



**March 7, 2015**

**Re: Goat Cove farm expansion**

Dear Diana Trager,

I write on behalf of Watershed Watch Salmon Society, the Pacific Salmon Foundation, David Suzuki Foundation, Pacific Coast Wild Salmon Society and Living Oceans Society. We recently learned of the proposal to expand production at the Goat Cove open net salmon farm near Roderick Island. The proposal is to increase the allowable production at this farm from 2815 metric tonnes to 4000—an increase of 1185 tonnes. This proposal, coupled with two applications for ‘replacement’ sites in the area will mean a 29 percent increase over current licenced production of farmed Atlantic salmon in the Central Coast of BC.

We are opposed to this expansion at Goat Cove for three primary reasons.

1. Expansions at Goat Cove (and elsewhere) should not happen until Cohen Commission Recommendations are implemented. This federal government committed to implementing the Cohen Commission recommendations in the mandate letter to Minister Hunter Tootoo. Recommendations 15, 16 and 17 are of particular importance and deal with the development of new science-based salmon farm siting criteria. The March 31, 2013 deadline for the development of these criteria is long overdue.
2. Our observations point to a potential problem in managing sea lice on salmon farms in the Central Coast area, which could put local out-migrating wild juvenile salmon at risk. In February 2015, Goat Cove had an average of 10.3 motiles right before the outmigration period, at which point harvesting started and sea lice levels were not reported any further. Three other farms in the region (including Kid Bay) had average sea lice levels far above the allowable value of 3 motile sea lice per farm fish during the wild juvenile salmon outmigration period, despite the use of two treatments—SLICE (emamectin benzoate) and Paramove 50 (H<sub>2</sub>O<sub>2</sub>) in 2015. Paramove 50 is a relatively new industry treatment method in BC and was experimented with in 2014 at Kid Bay—adjacent to Goat Cove. We recently learned through the Access To Information Process (see attached, page 3), that DFO has evidence of the development of resistance in sea lice to SLICE. We surmise this is the reason for Paramove 50 experimentation. If resistance is developing in sea lice to SLICE, this could have grave implications for BC’s wild salmon. Expansions at this time will put wild salmon at more risk.

3. Given past research from the Broughton Archipelago that suggests sea lice from farms can impact wild fish, and the confirmation that DFO is not monitoring juvenile wild salmon in proximity to farms on the Central Coast, we are concerned additional density in this area will compound the risk.

We are also concerned about the growing lack of transparency in DFO with respect to the open net salmon farming industry. A couple examples include:

- a. This proposed expansion in production at Goat Cove is not publicly posted on the DFO or any Provincial government website. British Columbians deserve to know about proposed industrial changes in their waterways and they should have a balanced mechanism to provide input and participate in an objective assessment of such expansion proposals. Just a few years ago, this type of significant expansion in farmed Atlantic salmon biomass would likely have gone through an Environmental Assessment; but in 2016, the details are not even publicly posted. We were startled to first learn of the Goat Cove expansion through a conversation with DFO staff. This is surprising given this federal government's recent mandate letter to Fisheries Minister Hunter Tootoo which included a commitment, "to set a higher bar for openness and transparency in government."
- b. We met with aquaculture management and science staff as recently as December 2015 specifically on the topic of sea lice management. DFO staff never brought forward their findings of sea lice developing resistance to SLICE or the possibility that new Conditions of Licence to assess that possibility were being contemplated for marine finfish facilities in BC. Sadly, we had to learn of this through ATIPs.

For these reasons we oppose an expansion at Goat Cove farm and the new applications at Alexander Inlet and Cougar Bay in the Central Coast region.

Sincerely,

Stan Proboszcz,



Science Advisor, Watershed Watch Salmon Society

Cc

Rebecca Reid, Regional Director

Terry Tebb, Pacific Salmon Foundation

John Werring, David Suzuki Foundation

Alex Morton, Pacific Coast Wild Salmon Society

Karen Wristen, Living Oceans Society