

September 16, 2011

Susan Farlinger
Director General – Pacific Region
Fisheries and Oceans Canada
Susan.Farlinger@dfo-mpo.gc.ca

Re: UFAWU Ocean Ranching Proposal to PSC Northern Fund

Dear Sue Farlinger,

It has come to the Marine Conservation Caucus's (MCC) attention that the UFAWU has put forward a proposal to the PSC Northern Fund to initiate Ocean Ranching on the North and Central Coast of BC. If accepted, this proposal could instigate a major shift in Federal fisheries policy, and put the objectives of the Federal Wild Salmon Policy at risk.

As previously expressed, Ocean Ranching brings significant risks to wild pacific salmon, which include:

- Interbreeding with wild salmon, interfering with natural selection and lowering genetic integrity, diversity, and fitness of the wild populations;
- The replacement of wild salmon, with no net increase in production;
- The introduction of a potential disease vector to wild salmon;
- Additional mixed-stock fishing pressure affecting weak and non-target wild stocks;
- Competition with wild salmon for a limited food supply in the marine environment;
- Reduced ability to assess the status of wild salmon;
- Increased demands on DFO's resources to effectively manage fisheries.

Over the last few years studies and investigations into the effects of ocean ranching on wild salmon in Alaska have confirmed these impacts. Brenner & Moffitt (ADF&G) found that hatchery salmon made up a large portion of total adult returns to historically important wild-salmon spawning rivers in Prince William Sound (0–98% for pink salmon, 0–63% for chum salmon and 0–33% for sockeye salmon). The authors conclude that “minimizing the homogenizing effects of hatcheries on genetic diversity and protection of weak stocks from overharvesting in mixed stock fisheries will be required to maintain the diversity that stabilizes variance in returns,” a view that seems consistent with the primary objective in Canada's Wild Salmon Policy: “Safeguard the genetic diversity of wild Pacific salmon”. Similar straying rates were also found for chum salmon in southeast Alaska by Piston & Heintz (ADF&G), who concluded that the majority of wild salmon spawning streams studied within 50km of release sites contained > 50% hatchery fish. In addition to the above concerns, both studies highlight that estimates of wild escapements into these systems are being seriously biased by high straying rates.

The belief that Ocean Ranching increases production has also been called into question. In 2010, Dr. Ray Hilborn presented information to the State of the Salmon Conference in Portland, Oregon, which showed production from Ocean Ranching has not increased the overall production (wild + hatchery) of salmon in Prince William Sound, and that ocean ranching production has simply replaced wild production.

Ocean ranching facilities will also likely increase competition for limited food in the near shore marine environment. As you are aware, many North & Central Coast chum stocks have been in serious decline in recent years. DFO's North Coast stock assessment staff believe the primary driver of these declines is due to a decrease in near shore marine productivity rates limiting food availability for smolts. Large-scale smolt production would exacerbate this problem – putting the rebuilding of depressed wild populations at even greater risk.

In light of these risks, understanding the potential impacts from the introduction of Ocean Ranching on Canada's West Coast is essential to protect the genetic integrity and abundance of wild Pacific salmon. As you and your staff informed MCC members during our May 24, 2011 meeting, any Ocean Ranching proposal would need to be run through the WSP SEP Risk Assessment Tool (under development). The UFAWU's proposal is at best premature until the above risks can be fully assessed, the Risk Assessment Tool has been peer reviewed, and all existing enhancement facilities in the province have been assessed. Further, DFO is facing additional cutbacks, and the introduction of new enhancement facilities and their resulting fisheries would require additional management resources the department does not have. Any divergence of existing resources, including staff time to facilitate this proposal, would be irresponsible.

Ocean Ranching would also require a major shift in government policy, and there should be extensive consultation with all affected stakeholders and the Canadian public prior to the consideration of any Ocean Ranching proposal in British Columbia. A poll conducted in April 2011 by Angus Reid Public Opinion showed nearly half of British Columbians (47% +/- 3.5%) view hatcheries as a threat to wild salmon populations.

The MCC hopes that the department and the PSC Northern Panel Proposal Selection Committee will take these concerns into consideration. We also request that you inform us of the department's position on the UFAWU's Ocean Ranching proposal in relation to the concerns and process issues we have outlined above.

Sincerely,

A handwritten signature in black ink that reads "Craig Orr". The signature is written in a cursive, slightly slanted style.

Craig Orr
MCC Chair and Executive Director, Watershed Watch Salmon Society
on behalf of the MCC Salmon Committee

The MCC Salmon Committee includes representatives from Watershed Watch Salmon Society, SkeenaWild Conservation Trust, Raincoast Conservation Foundation, Pacific Streamkeepers Federation, David Suzuki Foundation, and Steelhead Society of BC

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