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December 9, 2019

File Number: 0400-30; 5020-30

via e-mail: FLNR.Minister@gov.bc.ca

The Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and
Rural Development
PO Box 9352 Stn Prov Govt
Victoria, BC V8W 9M1

Dear Minister Donaldson:

Re: Request for more resources for enforcement of aquaculture tenure licences

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 the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) allocate more resources to ensure aquaculture tenure requirements can be enforced effectively. We also wish to express support for the Provincial Aquaculture Program's efforts to increase the minimum security amounts to be paid by tenure holders and to require that debris management plans be adhered to prior to renewal or approval of new tenure applications.

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.

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 Department of Fisheries and Oceans Canada (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. This area forms a unique ecological region (Coastal Douglas-fir Biogeoclimatic Zone) in Canada, with less than eight percent of this area supporting rare and fragile ecosystems. This natural ecosystem provides specialized habitat for many rare species that are only known to occur in specific ecosystems. Intense development pressures have resulted in habitat fragmentation, degradation, and loss.

The Islands Trust Council supports the Provincial Aquaculture Program's implementation of protocols through aquaculture tenure agreements to ensure 'safe, clean and sanitary conditions' are upheld by tenure holders. Despite recent efforts to improve the amount of aquaculture debris in local waters, the Denman Island Local Trust Committee, a locally-elected body within Islands Trust, continues to regularly receive complaints regarding marine plastic debris and ghost netting washing up on Denman Island shores.

Islands Trust supports the efforts being made by the provincial government to establish and/or enforce management plans, regulation, and legislation for tenure agreements. All parties want to ensure the aquaculture industry succeeds while adhering to best practices to be good neighbours and environmental stewards. Accordingly, we request that FLNRORD allocate more resources to ensure aquaculture tenure requirements can be enforced effectively.

Thank you for considering this matter.

Yours sincerely,



Peter Luckham

Chair, Islands Trust Council

pluckham@islandstrust.bc.ca

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cc: Islands Trust Area MLAs
Federal Minister of Fisheries and Oceans,
and the Canadian Coast Guard
BOKÉCEN (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
Skwxwú7mesh (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
WJOLEŁP (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