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Dear Mr. Gilbert

From a desk in Ottawa the statistics on Aquaculture deceptively appear to occupy just a tiny area of our coast and produce excessive positive results. Without a true understanding of the realities of the coast, it is understandable that this looks like a good idea. What you don't understand is that it is these tiny areas that are critical and the excessive results have proven to be disastrous, not positive, on many levels. The sites are not chosen at random. They must provide some form of shelter or water. Despite the fact that an aerial view of our coast would appear to support endless opportunities for shelter, this is not the reality. It takes a very complicated combination of circumstances to afford shelter from winds and tides and to provide useable anchoring depths and bottom configurations. Streams and water sources are poisoned in the very locations that salmon and herring spawn, conservation areas have been established for rockfish and that have any future potential to support human habitation. Not all water is created equal and sites cannot be simply lumped into categories without true local knowledge. Water is not land and it is a mistake to regard it as such. Water uses are defined by Canadian historic rights and we are determined to protect them here in BC.

*(As such, the NASAPI is simply a list of actions necessary to advance sustainable development based on the core principles of environmental protection.)*

Based on the core principles of environmental protection, the starting point to advance the sustainable development of Aquaculture in BC is actions to place the feedlots ON LAND. This is Ground Zero for any policies acceptable to the people of BC.

*(Over the last two years, more than three dozen meetings have been held in all regions of Canada to gather input regarding the over-arching goals and principles for the NASAPI and to identify specific issues to be targeted in the Strategic Action Plans.)*

Considering the sweeping changes that this will bring to Canadian laws, the three dozen meetings that were held translate to only 3 or 4 per Province. The ones that I was aware of in BC were small meetings in small communities attended mostly by a selection of invited industry supporters. These were the "stakeholders" consulted. These are the Strategic Action Plans that were derived from those meetings. The public was largely uninformed of these proceedings and are still not made properly aware of these proposed changes. Changes that will impact the entire coast and their children's future

*(Implementation of the Strategic Action Plans will be lead by collaborative teams within each province and territory. It is at this level that specific work related to policies, regulations, etc, will be conducted.)*

The people of BC proved in court that our historic Canadian laws did not give the BC government the mandate to permit private fisheries in public waters. We did not go through this

process simply for the purpose of pointing out the actions necessary to degrade the Canadian laws that protect our rights of marine access and fish environment.

*(Several weeks ago, we discussed the need to secure input from BC non-governmental organizations.)*

Where have you been? Only two weeks ago it occurred to you to include non-governmental organizations? The opinions of the people of BC regarding salmon Aquaculture were given at the "Get Out Migration" in May, 2010. In case you missed it, over 4,000 people showed up at the legislative buildings in Victoria to demand that our wild fish be better protected, not the fish farmers.

*(Due to the court-imposed need to develop a federal Pacific Aquaculture Regulation, the NASAPI exercise in BC has been slower to develop than in the rest of the country.)*

Why does this feel like being railroaded into submission by a government determined to bring us in line with other parts of the country whether we like it or not for the sake of bureaucratic consistency? You cannot blame us for wanting this done right after all the effort that it has taken to make you even begin to look at the issues.

*(Aquatic resources have been integral to the historical, economic and cultural fabric of Canada's coastal communities. They provide a strong and reliable resource base around which Canada's national economy and sense of nationhood grew.)*

It is this very strong, reliable resource base that we are trying to protect in BC. To be able to continue our history, economy and culture without having to fend off destructive policies from those who are sworn to work in our best interests.

*(The Canadian Council of Fisheries and Aquaculture Ministers recognizes aquaculture as a legitimate use of Canada's aquatic resources.)*

The people of BC have come to believe that the Fisheries and Aquaculture Ministers are proceeding in the best interests of the Aquaculture industry and not listening to our legitimate objections nor recognizing the legitimate threat to BC's aquatic resources. The existing NASAPI draft document is insulting to the efforts of those British Columbians who have personally invested a great amount of unpaid time and energy to bring the concerns of local residents to the attention of Federal Ministers. Positive solutions are possible but the Ministers are holding to the old agendas; agendas announced just days after public comments were closed on the pending Federal Aquaculture Regulations; apparently prepared well in advance of final public opinion analysis and the findings of the Cohen Commission. Proposed changes to the Provincial Environmental Protections were also posted on Sept 13, 2010 at the Provincial Environment Ministers website, coincidentally the same date as the NASAPI document, in spite of a freeze on any Provincial actions regarding aquaculture changes. Why do I get the feeling that everything has already been decided and that the NASAPI and other similar offerings are merely meaningless exercises?

