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February 8, 2018

File No.: 0230-20

Association of Vancouver Island and Coastal Communities  
525 Government Street  
Victoria, BC V8V 0A8

Dear Liz Cookson,

**Re: 2018 Resolution -- Request for DFO review of Integrated Geoduck Management Framework**

Please be advised that on February 7, 2018 the Islands Trust Executive Committee passed the following resolution for the 2018 AVICC Annual General Meeting:

That the Executive Committee directs staff to finalize and forward a resolution with backgrounder for consideration at the 2018 Association of Vancouver Island and Coastal Communities and Union of BC Municipalities conventions requesting DFO to conduct an ecosystem-based study of potential and cumulative impacts of increased geoduck clam aquaculture and consider increased monitoring and enforcement.

Please find attached the background information regarding this resolution.

I trust the above is satisfactory, and please do not hesitate to contact me if you require further information.

Yours truly,

Carmen Thiel  
Corporate Secretary

Attach: Resolution and Backgrounder



## **Request for DFO review of potential cumulative impacts of increased geoduck aquaculture**

WHEREAS Fisheries and Oceans Canada (DFO) approved the Integrated Geoduck Management Framework in 2017 (IGMF);

AND WHEREAS the IGMF will lead to increased applications for geoduck aquaculture which has the potential to negatively impact the marine environment;

THEREFORE BE IT RESOLVED that UBCM request that DFO conduct an ecosystem-based study of potential and cumulative impacts of increased geoduck clam aquaculture and consider increased monitoring and enforcement.

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### **Backgrounder**

Fisheries and Oceans Canada (DFO) approved the Integrated Geoduck Management Framework 2017 based on research limited to the impact of geoduck clam aquaculture on the wild geoduck clam fishery. This approval ended a moratorium on geoduck aquaculture, which will lead to increased applications for geoduck aquaculture.

DFO has advised that applications will be assessed on a license-by-licence basis. There are concerns that DFO will not sufficiently consider the potential and cumulative impacts of increased geoduck clam aquaculture in the Salish Sea.

A November 2017 Islands Trust staff review of the available science did not result in an impression that there is scientific consensus that the potential impacts of intensive geoduck aquaculture, particularly in the intertidal zone, are certain to be minimal. Staff noted that many articles conclude with calls for additional research. The Islands Trust staff report on this topic is available on request.

Therefore, a DFO ecosystem-based study of potential and cumulative impacts of increased geoduck clam aquaculture review is required to adequately understand potential ecosystem and cumulative impacts of any new geoduck clam aquaculture licences. Among other topics, this study could address the impacts of:

- seeding and liquefaction processes on the ocean floor and intertidal beaches;
- predator/canopy netting and PVC pipes on marine life and microplastic levels; and
- introduction of new aquaculture on carrying capacity.

In addition, existing shellfish aquaculture operations are contributing to regional garbage and environmental issues due to insufficient attention to abandoned gear. Increased enforcement of existing licences is required.