

Why the new Wild Salmon Policy fails to protect wild salmon and the public interest from aquaculture impacts.

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The Coastal Alliance for Aquaculture Reform

The December 2004 “Policy Framework for Conservation of Wild Pacific Salmon”—otherwise known as the Wild Salmon Policy (WSP)—fails to persuade any but the naïve that the federal government is serious about protecting wild salmon and the public interest from impacts of open net-cage salmon aquaculture.

And it fails on so many fronts, even the most casual reader will likely be scornful of government’s blatant disregard for Canada’s citizenry and wild salmon.

The WSP fails by ignoring, dismissing, and/or trivializing the risks posed to wild salmon by open net-cage aquaculture. The WSP fails Canadians and wild salmon by ignoring, dismissing, and/or trivializing the lessons learned by others around the world—and here in BC—on how to measure and manage those risks.

These failures loom large in light of recent and heightened concerns by Canadians over aquaculture impacts—concerns owing mainly to widely reported sea lice infestations and subsequent spawning failures of wild salmon in Canada’s Broughton Archipelago, the area with the greatest density of farmed fish in the entire Pacific Ocean.

These failures are especially blatant given: 1) the weak language of the WSP; 2) the growing weight of evidence of farming impacts; 3) well-documented concerns of the academic and NGO community about federal and provincial aquaculture policy, research and risk-management; 4) aboriginal rights, title and environmental concerns of coastal First Nations; 5) the value Canadians place on Canada’s rich-but-fragile wild salmon legacy; and 6) yet more reports from the federal and provincial auditor generals’ offices critical of governments’ lack of care, leadership and vision.

Failure of Language in the WSP

It's hard to be hopeful about a purported wild salmon policy that devotes just two sentences—and in a sidebar, even—to aquaculture impacts on wild salmon.

The WSP proposes that (page 34):

- Aquaculture operations will be regulated in a manner consistent with other human activities that may adversely affect salmon or their habitat;
- 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 of an integrated planning process.

The language is pithy, tentative, and unbelievably dismissive of both recent concerns and the weight of scientific evidence on this subject. The language suggests it is possible to regulate aquaculture “consistent with other human activities” without acknowledging: what’s been learned about aquaculture risks; that aquaculture may be a more significant risk to the stated objectives of the WSP than most other “human activities”; and that the public has lost faith that governments will honestly admit and to deal with threats in “corrective actions” undertaken “as part of an integrated planning process.”

Failure to Honestly Assess the Weight of Evidence--or Public Concerns

The lack of attention to aquaculture threats in the WSP stands in stark contrast to a growing weight of evidence that aquaculture—particularly with regards to farm-source sea lice impacts on juvenile wild salmon—poses a considerable risk to salmon—worldwide. Much of the weight of evidence exists in recent research from Europe, and many scientific meetings have been held in British Columbia to review the European experience and the evidence from British Columbia. Several seminal papers linking sea lice outbreaks on wild salmon to farm-source lice in BC have also been recently published or accepted for publication.

Most recently, twenty-five scientists—including scientists from DFO, eastern Canada, and Europe— met in BC to examine the evidence. These scientists agreed that salmon farms contribute sea lice to wild fish, that sea lice can kill juvenile fish (even at low infestation levels), and that there was suggestive evidence that sea lice from salmon farms can impact wild salmon on a population level.

The weight of evidence includes: Scottish studies in which densities of lice larvae in waters near farms were correlated to lice production on farms; Scottish, Irish, Norwegian and Canadian studies showing elevated and lethal rates of lice on wild juveniles collected near (but not away from) farms; egg and larvae production models from Europe and Canada showing elevated risks attributable to farm-source lice; following experiments; physiological evidence; and other studies.

Most Canadian and European scientists now agree (as stated in numerous venues) that we must move beyond weight of evidence debates. We must instead measure, reduce, and eliminate aquaculture risks that threaten both wild salmon, and the main principles and objectives of a Canadian wild salmon policy.

Unfortunately, the WSP fails to propose how to do so. The WSP fails to acknowledge that aquaculture risks are taken very seriously by other countries, most of which have far less of a natural legacy left to lose. The WSP fails to consider extensive and standard management actions undertaken by those other salmon farming nations attempting to conserve much diminished wild salmon, actions that include transparent sharing of data on farm-source lice, coordination of farm salmon production and fallowing to reduce lice threats, the establishment and enforcement of biologically-relevant lice “thresholds” on farmed fish, and the establishment of wild salmon (only) reserves, among others.

Failure to Deal With Aboriginal Rights and Environmental Concerns

The majority of coastal First Nations (and most non-coastal ones, too) are opposed to the kind of willy-nilly, myopic, and insensitive approach both governments employ to promote salmon farming.

Farms and hatcheries to supply those farms are typically placed in First Nations territories without adequate (or any) consultation, and this has led to court cases against government and outstanding demands to remove farms (e.g. Homalco, Heiltsuk, Musgamagw Tsawataineuk Tribal Council).

Based on the precedent established in the recent Haida Supreme Court ruling on consultation obligations, the Homalco recently were successful in obtaining an injunction against Marine Harvest from stocking farms in Bute Inlet.

The wild salmon policy thus also fails by ignoring aboriginal rights, title, and environmental concerns around the siting of salmon farms and, as it stands, is certain to prompt future conflicts with First Nations’ wild fish interests.

