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December 9, 2019

File Number: 400-20; 5020-30

via e-mail: Min@dfo-mpo.gc.ca

The Honourable Bernadette Jordan
Minister of Fisheries and Oceans, and the Canadian Coast Guard
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Jordan:

Re: Request for additional resources for enforcement of shellfish aquaculture regulations

I am writing on behalf of the Islands Trust Council regarding long-standing concerns relating to shellfish aquaculture in Baynes Sound, British Columbia. We would like to request that Fisheries and Oceans Canada dedicate more resources to enforcement of aquaculture regulations with the aim of reducing the amount of aquaculture refuse in the marine environment. We would also like increased enforcement regarding the requirements to mark tenure boundaries clearly. This will help ensure that Denman Island beaches and near shore waters are safe for all users and wildlife.

The Islands Trust, created through the provincial *Islands Trust Act*, is a federation of special-purpose local government bodies representing 26,000 people living within the Islands Trust Area and approximately 10,000 non-resident property owners. The Islands Trust Area is located within Coast Salish territory and is home to over 28,000 Coast Salish Peoples who have called this place home since time immemorial. The Islands Trust mandate is to preserve and protect the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with First Nations and other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5,200 square kilometres. It is Trust Council's policy that aquaculture is a valuable activity in the Trust Area if compatible with maintenance of ecosystems and community character.

Islands Trust appreciates Department of Fisheries and Oceans Canada's (DFO) participation in collaborative initiatives aimed at reducing aquaculture industry marine debris. We understand that for the past three years, DFO has funded clean-up efforts and removed approximately 45 tonnes of shellfish aquaculture debris and old broken gear from the Baynes Sound area. We also appreciate DFO's efforts to provide funding to phase out Styrofoam floats via the Fisheries and Aquaculture Clean Technology Adoption Program.

The 14th annual Denman Island Community Beach Clean-up was held during the week of September 15-22, 2019. The clean-up was organized by the Association for Denman Island Marine Stewards (ADIMS), and was joined by the DFO, and the BC Shellfish Growers Association. ADMIS estimates the debris yield on Denman Island alone for 2018, was over six tons with ninety percent (90%) of the plastic debris originating from the shellfish aquaculture industry. Items included oyster trays, anti-predator netting, plastic fencing, plastic net bags, plastic floats, Styrofoam floats for rafts, and thousands of pieces of rope.

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Baynes Sound, in the Strait of Georgia, between Denman Island and Vancouver Island, is a particularly important and sensitive ecosystem. Following a scientific process, in 2012 DFO designated the Sound as an Ecologically and Biologically Significant Area. The Sound is home to sea mammals, globally important duck and bird populations, and unmatched biological diversity.

We are asking for your leadership, as the federal government is responsible for regulating the shellfish aquaculture industry in British Columbia, including monitoring the potential impacts on the marine environment. The conditions of licence issued to all shellfish growing tenures state:

The licence holder shall not introduce or cause or allow the introduction of aquaculture refuse (including but not limited to infrastructure, equipment and materials) into the environment in the course of conducting aquaculture activities.

Despite this requirement, a lack of enforcement is resulting in poorly-secured gear and equipment – mostly plastic – continuing to wash up onto Denman Island shores and contaminating the surrounding marine ecosystem. The Denman Island Local Trust Committee, a locally-elected body within Islands Trust, regularly receives complaints regarding marine plastic debris and ghost netting washing up on Denman Island shores. In 2017, the DFO published its Shellfish Aquaculture Debris Strategy and Action Plan which stated that between 2010 to 2015, inspections revealed that “over 50% of licenced sites in B.C. have derelict or unmaintained gear and infrastructure, as well as improperly wrapped or exposed Styrofoam”. More resources for the Baynes Sound region is justified as the Sound is a shellfish aquaculture hotspot that produces half of British Columbia’s commercially grown oysters and clams.

The Islands Trust appreciates the efforts DFO has made in recent years to work with industry to reduce aquaculture marine debris but believes that more resources need to be allocated to enforcement, to increase the numbers of inspections, and enforce existing licence requirements.

Thank you for considering this matter.

Yours sincerely,



Peter Luckham
Chair, Islands Trust Council
pluckham@islandstrust.bc.ca

cc: Islands Trust Area MPs
BC Minister of Forest Lands and Natural Resource
Operations and Rural Development
BC Parliamentary Secretary for Environment
BOKÉĆEN (Pauquachin) First Nation
Cowichan Tribes
Halalt First Nation
Homalco First Nation
Klahoose First Nation
K'ómoks First Nation
Lake Cowichan First Nation
Lekwungen (Songhees) Nation
Lyackson First Nation
MÁLEXEŁ (Malahat) Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
SEMYOME (Semiahmoo) First Nation
shíshálh First Nation
Snuneymuxw First Nation
Słwxwú7mesh (Squamish) Nation
Snaw-naw-as (Nanoose) First Nation
SĀÁUTW (Tsawout) First Nation
Stz'uminus First Nation
SXIMEŁEŁ (Esquimalt) Nation
Tla'amin (Sliammon) Nation
Tsawwassen First Nation
Tseil-Waututh Nation
T'Sou-ke Nation
Wei Wai Kum (Campbell River) First Nation
We Wai Kai (Cape Mudge) First Nation
WJOŁEŁP (Tsartlip) First Nation
WŚIKEM (Tseycum) First Nation
x^wməθk^wəyəm Musqueam
First Nations Leadership Council
Hul'qumi'num Treaty Group
Laich-kwil-tach Treaty Society
Nanwakolas Council
Naut'sa mawt Tribal
Te'mexw Treaty Association
Bowen Island Municipal Council
BC Shellfish Growers Association
Association of Denman Island Marine Stewards
World Wildlife Fund Canada
Denman Island Local Trust Committee
Hornby Island Local Trust Committee
Islands Trust Council
Islands Trust website