



Garden City Conservation Society

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October 19, 2014

Re: [Proposed Aquaculture Activities Regulations](#)

Ed Porter, Manager, Aquaculture and Regulatory Initiatives, Department of Fisheries and Oceans:

After reading the proposed Aquaculture Activities Regulations, we urge that aquaculture for fish, especially salmon, be limited to closed pen containment as soon as possible.

As an interim step, the changes to the regulations need to reduce the harm as much as possible. As a low-budget society with broad conservation goals we are going to rely on the analysis by Anna Johnston, Staff Counsel, West Coast Environmental Law, in phrasing our recommendation about the means to harm reduction.

We concur with the West Coast Environmental Law conclusion that to minimize the adverse impacts of net-pen aquaculture, the Regulations should at least require:

1. That any deposits be in accordance to substance—or other applicable environmental management—plans approved by DFO as conditions of aquaculture licenses.
2. That such plans include frequent, ongoing environmental monitoring and reporting on environmental and cumulative effects.
3. That the plans be required to be designed to achieve zero discernible direct or cumulative impacts on wild fish or fish habitat.
4. That the design and approval of the plans be transparent, involve consultation with First Nations and include opportunities for meaningful public participation.
5. That DFO be empowered to impose penalties and/or suspend or revoke the ability of facilities to deposit the prescribed substances if they fail to follow the approved plans or to achieve the goal of no environmental harm.

Sincerely,

Jim Wright
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