



July 23, 2018

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Re: CAIA Response to DFO's Invitation to present to the National Advisory Panel on MPA Standards

Thank you for the invitation to present to the National Advisory Panel on Marine Protected Area (MPA) Standards, at their meeting on July 6-8, 2018 in Ottawa. Unfortunately, due to conflicting schedules, CAIA was unable to participate in the Panel session.

In general, CAIA and our members support the MPA process. The identification of areas for protection is critical and if properly done, should result in greater environmental protection and clarity for economic and social development. In this submission we identify several principles that should be considered for the MPAs process specific for Canada.

We would like to emphasize the opportunity for aquaculture in Canada and underline how important it is that aquaculture interests be involved in any MPA planning from the very start of the process. The Finance Minister's Economic Advisory Council, in their 2017 Report (the "Barton Report") identified aquaculture as a important sustainable economic development opportunity for Canada. As the commercial industry has only been in Canada about forty years, the sector has made very significant improvements in sustainable practices and is now, by almost all sustainability measures, *the most sustainable food protein production in Canada*.

While the IUCN document gives brief mention to aquaculture, the opportunity specific to Canada differentiates Canada from many other nations. Our long coastline and cold northern waters provide excellent conditions for the farming of cold water shellfish and finfish species. We need to emphasize as well how critical aquaculture is from an environmental and species protection perspective: the oceans are facing very significant pressures, and yet the demand for seafood is increasing around the world (according to the latest Food and Agricultural Organization of the United Nations "2018 State of the World Fisheries and Aquaculture" report by approximately 7-10% per year). The only solution to meet the demand and protect wild stocks is sustainable aquaculture, already making up 53% of the global seafood production for humans. From a social perspective, many coastal communities have been given new life through aquaculture, and this potential exists for many other rural, and often economically depressed, coastal communities.

Development of Marine Protected Area Standards for Canada

As will be further discussed below, Canada's aquaculture sector is an environmentally responsible food production sector that has major potential for growth. We find that the IUCN document is largely silent on the critical role aquaculture must play in achieving marine protection objectives and global food requirements. We therefore urge the Panel to ensure that their recommendations for MPA standards consider all three inter-related components of sustainable development: environmental protection, social well-being, and economic prosperity.



Specifically, we would propose the following principles be given strong consideration in any MPA process for Canada:

1. **Economic/Social Considerations:** That economic and social considerations be given equal weighting to environmental ones to arrive at truly sustainable solutions. For example, as noted above, aquaculture is an important economic driver in many Indigenous communities. Section 4.1 of the IUCN guidelines recognizes the value of integrating “conservation efforts with social, economic and cultural concerns for the territories near the MPA”. Section 5.2 of the IUCN guidelines are also clear on balancing socio-economic considerations: “It is better to create and manage successfully an MPA which may not be ideal in ecological terms, but which achieves the purposes for which it is established, than to labour vainly to create the theoretically ‘ideal’ MPA. Where there is a choice of ecologically suitable areas, as there often is in the sea, the dominant criteria for selection of MPA locations, boundaries and management systems should be socioeconomic. Where there is no choice, ecological criteria should come first. In general, not enough weight has been given to socio-economic criteria in the selection of MPAs”.
2. **Aquaculture as a Partner to Wild Stock Protection:** Sustainable aquaculture should generally be seen as a partner to oceans and wild stock protection, and not an antagonist, especially with regards to new sites and siting science. We believe this is also consistent with section 3.4 of the IUCN guidelines, the very stringent regulation of our sector at both federal and provincial levels ensures “that aquaculture, whether inside or outside the MPA, should be carried out in such a way that it does not damage the MPA, from the transmission of disease, the release of nutrients or in other ways”.
3. **Ensure Alignment with Other Planning Regimes:** MPAs must co-exist with other planning exercises, such as coastal plans or area management plans. Careful alignment, no duplication, and early engagement with these other plans is critical. This is consistent with the IUCN guidelines, section 1.2, which recommends that “establishment of an MPA should be integrated with other policies for use of land and sea”. Where other pre-existing planning processes are in place, we propose that MPAs should defer to these existing processes, and that these processes in many cases be considered for recognition as an MPA.
4. **Consider the Global Situation:** Connected to the above, consider that many of the reasons for pressures on wild stocks are related to global seafood demand, and the solutions must also consider Canada’s role in both oceans protection but also seafood production and supply.
5. **Business Certainty:** Given the economic importance of our sector, it is critical that the MPA development process involve our sector to ensure longer-term certainty for continued business investment in Canadian aquaculture, to deliver on the economic growth and employment outlined above. Section 3.1 of the IUCN guidelines supports such engagement of affected sectors, noting that where sectors “are not involved from the beginning, they will be inclined to see the MPA planners and managers as either not interested in their sector or actively trying to disadvantage their interests.”