*(As a renewable resource sector, sustainable aquaculture is stimulating regional economic development.)*

I believe the opposite to be true. Both the product and the profits are shipped out of BC while the locals are denied and the southern oceans are raped to provide the feed for corporate dividends. Tourism and sport fishing is falling off due to the lack of wild fish. Community infrastructures have crumbled that build, maintain and supply small vessels. New communities cannot locate because strategic locations for water sources and storm protection are occupied by Aquaculture. Salmon feedlots and deep water shellfish rafts provide ugly waterfront views, effectively stopping any residential or other initiatives.

*(As a source of nutritious, heart-smart products, aquaculture is contributing toward healthy lifestyles for consumers.)*

Have you not heard about virus and disease issues? Chemical and antibiotic treatments? It is difficult to find anyone in BC who will eat the feedlot fish. We know better. There are also serious health and environmental risks from BC shellfish. Further information on local knowledge regarding shellfish can be found at <http://www.responsibleshellfishfarming.ca/maintable.htm>

*(Clearly, sustainable aquaculture is good for Canada.)*

This is possibly the only statement that can be fully agreed with. Fish and shellfish farms ON LAND can supply jobs and protein without interfering with our waterways, our wild fish or the marine environment. We can have it all. The people of BC will fight tooth and nail to protect our waterways and our wild fish. We WILL deny our land under water to be used and abused to our detriment. If you are truly seeking cooperation and collaboration for strategic action plans in BC, this is where you must begin. Engage the people to begin to establish LAND- based aquaculture policies. There are many people on the coast who have great local knowledge and scientific innovations to offer that would gladly help. This would also save you the necessity to change all of the marine protections presently existing in Canadian law.

*(The NASAPI will enhance operational efficiency and effectiveness and improve industry and public management in support of sustainable aquaculture development for the benefit of all Canadians.)*

As I interpret this document, it is blatantly supplying the means to better protect the Aquaculture industry and outlining the necessary steps to be taken to further degrade the historic environmental and navigational protections. This is not for the benefit of all Canadians. It is for the benefit of the industry and for the benefit of the bureaucratic process that is aware that what it is doing is unconstitutional. Most people in BC still believe that they own the water up to the Higher High Water mark and have the constitutional rights of beach access and water enjoyment. Have you told them otherwise and of your plans to arbitrarily remove more of these rights from them without having to ask and at your discretion? I can see where these changes would make your job easier.

*(Commercial aquaculture in Canada began more than 50 years ago with trout farming in Ontario, Quebec and British Columbia and oyster farming in New Brunswick, Nova Scotia, Prince Edward Island and British Columbia.)*

If this is quoted as precedent setting for current actions, I would remind you that trout farming is done in fresh water on LAND, not in exposed ocean net pens and that oyster farming was a small beach undertaking usually done by the upland property owners, not consisting of giant farms with up to 300 hectares (over 700 acres) of floating rafts occupying navigational waterways. LAND-based Aquaculture is acceptable to most British Columbians. These are the Regulations that we want and need.

*(During the 1980s, aquaculture output increased dramatically due mainly to growth in salmon farming in BC and NB.)*

Aquaculture output increased dramatically in BC due to secretive, unconstitutional government policies and procedures that effectively eliminated the true owners and users of our waterways in the process and favoured the growth of the industry. While we took it for granted that the laws of Canada were being upheld, secretive policies that promoted the industry forward without our participation were at work. It is these policies that require change, not the laws of water uses and protections.

*(Additionally, more than a dozen First Nations are involved in aquaculture for food, social, ceremonial and/or commercial purposes.)*

All Nations inevitably have those who would choose short sighted greed over long term stewardship and sustainability. First Nations is no exception. The vast majority of the coastal First Nations are NOT in favour of the present forms of aquaculture. Are you planning to consult the Second Nations as well?

*(Salmon is the main species produced on Canadian farms, accounting for 73% of total production volume, followed by mussels (14%), oysters (5%), trout (5%) and other finfish (5%). British Columbia contributes the most farm-raised fish and seafood.)*

Atlantic Salmon are an inferior, aggressive fish “produced” in feedlots, raised in competition with the natural resources of BC, threatening our entire environment with viruses, diseases, pollution and obstruction of ocean spaces. Shellfish farms have commandeered acres of anchorages, leaving vessels with fewer safety alternatives. BC has contributed the most farm-raised fish and seafood, therefore has suffered the worst impact. Nevertheless, we are being railroaded into a national package that tries to cover trout in Ontario lakes, char in the frozen north, seaweed in Newfoundland, and salmon in the open ocean in BC.

