is destroying the latter. This myopic stance is thoroughly enraging to those of us who rely on our elected officials and their departments to protect our wild environment and then observe the opposite. One commission recommendation should be to move responsibility for aquaculture from DFO to a ministry responsible for, say, business development. DFO must be strongly re-directed to protect our natural environment, especially that of our incredible wild Pacific salmon, which in turn support Aboriginal cultural practices in place for thousands of years throughout the entire Fraser River watershed.

Negative impacts of current salmon feedlot practices are so far-reaching that their discussion has to go beyond direct effects on wild salmon; please consider each of the following points:

1. Producing one kilogram of farmed Atlantic salmon consumes more than one kilogram of other wild fish products. Harvesting the other wild fish products is depleting critical components of the ocean food chain off the west coast of South America, arguably a place where BC's Pacific wild salmon feed (nobody knows for sure where they feed.)
2. Sea lice, transferred to feedlot fish by migrating mature wild salmon, breed very quickly on their captive hosts. Feedlot operators address this problem by adding the chemical SLICE to food pellets. SLICE contains a strong pesticide and consequences of its use have not been adequately studied. SLICE is detrimental to all crustaceans: uneaten food pellets kill shellfish on the ocean floor under the cages.
3. Perhaps the most damaging effect of sea lice is their transfer from feedlot fish to migrating wild smolts. The presence of the open net-cages in the path of migrating smolts adds a deadly and unnatural factor to the wild salmon's life cycle: deadly because these very young salmon don't have scales yet and can be killed by very few lice; unnatural because in their normal life cycle the smolts would not encounter so many lice - the lice on their adult parents would die in the fresh water rivers and streams during the fall adult migration.
4. Feedlot salmon in open net-cages are injected and fed with antibiotics and ingest chemical colourants. Antibiotics may remain in their feces, and uneaten food pellets allow antibiotics to

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enter the open ocean. I don't know if anyone understands the consequences of such a reckless practice.

5. Bodily wastes from open net-cages damage the natural environment. Millions of feedlot salmon of all ages produce a very large amount of waste material that can do nothing but pollute our once pristine ocean floor, destroying the food needed by every creature living there, including wild salmon smolts. Since the arrival of open net-cage salmon feedlots in their territories, Aboriginal peoples of the southern B.C. coast have lost the use of shellfish beds they have cultivated for thousands of years.
6. Feedlot fish are transported to processing plants in different ocean locations - many raised on the west coast of Vancouver Island are processed on the east coast of the Island where unused flesh and liquids are disposed of in the ocean, transferring any disease the west coast fish may have into east coast waters.
7. Open net-cage salmon feedlots are killing ocean mammals. Seals and other ocean mammals do what comes naturally - try to catch fish, but many have become entangled in the open nets and drowned. Salmon feedlot workers have shot hundreds of seals.
8. Farmed salmon operators withhold disease and sea lice statistical data from governments and the public. Although a recent B.C. court decision granted a freedom of information request to environmental groups requesting such data from B.C. salmon feedlots (information the feedlots had withheld for six years), the feedlots are currently withholding all such new data from the B.C. government and the public of Canada. We can only conclude that the disease and lice situation on the feedlots is severe and out of control.

I hope the commission will agree the above points describe an unsustainable industry with devastating impacts on wild salmon.

Attachments:

1. The first page of the Summary of Recommendations to the B.C. Legislature in the Special Committee on Sustainable Aquaculture's Final Report 2007, in which the first recommendation is transfer of open net-cages to closed containment within three years.
2. The August 30, 2010 joint submission by many environmental organizations to the Canadian General Standards Board containing discussions of some of the above issues.
3. A February 18, 2010 news release from the Union of B.C. Indian Chiefs confirming its position on wild salmon vis-a-vis fish farms.
4. An editorial by broadcaster Rafe Mair from www.thecanadian.org defending biologist Alexandra Morton, www.raincoastresearch.org and her work to expose the dangers of open net-cage salmon farms to wild salmon, for which she was given an honorary Doctor of Science degree by Simon Fraser University on June 16, 2010.

(Samples of Ms. Morton's work corroborating many of the above points can be viewed via the amazing videos on Twyla Roscovich's website, www.callingfromthecoast.com, with its beautiful albeit heartbreaking scenes of Broughton Archipelago wild salmon smolts before and after swimming near open net-cage salmon feedlots.)