



Wild Salmon Defenders Alliance
#213 – 46693 Yale Road
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April 30, 2018

Honourable Adrian Dix
Minister of Health
5022 Joyce St.
Vancouver, BC V5R 4G6

Dear Minister Dix,

Wild Pacific salmon are in crisis. Fraser river sockeye populations have declined so drastically that they have been recommended for listing as an endangered species by the Committee on the Status of Endangered Wildlife in Canada. First Nations on Vancouver Island, and all along the Fraser river, including the Musqueam First Nation in your riding, are suffering devastating impacts to their culture and physical health due to lack of access to the wild salmon they depend on for thousands of years as an important source of nutrition.

The dismal salmon returns over the past few decades have deprived people of this healthy food and many are being forced into economic hardship due to food insecurity and the “empty freezer” syndrome. High rates of nutrition related illness such as diabetes, anemia, heart disease, dental caries and obesity are becoming widespread due, in part, to the loss of a traditional wild salmon diet.¹⁻²

The salmon aquaculture industry may argue that farmed fish could function as an alternative to wild salmon. This is not the case. Besides being a non-native species with no cultural or spiritual significance, when compared to wild Pacific salmon, farmed Atlantic salmon (*Salmo salar*) are higher in synthetic antioxidants, PCBs, pesticides, brominated flame retardants and other toxins. While fatty fish is considered part of a healthy diet today, physicians and nutritional scientists have warned pregnant women and children to not eat Atlantic farmed salmon due to the staggeringly high levels of PCBs and other contaminants in the feed that accumulated in the farmed salmon.³ Today, it is known that PCB exposure in early pregnancy disturbs glucose metabolism and increases the risk of gestational diabetes in the mother and increases the risk of type 2 diabetes in the child.⁴ For all women, it has been determined that an increased exposure to PCBs increases the risk of type 2 diabetes.⁵ In Canada’s total diet study of farmed compared to wild fish (Vancouver, 2002) the level of PCBs, flame retardants and dioxins were typically over 4-times greater than those observed in wild Pacific salmon in the Vancouver market.⁶ Compared to farmed land animals, farmed Atlantic salmon can take up to 10-times more persistent organic pollutants like PCBs.⁷⁻⁸

There are also concerns about unsustainable strategies to manage disease and pathogens on fish farms that contribute to growing antibiotic resistance to human medicine and resistance to the bath chemicals used to treat sea lice that damage crustaceans such as shrimp and crabs in the environment.

The NDP government states it is working with Fisheries and Oceans Canada and First Nations in the Broughton Archipelago area to ensure everything possible is being done to protect wild salmon. If this is so, why was the enterococcus/PRV-contaminated blood water from fish

processing plant pipes not shut off as a precautionary measure before proceeding with the investigation into the blood water pouring into migration routes of wild salmon? This situation puts endangered wild salmon at further risk of irreversible harm as scientific evidence shows PVR causes HSMI, and it's highly contagious. In addition, the blood water was found to have high levels of enterococcus bacteria that may be harmful to humans. Are the Vancouver Island Health authorities looking into what species of enterococcus are in the blood water, what levels have been found at nearby beaches, are they antibiotic resistant, and are the open net pen fish farmers feeding it to their fish? Given the urgency of this situation, this needs to be given a high level of priority for the health and safety of both wild fish and people in the community.

We are encouraged by the steps taken by your government to engage the Namgis, Mamalilikulla and Musgamagw people who have never given their consent for fish farms to be in their territory. However, in the meantime, we see the industry re-stocking fish farms in those very territories. Minister of Forests, Lands, Natural Resource Operations and Rural Development, Doug Donaldson, has stated "while my ministry is responsible for the issuance of tenures under the *Land Act* that authorizes the occupation of submerged Crown land for the purpose of finfish aquaculture, the federal government is the primary regulator of aquaculture activities and facilities. DFO's mandate comprises all matters related to the production of farmed fish, fish health (including farmed and wild fish interactions), as well as any impacts to the marine environment." You should know that serious concerns have now been raised by the Auditor General Commissioner of Environment and Sustainable Development in regard of problems with the federal regulatory process.⁹ The regulatory mess in Canada overseeing the aquaculture industry adds to the importance of the province in protecting wild Pacific salmon including the decision within its jurisdictional authority and power not to renew fish farm tenures in the territorial waters of the Musgamagw, Namgis and Mamalilikulla Nations.

As a gesture of good faith, we urge the NDP government to announce that those fish farm tenures will not be renewed in June 2018 as your government pursues its process of discussing fish farms based on free, prior and informed consent with Namgis, Musgamagw and Mamalilikulla Nations. This is the path towards manifesting the NDP's commitment to honour the United Nations Declaration on the Rights of Indigenous People and would also be a meaningful step on the road to reconciliation with the Indigenous Nations. Please know you will have the support of voters across the province if your government makes the necessary decision to end fish farm tenures in defense of wild salmon.

Please let us know whether you support ending the fish farm tenures in the Broughton Archipelago area and working to transition fish farms onto land containment. By cooperating with Namgis, Musgamagw and Mamalilikulla Nations, the BC government would unite with Alaska, Oregon, California and Washington to create a Pacific coast free of open net pen Atlantic salmon farms. There is a better way forward for the environment and the BC economy-move fish farms onto land in containment, creating an essential barrier between fish aquaculture and wild salmon habitats. Elsewhere in the world, including in Norway, there is a movement towards land-based aquaculture. We look forward to your response soon as June is fast approaching at which time fish farm tenures are up for renewal.

Sincerely yours,

Eddie Gardner, & Tracy Lyster
Wild Salmon Defenders Alliance

CC Chief Don Svanvik, Namgis First Nation
Chief Willie Moon
Chief Bob Chamberlin
Grand Chief Stewart Phillips
Chief Chris Roberts, Wei Wai Lum First Nation
Hereditary Chief George Quocksister, Laichwiltach Nation
Chief Wayne Sparrow, Chief of Musqueam
Chief Robert Combes, Sqwe First Nation
Chief Michelle Lee Edwards, Sekw'el'wes First Nation
Chief Robert Gladstone
Chief Judy Wilson, Neskonlith First Nation
Honourable George Heyman, Minister of the Environment
Honourable Lisa Beare, Minister of Tourism, Arts and Culture
Honourable Scott Fraser, Minister of Indigenous Relations and Reconciliation
Honourable Lana Popham, Minister of Agriculture
Honourable Doug Donaldson, Minister of Forests, Lands, Natural Resource
Operations and Rural Development,
Andrew Weaver, MLA
Adam Olsen, MLA
Dr. Claudette Bethune

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[https://www.clinicalnutritionjournal.com/article/S0261-5614\(17\)30036-5/abstract](https://www.clinicalnutritionjournal.com/article/S0261-5614(17)30036-5/abstract)
2. "The health of Aboriginal peoples is worse than that of Canadians, in general, for almost every health status measure and condition.⁷ There is considerable evidence that many health problems experienced by Aboriginal peoples are related to diet; they include anemia, dental caries, obesity, heart disease and diabetes.²⁻⁴"
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S36 CANADIAN JOURNAL OF PUBLIC HEALTH VOLUME 96, SUPPLEMENT 3
Determinants of Healthy Eating in Aboriginal Peoples in Canada The Current State of Knowledge and Research Gaps
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[Volume 115](https://doi.org/10.1016/j.envint.2018.04.011), June 2018, Pages 127-132
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