



Islands Trust

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File Number: 5450-30

via e-mail: min@dfp-mpo.gc.ca

The Honourable Dominic LeBlanc, MP
Minister of Fisheries and Oceans Canada
200 Kent Street, Station 15N100
Ottawa ON K1A 0E6

Dear Minister LeBlanc:

Re: Request for ecosystem-based study of potential impacts of the Integrated Geoduck Management Framework 2017 on the health of the Salish Sea

On behalf of the Islands Trust Council I am writing to request that Fisheries and Oceans Canada undertake, as a priority, an ecosystem-based study of potential and cumulative impacts of the Integrated Geoduck Management Framework 2017 on the health of the Salish Sea.

There are concerns in our island communities that DFO did not sufficiently consider ecosystem and cumulative impacts before approving the 2017 Integrated Geoduck Management Framework. It is my understanding that when creating the Framework, DFO chose to focus analysis of geoduck aquaculture impacts to “conservation and long-term sustainability of wild geoduck stocks” rather than impacts to the broader environment. No mention is made in the Framework of protection of the marine environment, fish habitat, biodiversity or human health. DFO staff advises that broader ecological impacts will be assessed at the licence application level. This raises concern for us and community members that assessment at the individual licence level will result in insufficient consideration of cumulative impacts regionally, and at the ecosystem level.

Concerns about the adequacy of the science that informs geoduck aquaculture regulations are not new. In 2007, the BC Legislature’s Special Committee on Sustainable Aquaculture [recommended](#) that: “No new species are to be approved for commercial aquaculture without a consensus of independent peer-reviewed science demonstrating that the potential impact on the marine environment is minimal”. (7.5)

Islands Trust staff has reviewed the available research and did not get an impression that there is yet scientific consensus about the potential impacts of intensive geoduck aquaculture in the Salish Sea. Staff noted that many articles conclude with calls for additional research. It seems prudent for DFO to study and understand the potential and cumulative impacts of future geoduck clam aquaculture installations.

The Framework states that the objective of supporting economically, environmentally and socially sustainable wild and aquaculture fisheries will support the integrated management of wild and aquaculture fisheries for geoduck. With this in mind, we respectfully suggest that the study give particular consideration to the potential impacts from the geoduck clam aquaculture industry on the subtidal, intertidal and foreshore ecosystems that are vital herring spawning areas as well as herring and other forage fish habitats.

We are pleased that DFO has already begun investigating the impacts of aquaculture in coastal BC by funding a study of microplastics and shellfish aquaculture. Geoduck clam aquaculture, as most shellfish aquaculture is presently practiced, includes extensive use of plastic gear. This project will be a useful contribution to any ecosystem-based study on potential and cumulative impacts of geoduck clam aquaculture.

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Preserving *Island* communities, culture and environment

Bowen Denman Hornby Gabriola Galiano Gambier Lasqueti Mayne North Pender Salt Spring Saturna South Pender Thetis

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Thirty-four First Nations have asserted rights and title in the Salish Sea, and Islands Trust Area – ten of these are Douglas Treaty Nations with established fishing and harvesting rights. A number of the First Nations have an interest in the wild geoduck clam fishery; some in geoduck aquaculture; and some have interests in both wild and aquaculture geoduck clams. These First Nations may expect to see their Traditional Ecological Knowledge incorporated into the study we are requesting. Although we copy First Nations on all correspondence such as this, we are not knowledgeable about their positions on the introduction of geoduck aquaculture into the Islands Trust Area. Given our commitment to reconciliation with First Nations, we offer the Islands Trust position while being ready to respectfully consider their positions, as they become known.

Thank you for considering this request. The Islands Trust Council is a federation of local government bodies representing 25,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The Islands Trust Area includes the ocean between the British Columbia mainland and southern Vancouver Island, including areas of vital orca habitat, vibrant aquaculture and wild fisheries, as well as vital herring and other forage fish spawning areas.

Yours sincerely,



Peter Luckham

Chair, Islands Trust Council

pluckham@islandstrust.bc.ca

pc: Cowichan Tribes
Esquimalt First Nation
Halalt First Nation
Homalco First Nation
Hul'qumi'num Treaty Group
K'omoks First Nation
Klahoose First Nation
Laich-kwil-tach Treaty Society
Lake Cowichan First Nation
Lyackson First Nation
Malahat Nation
Musqueam First Nation
Nanwakolas Council
Pauquachin First Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
Semiahmoo First Nation
Shishálh (Sechelt) First Nation
Snaw-naw-as (Nanoose) First Nation
Snuneymuxw (Nanaimo) First Nation
Songhees First Nation
Squamish First Nation
Stz'uminus (Chemainus) First Nation
Te'mexw Treaty Association
Tla'amin (Sliammon) First Nation
T'Sou-ke (Sooke) First Nation
Tsartlip First Nation
Tsawout First Nation
Tsawwassen First Nation
Tseil-Waututh (Burrard Inlet) First Nation
Tseycum First Nation
We Wai Kai (Cape Mudge First Nation)
Wei Wai Kum (Campbell River First Nation)
Aboriginal Aquaculture Association
BC Shellfish Growers Association
Underwater Harvesters Association
Association for Denman Island Marine Stewards
Bowen Island Municipal Council
San Juan County
Comox Valley Regional District
Islands Trust Council
Islands Trust website