

OUR SOUND, OUR SALMON

September 24, 2020

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To the Honorable Prime Minister Trudeau, the Honorable Premier Horgan, and the Honorable Minister Jordan:

On behalf of the undersigned members of *Our Sound, Our Salmon* and our partner organizations, we are writing to you today to express our solidarity with the First Nations Leadership Council's call for an immediate end to open net-pen salmon farming in the waters of British Columbia. We fully support their request and respectfully ask you to fulfill your promise of a collaborative, cooperative transition to closed-containment aquaculture for the benefit of wild salmon, endangered orcas, the First Nations of Canada, and our shared Salish Sea.

We see this action as critical to addressing the alarming decline and collapse of Fraser River salmon stocks, for which our nations share a responsibility to restore and protect. Between 1980 and 2014, returns of adult Fraser River sockeye averaged 9.6 million; this month the Pacific Salmon Commission predicted that only 283,000 adults may return this year— the lowest return ever recorded. Fraser River Chinook and coho are also depressed, and steelhead are teetering on extinction. In response to this dire situation, First Nations throughout B.C. continue to lead the call for a moratorium on all fishing within the Fraser River, an immense sacrifice of their livelihoods, food security, and cultural heritage. While not the sole limiting factor, open net-pen salmon farms are a major contributor to the decline of Fraser River salmon, and therefore transitioning this industry to land-based facilities is fundamental to reversing this decline.

The risks open net-pen salmon farms present to wild Pacific salmon are well-documented and manifest everywhere in the world where these facilities exist. These risks include rampant levels of untreated and unmitigated daily pollution; the amplification and spread of both endemic and exotic viruses, parasites, and diseases to wild fish populations; and both chronic and large-scale

escape events in which farmed salmon endanger their wild counterparts through competition, genetic introgression, escapee-recovery efforts, and further amplification and spread of harmful pathogens by escaped fish. In 2018, Washington State passed a landmark law banning all open Atlantic salmon net-pens on the grounds that they pose an unacceptable risk to wild salmon, the orcas that depend on them, and the greater health of Puget Sound and the Salish Sea.

As noted by the FNLC in their June press release, the owners of B.C.'s open net-pen operations themselves reported that during a coastwide sea lice outbreak this summer, 37% of farms across all regions exceeded government-mandated sea lice limits put in place to protect wild salmon. The only area where sea lice infection rates did not exceed that limit was the Broughton Archipelago, where five farms have recently been removed at the request of local First Nations. Sampling by independent biologists discovered juvenile salmon throughout the coast that migrated near these open net-pen farms were infected with potentially lethal levels of sea lice, amplified and spread by these infected facilities. These outbreaks lasted several months, and were most severe in the Discovery Islands, where 94% of all juvenile Pacific salmon tested were found to be infected with sea lice. The inability of the industry to meet even the minimum requirements set by the Canadian government in a timely manner despite their best efforts is a clear indicator that open net-pen salmon farms and wild salmon recovery cannot coexist, particularly in the Discovery Islands.

The Cohen Commission, which published its landmark study on how to reverse the decline of Fraser River salmon in 2012, recommended the Minister of Fisheries remove the open net-pen farms in the Discovery Islands by September 30, 2020, unless "such farms pose at most a minimal risk of serious harm to the health of migrating Fraser River sockeye salmon." The Department of Fisheries and Oceans (DFO) has yet to take action to fulfil this recommendation, despite – as noted by the FNLC – DFO's own reports clearly showing the negative impacts to Fraser River salmon. We support the FNLC's greater call for the removal of all salmon farms from British Columbia's marine environment, starting with the removal of the Discovery Island open net-pen salmon farms. This action is critical to wild salmon recovery and the health of the Salish Sea and its marine wildlife, especially orcas.

Both the Northern and Southern Resident orca communities are listed under the Species At Risk Act (SARA); the Southern Resident community, the most transboundary population of Resident orcas, is also listed under the U.S. Endangered Species Act (ESA). These two populations are fish-eating communities of orcas and are uniquely dependent on salmon that migrate through British Columbia waters to return to rivers in both the U.S. and Canada. A lack of available prey is noted by both the U.S. and Canada as a significant threat to both the Northern and Southern Residents, and is widely recognized as the primary factor contributing to the continued decline of the Southern Resident community. Without adequate food, the Southern Resident orcas are struggling to give birth to healthy calves, have reduced growth rates and adult lengths, and poor body condition has been noted in multiple members of the population.

Resident orcas have incredibly strong family bonds, living in family groups led by elder females, with both male and female offspring staying with their mother for her entire life. A lack of food is leading to changes in the social cohesion of the Southern Resident orcas, forcing them to spend more time apart to forage in different areas, and to changes in their habitat use. As the number of salmon returning to the Fraser River has declined, the Southern Resident community is spending less time in their historic summer home of the Salish Sea. In the past, all three pods (J, K, and L) were regularly seen in the Salish Sea during the summer, giving the entire population an opportunity to engage in social behaviors such as the famous “superpod” greeting ceremonies. However, without enough food available in the Salish Sea, the Southern Residents are looking for salmon elsewhere, an alarming change in behavior and habitat use that may have long-term effects on the survival and the unique culture of this community.

To protect Northern and Southern Resident orcas and their unique cultures, we must protect and recover the salmon these populations depend on. The recent announcement of a newly born calf and several additional pregnant females in this struggling group of orcas is welcome and encouraging news, but greatly increases the urgency to ensure these new and expectant mothers have the resources they need to carry these calves to term, give birth to healthy babies, and support these young, dependent orcas – especially an abundant and available supply of salmon.

The coastwide removal of dangerous open-net salmon farms is critical for the health and recovery of the Northwest’s wild Pacific salmon and killer whale populations. We stand firmly in solidarity with the FNLC in supporting their request for the removal of all salmon farms from B.C. waters. Last year, the Canadian government committed to remove all salmon farms from the Broughton Archipelago at the request of the local First Nations. We urge you to continue this reconciliation and honor the FNLC in their call for a similar agreement to remove facilities that are operating in their traditional waters without their consent.

We recognize salmon are fundamental to the cultures and economies of First Nations throughout British Columbia, and both salmon and orcas are deeply intertwined with the heritage of this region. Open net-pen salmon farms are contributing to the decline of wild Pacific salmon and the First Nations’ ways of life.

To protect salmon, orcas, and to respect the rights of First Nations, we urge you to answer the FNLC’s call to action and bring an immediate end to all open-net salmon farms in British Columbia.

Regards,

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Our Sound, Our Salmon is a coalition of U.S. organizations, businesses, and individuals working collectively to protect wild salmon and orcas from the impacts of commercial net pen aquaculture