*(Moreover, aquaculture occurs primarily in Canadian coastal and rural communities - areas where economic development opportunities can be limited and elusive.)*

(BC has THE most extensive system of protected navigable waterways in the world. Coastal communities rely on the waterways for transportation. The insidious intrusion of aquaculture and

its supporting policies is one of the reasons why economic development opportunities have been limited and elusive. Aquaculture has displaced any other development. People are denied licences of occupation. It is a shameful truth that the life of our coastal communities has deteriorated directly due to government policies that promote large industries and exclude the people. With a coast as rich as ours, we can only blame the mismanagement of our natural resources for the declining economic development. This comes from listening too much to the industry spin doctors and being out of touch with the people.

*(However, in Canada's drive to advance aquaculture, the broader objectives of Canadian society must be upheld; that is, aquaculture development must preserve environmental integrity while also respecting the social fabric of coastal and rural communities, including the culture and traditions of Canada's First Nations and Aboriginal peoples.)*

There is much more positive economic potential in our future if we preserve our watersheds and waterways than there is if we continue to pursue the present false economics of open net finfish Aquaculture and the giant floating, ugly hazards of shellfish Aquaculture. You have mistakenly regarded the marine transportation value of our waterways as recreational, the economic value of our fish as they pertain to commercial fishermen only and our open ocean spaces as something to be filled with dangerous pollutants and disease threats.

*(First, aquaculture producers must continue to develop, adopt and demonstrate the use of sustainable technologies and practices.)*

That must most definitely happen first. Aquaculture producers are stubbornly refusing to comply with land based technology and continue to deny the threat that their current operations impose. They refuse disease records and claim to be farmers and not feedlot operators, seeking the "right to farm" as superior to our rights of navigation and water protection. Shellfish rafts in ocean spaces are subject to wind and weather forces, blockade anchorages and aesthetically destroy the environment, often creating dangerous, unlit hazards to navigation. The current trend towards massive water areas covered in floating hazards is simply unacceptable. When you consider that the vast majority of aquaculture producers are foreign owned and that both the product and the profits are shipped out of BC, why are we bending over backwards to rewrite the constitution of Canada for the sake of 5,000 jobs which could be absorbed by developing LAND- based Canadian technologies?

*(Additionally, governments must create an enabling environment in which aquaculture can prosper, provided that public responsibilities such as health and safety, navigation and environmental sustainability are upheld.)*

If this is truly your intention, the proposed document fails miserably to meet that objective. If you begin at Ground Zero (LAND- based Aquaculture), you will have the support, gratitude and cooperation of the people. It would be a tremendous cost saving measure if you would stop wasting public time and energy defending an unconstitutional industry against the people who must live with the consequences. We did not go through the process of throwing out the Provincial mandate on Federal grounds only to have the Federal government rewrite the

constitution to support an unwanted industry. If we had wanted to maintain the status quo, we would have left well enough alone at the Provincial level. It is change that we seek and the reinforcement of our water rights and protections for future generations of Canadians.

*Moreover, aquaculture development “has been of the win-win type, as both producers and consumers have gained when prices for cultured species have fallen as a result of increased production.”*

Aquaculture development has been lose/lose for British Columbians as prices have fallen for the fishermen and the supporting infrastructure jobs have atrophied. Consumers have reaped no benefit because we do not consume farmed fish.

***Supplying quality products and generating rural and coastal prosperity through environmentally-, socially- and economically-sustainable and responsible aquaculture development that upholds public confidence.***

This mission statement is unobtainable for Aquaculture in BC in its present form. Public lack of confidence has evolved due to documents such as this which have conspired to destroy rural and coastal prosperity, threaten the environment, damage social relationships and obliterate the economy. These non-sustainable methods have only succeeded in supplying an inferior product which British Columbians will not eat.

*Through the Canadian Council of Fisheries and Aquaculture Ministers (CCFAM), the Ministers are intent upon:*

- *Identifying and establishing common goals;*
- *Coordinating public policy objectives;*
- *Improving consultations and information sharing on inter-jurisdictional matters; and*
- *Improving resource management and services to the sector and the public.*

The proposed NASAPI draft does not meet your stated objectives. If you sincerely desire communications that express the will of the people as opposed to the will of the Ministers, I will be happy to attend the meeting, if the invitation still stands. It is not my intention to be obstructive to meaningful solutions to produce more food for a growing world. Your solutions as stated in the NASAPI document will result in a NET LOSS to Canadians from every perspective. They would remove our rights to access water sources, anchorages and shelter in BC waters and severely degrade environmental protections.

With respect,

Barbara Watson, 350 ton Master Mariner, retired

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