



Pacific Coast
Wild Salmon
Society



March 4, 2022

Ms. Rebecca Reid
Regional Director General
Department of Fisheries, Oceans and the Canadian Coast Guard
Suite 200, 401 Burrard Street
Vancouver, British Columbia V6C 3S4

Dear Ms. Reid,

Re: 2022 Marine Finfish Aquaculture Licences and Conditions of Licence

We understand that you will be making the final decision on the re-issuance of expiring marine finfish aquaculture licences and their associated Conditions of Licence within the next few weeks. We note that two of our key recommendations have not been taken up in the package of changes to the CoL that staff have prepared; namely, that licence terms should be restricted to one year and that the time allowed to return sea lice levels below threshold should be shortened.

Having just met with Aquaculture Management Division staff, we have learned that staff have no conservation concerns that would merit any substantive change to the Conditions of Licence, in particular as regards the impacts of sea lice, *Tenacibaculum maritimum* and *Piscine orthoreovirus* on wild juvenile salmon, despite the large and growing body of evidence that these parasites and pathogens do indeed threaten wild salmon survival.

AMD staff shared that they have been unable to date to obtain a rapid science response on the issues surrounding sea lice management and have no firm conclusions as to how they and the Science Branch will deal with the new evidence on *Tenacibaculum* and PRV that renders the CSAS risk assessments for those pathogens obsolete and raises significant conservation concerns.

Scientists in the employ of your own Department, together with others from UBC and the Pacific Salmon Foundation have expressed in unequivocal terms the strength of the body of evidence linking farm-origin pathogens with poor salmon returns. Simon Jones co-authored a paper published in 2018 confirming that sea lice infestation has far more profound effects on sockeye salmon than on farmed Atlantic salmon.

AMD staff explained at length how they and the Science Branch convene to weigh the evidence of conservation risk on an ad hoc basis; and how ongoing consultation with habitat and stock assessment personnel allows for communication and evaluation of risks to wild salmon. However, they could not provide evidence that this process is underway despite severely depressed wild salmon returns to regions such as Clayoquot, Nootka and Quatsino Sounds, areas with a recent history of sea lice control failure.

The Minister has clearly recognized the risk open net-pens pose to wild salmon and the dire state of wild salmon stocks which is why she has committed to phasing out these farms and any license durations over 1 year would undermine that.

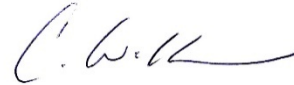
On the subject of sea lice management, we can advise that one of the 2020 Conditions of Licence that the AMD advises continuing in the 2022 CoL, that all lice be removed from treatment water before it is discharged to the marine environment, is routinely breached by industry. Staff explained that they have not sampled the treatment vessels' effluent because 'we would have no way of distinguishing lice from the treatment vessel from lice occurring naturally'. If that is the case, please ensure that Compliance and Monitoring staff are provided with the attached methodology—chalimus-stage lice in the samples is a reliable indication that the sample includes lice that have escaped the treatment vessel's filters.

In closing, we attach a copy of our letter of May 31, 2021, in which we provided our submissions on the changes required to protect wild salmon. Clearly, nothing contained therein has 'landed' in the recommendations for new licences. While we understand that licences can be amended at any time for conservation concerns, it is entirely unclear what would trigger those concerns if not published, peer-reviewed science, the strongest possible recommendations from the scientists involved in the research and the collapse of wild salmon stocks exposed to salmon farms.

Yours truly,



Karen Wristen
Executive Director,
Living Oceans Society



Christianne Wilhelmson
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