



Pacific Fisheries Resource Conservation Council  
Conseil pour la conservation des ressources halieutiques du pacifique

10 March 2004

The Honourable Geoff Regan  
Minister of Fisheries and Oceans  
200 Kent Street  
Ottawa, Ontario K1A 0E6

Dear Minister Regan:

**Re: Commissioner Bastien's "Recommendations for Change"  
Report on Aquaculture**

As your ministerial advisory group on issues related to salmon and steelhead, the Pacific Fisheries Resource Conservation Council has provided considerable information and advice on the subject of aquaculture during the past two years.

One of the conclusions I've personally reached from this is that in British Columbia full scrutiny needs to be given to any substantive decision regarding aquaculture. The timeframe for response to Mr. Bastien's "Recommendations for Change" report have been unnecessarily short and has not allowed our Council the time to formulate substantive advice on the recommendations in so far as they might impact the conservation of wild Pacific salmon. I expect the same situation applies to other interested parties. I would recommend that you extend the time period that you allow for input. I would also recommend that you consider the potential benefits of the "Salmon Aquaculture Forum" as a mechanism to bring interested parties together and, to the degree possible, reach consensus on the appropriate recommendations before you make your decision.

Regarding the justification of expanded salmon aquaculture, Mr. Bastien's "Achieving the Vision" report justifies aquaculture partly on the basis of depressed wild stocks. At one point the report states, "reduction of the Pacific salmon and Atlantic groundfish stocks" suggesting a conclusion that the wild salmon stocks are in trouble. This is inconsistent with the facts. While it is true that some stocks, notably Cultus and Sackinaw sockeye and interior coho, are endangered, this is not the general situation. The Pacific salmon resource is abundant and diverse, comprising five species (six if you count steelhead), hundreds of stocks and millions of fish. Accordingly, the Council takes the view, and I hope you do too, that wild salmon must come first.

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Aquaculture development should not be at the expense of wild salmon. I would consider very cautiously the proposed recommendation to weaken the habitat protection provisions of the *Fisheries Act*. Thousands of development projects in or near water get approved and proceed each year despite review and modification to satisfy the requirements of the *Fisheries Act* and DFO's "no net loss" working principle. I see no reason to allow for an aquaculture proponent to receive an exemption from a review under Section 35 of the *Fisheries Act* simply because a "Code of Practice" is followed. Site specific conditions and other factors are just as important to assess, as is now done. The *Fisheries Act* is a law specifically aimed at protecting wild salmon and neither aquaculture nor other types of works or undertakings should be exempt from its scrutiny.

Thank you for your consideration of these preliminary observations.

Sincerely,

John A. Fraser  
Chair

cc: PFRCCouncil