Failure to Provide Leadership and Vision

Many polls, including those of DFO, show that Canadians prize wild salmon. Canadians, especially British Columbians, have also proven they are concerned about the threats farms pose to the vigor and diversity of Canada’s wild salmon. Three recent reports by the federal, British Columbia and New Brunswick offices of the auditor general have also criticized governments’ lack of vision and leadership on protecting wild salmon and the interests of Canadians.

Unfortunately, the proposed wild salmon policy exacerbates these concerns by entrenching overt and inexcusable government denial and lack of due care. By failing to

openly examine or deal with aquaculture threats—and there are other threats, especially to habitat, not listed here—the policy ignores public concerns, academic peer-reviewed science, and the experiences of others.

And it is exceptionally blatant about all this ignoring, straining our sensibilities even more by suggesting we take a further leap of faith and accept that ‘future’ concerns will be addressed via ill-defined ‘integrated’ planning processes and government-only ‘performance reviews.’

If anything, the current version of the Wild Salmon Policy portrays a government that is apparently uncaring and impervious to peer and performance reviews—at least, around the issue of aquaculture and the protection of wild salmon, and the public interest. Little has changed, it seems, since academic scientists concerned about the collapse of another Canadian legacy—the Atlantic cod—warned that government-administered science in Canada, and its potential for bureaucratic and political interference, merits examination in the wake of recent biological and socioeconomic catastrophes.

The weight of evidence, though not the WSP, suggests that aquaculture—as currently practised—represents a real threat to the biodiversity and fitness of wild salmon—a threat that will only increase as salmon continue to dwindle and sea lice become increasingly resistant to chemical control agents, as has happened elsewhere around the world.

If government is serious about protecting wild salmon and Canadian interests—and promoting employment—it will revise the wild salmon policy to explicitly deal with aquaculture threats, thus ensuring the industry is truly compatible with (not threatening to) wild salmon interests. It will commit resources to the task, not continue to erode DFO’s anemic science budget and mandate. It will admit that current farming practices are heavily subsidized through environmental damage, honestly assess the merits of alternate technologies (such as closed containment), and refrain from promoting industrial development over wild salmon interests until it employs full-cost accounting and transparent risk assessment.

As it stands, the aquaculture protection provisions in the WSP, and DFO’s own recent behavior, are not compatible with most of the proposed principles or objectives (pages 12-16) around open and transparent decisions, maintenance of ecosystem integrity, and conservation of genetic diversity. With no clear commitment to a conservation priority, the whole exercise is little more than an official and unexamined sanctioning of existing government aquaculture policy. Moreover, the introduction of such a “new” process—in which the stated objective is to “balance” social, economic, and social benefits and costs—may only further diminish hopes that the public or wild salmon are being served—unless these weaknesses are corrected in the final wild salmon policy.

This is all particularly sad for those who care about wild salmon and had hoped for much more from a six-years-in-the-making “wild” salmon policy.

Summary of Recommendations

1. The Wild Salmon Policy must explicitly name and deal with the specific threats posed by salmon aquaculture to wild salmon stocks, including the threats from sea lice and disease transfer. The Policy must include mechanisms to implement a policy to protect wild salmon from these threats, including a revamping of salmon aquaculture siting criteria and the CEAA process to take into account issues such as salmon farms as sea lice reservoirs located on wild salmon migration routes. Siting criteria must be based on science, not random guesswork such as the current 1 kilometre buffer from wild salmon streams. Legal mechanisms must be constructed to force public accountability and transparency from the salmon farming industry, such as legal requirements for making sea lice and disease monitoring data, as well as drug and chemical use, fully accessible by the public and independent scientists. A coastwide Salmon Farm Sea Lice Action Plan should be implemented based on biologically relevant lice triggers with clear management actions including enforceable fallowing.
2. Rather than referencing DFO's Aquaculture Policy Framework - which is an enabling document for aquaculture that pledges policy and financial assistance to aquaculture development – the Wild Salmon Policy must set out its own policy framework and set out specific resources to fill the many research gaps pertaining to impacts from salmon aquaculture on wild salmon. Included in this must be a specific pledge for resources to develop alternatives to open net pen aquaculture with its inherent risks to wild salmon stocks.
3. There must be full cost-accounting and transparent risk assessment of the salmon aquaculture industry including an assessment of the externalized environmental costs.
4. The failure to address aboriginal rights must be rectified by naming specific policies regarding consultation and accommodation of First Nations interests in line with recent case law.
5. There must be demonstrable commitment for financial and human resources to deal with salmon aquaculture impacts, rather than a continual erosion of DFO's science budget and a continual downsizing of DFO's habitat monitoring, stock assessment and enforcement capabilities.
6. The Wild Salmon Policy must include sufficient detail of a new direction in monitoring and enforcing the *Fisheries Act* in order to restore public faith in our fish and habitat protection laws and the ability of the Department to use them consistently with prosecutions and penalties that generate respect and compliance.
7. The Wild Salmon Policy must state specifically how the precautionary principle will be applied to salmon aquaculture, given the Department's dismal failure at taking action against very real impacts and threats from salmon aquaculture. The federal Privy Council Framework for the Application of the Precautionary Principle "recognizes that the absence of full scientific certainty shall not be used as a reason for postponing decisions

where there is a risk of serious or irreversible harm.” Yet this principle is not stated in the Wild Salmon Policy and it certainly has not been implemented by the Department in regards to impacts from salmon aquaculture. This principle must be specifically integrated into decision-making and planning processes.

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- 2002. Summit of scientists on sea lice.
- 2000. Summit of scientists: a review of the DFO wild salmon policy.