

Wilderness Tourism Association



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February 19, 2009

Open Letter to Pacific Salmon Forum

Dear Forum Members,

Re: Wilderness Tourism Association response to the Pacific Salmon Forum's Final Report and Recommendations, and statement of serious concerns.

The BC Wilderness Tourism Association (WTA) has prepared this response to the February 5, 2009, release of the long anticipated report and recommendations from the Pacific Salmon Forum. As an industry sector that depends on scarce natural resources, including a resilient wild salmon resource, the PSF Report and recommendations are of extreme importance to us.

The WTA mandate is to ensure a sustainable future for BC's wilderness tourism industry. We represent the hundreds of small businesses that offer nature-based tourism activities throughout British Columbia. Wilderness tourism (or nature based tourism as it is commonly called) is a key contributor to BC's GDP and a significant private sector employer in BC. In 2008, direct tourist expenditures on nature-based tourism products in British Columbia was approximately \$1.5 billion dollars and provided for the equivalent of over 22,000 full time jobs. All BC communities feel the impact of wilderness tourism in their economies. A large percentage of these businesses are small, localized businesses that provide stability, diversification and job creation, whether it's in the wilderness, in or near municipalities, or on First Nations settlement lands.

In order to become more informed about this important and highly polarized issue the WTA and our industry stakeholders have reviewed the available science (both published and unpublished) regarding the issues and concerns of salmon farming and implications to the wild fishery and the marine environments. We have also visited farm sites, consulted industry experts and scientists both in BC and Norway, and attended Pacific Salmon Forum meetings.

Generally, the PSF report was received positively by the WTA. We are pleased that the report acknowledges the magnitude of the problems created by open net cage salmon farms on the BC coast, and recommends sweeping reforms in aquaculture management practices, the collection and distribution of information, and research into aquaculture's impacts on wild salmon and ecosystems, especially the requirement to sample fry for sea lice in all areas of BC where there are salmon farms.

We strongly support the formation of independent watershed groups composed of watershed users and NGOs who report to an independent coastal governance authority. The coastal authority should be empowered to regulate, audit, and enforce the regulations and report to the public. The coastal authority should also adopt a coordinated management approach in all salmon farming areas, set thresholds on factors affecting the wild salmon and make all

“Ensuring a sustainable future for BC's wilderness tourism industry through leadership, advocacy, and education.”

information available to the public. We believe the PSF's recommendations 5 and 12 can be combined to accomplish this. We also support the establishment of an independent science secretariat reporting to the coastal authority consistent with recommendation 13.

While we welcome many of the Forum's recommendations, the WTA notes some serious concerns with the report. Our most serious concern is with recommendation 8 on page 12 of the PSF report and we quote:

“Based on interim research results in the Broughton, the Forum has reached the following conclusions:

»» No more than 3% of juvenile wild pink and chum salmon of less than 0.5 grams should have more than one pre-adult or later stage L. salmonis between March 1 and May 31, based on the estimated natural background of lice in the Broughton”

We interpret this recommendation to mean that it is okay to have one or more lice on a fry (*juvenile wild pink and chum salmon*) weighing less than 0.5g as long as the lice is not motile (“*pre-adult or later stage L. salmonis*” that is able to move on the fry). We understand that non-motile lice may not be as harmful as motile lice, but they mature into motile lice and kill the fry. We also cannot accept that fry weighing more than 0.5 g are not susceptible to death from sea lice that are motile. We understand there is peer reviewed research to show that fry with motile lice have their swimming ability damaged and are more susceptible to predators and die. We also understand that the European experience shows that much larger smolts (several grams) of Atlantic salmon and sea trout are infected and die from sea lice transmitted from open net caged farms.

We urge that PSF to review recommendation 8 and restate it to read:

“All juvenile wild salmon (fry) in and around salmon farms should have no more than the estimated natural background lice counts during the out migration of the fry”. This applies to both motile and/or non-motile lice, which is presently understood to be between 3% and 5% in the Broughton Archipelago.

In addition, an action plan is necessary to address incidents where the estimated natural background lice levels on the fry are exceeded. If these levels are exceeded farms should be fined commensurate with the death of fry attributed to their lice and they should be required to take aggressive action, such as fallowing the farm for the next out migration. Fines collected should go toward habitat restoration projects in the watershed affected.

We believe that the recommendation as presently worded, sets the bar for sea lice on wild salmon fry so high that most of these fry will die.

We are concerned about the continued use of SLICE™ (Emamectin Benzoate) to control lice populations on farm fish and its effect on other marine life and the food chain (recommendation 11). We do however, look forward to seeing the results of the PSF research into the use of SLICE as well as non-drug treatments for on-farm disease and parasite management.

Finally, the WTA supports recommendation 16, which recommends that the Provincial government fund a commercial scale closed containment project. However, the WTA is troubled by the formulation of the recommendation. In the WTA's view, it is problematic to try and achieve a single “complete closed containment” system (i.e. land based). This restricted view of technological innovation risks derailing a range of commercial trials. As an example the federal

government and private foundations are currently funding the development of a commercial scale closed containment pilot at Middle Bay in Campbell River, which utilizes a deep, salt water intake that does not filter the water, but the location of the source of rearing water may avoid some pathogens including sea lice. The solid wall technology addresses many of the other issues including escapes, interaction with marine mammals and collection and management of a significant portion of farm waste.

Overall, the WTA commends the PSF for acknowledging the many serious issues surrounding open net-cage salmon farms on the BC coast. The WTA strongly encourages the BC and Canadian governments to take the PSF report seriously and act quickly to implement the report's key findings. The WTA has worked for several years to bring this important issue to the attention of both levels of government in order to prevent a catastrophic decline in wild salmon and the corresponding havoc wreaked on nature-based tourism. Action to rectify this situation is critical now; time is running out for important runs of BC's wild salmon.

Respectfully,



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