General Comments

- The need for sustainable farmed seafood is increasingly clear. Global demand for seafood is rising rapidly and is expected to double by 2050. At the same time, wild seafood stocks are facing serious pressures, with the United Nations in 2016 saying that over 90% of the world’s fish stocks are either over- or fully exploited.



- Farmed seafood is today among the fastest growing and most important food sectors in the world, accounting for over fifty per cent of the world's total seafood production.
- Sustainable farmed seafood is a critical answer to the world's food and ocean conservation needs, as well as to making major contributions to reducing the environmental footprint of food production.

An Environmentally Sustainable Sector

- Our industry works to minimize environmental interactions through measures such as proper siting, management of habitat impacts, and escape prevention measures -- compliant with international standards for social, environmental and food safety responsibilities.
- Our environmental practices are supported by federal and provincial regulations, international requirements, and third-party sustainability certifications.
- Compared to all other animal protein sources, and by almost all measures (energy, water, space utilization, feed and use of medicines) farmed seafood is a very efficient food protein source. And the footprint of Canada's farmed seafood sector is considerably smaller than in other competing countries (e.g. Norway production is 157.8 tonnes/km of coastline, UK is 9.7 tonnes/km, Canada is 2.1 tonnes/km).

A Socially Responsible Sector

- Farmed seafood in Canada is a world-leader in terms of programs and standards for seafood safety, with sophisticated traceability and stringent independent third-party certification systems in place.
- The Canadian farmed seafood sector generates an estimated 25,000 full-time jobs related to production and processing, with most of these activities taking place within rural and coastal communities across Canada. These communities have seen how farmed seafood companies and their employees make a positive impact by supporting local events and investing in communities through corporate giving, volunteering, jobs, and infrastructure.
- More than 40 Indigenous communities are directly or indirectly involved in farming seafood across Canada; this involvement occurs in nine of the ten Canadian provinces. In addition to those Indigenous communities already participating in farming seafood, there are many others whose traditional territories have the biophysical capacity to support farmed seafood development. We estimate that future growth of the industry in partnership with Indigenous communities could deliver 3,480 additional jobs for Indigenous peoples earning \$170 million within in the next five years, and 8,230 additional jobs earning over \$410 million within 10 years. Chief John Smith of the Tlowitsis First Nation in British Columbia describes the impact salmon farming has had on his community: ***"We lost a lot of our people when the local economy dried up, we lost our language and much of our traditional way of life...now it is coming back and the fish farmers are helping our children grow."***

Delivering Significant Economic Benefits to Canadians

- Our sector's farming and fish processing activities alone deliver significant economic benefits at a local, community level in Canada – mainly within rural and coastal communities where well-paying, full-time jobs are greatly in need. Our farming and fish processing activities generate an estimated \$5.16 billion in economic activity, \$2 billion in GDP, and 25,000 full-time jobs for Canadians earning an estimated \$1.16 billion in wages in 2016.



- When the full value-chain of economic activity from the seafood farm to your plate is considered, Canadian farmed seafood generated a total of over \$7.3 billion in economic activity throughout the economy, \$3.75 billion in GDP, and \$2.18 billion dollars in wages for almost 54,000 Canadian workers in 2016.

Potential for Responsible Growth

- Canada's farmed seafood sector is poised for growth as a sustainable, innovative and global trade-oriented industry. Over the last 30 years, numerous expert studies have recommended that Canada adopt an innovative and pro-active approach to developing its aquaculture sector.
- The most recent call is from the Finance Minister's Advisory Council on Economic Growth report, also known as the "Barton Report." Looking at sectors with the greatest opportunity to grow Canadian jobs and economic opportunities, the first sector to receive extended focus was the agriculture sector. Aquaculture was a prominent focus of the recommendation. The Panel stated that by adopting a new and focused approach to aquaculture sector development, responsible, sustainable growth benefitting coastal and rural communities, First Nations and others can be achieved and meet the ever-growing global demand for Canadian farmed seafood: "What would Canadian leadership in global food production look like? Increase global market share (for aquaculture) to 0.6% (from 0.2%) and exports by almost US \$2.6B." (Advisory Council on Economic Growth "Barton Report", pp.10-12, Feb 6, 2017)
- In 2015, the Canadian Senate undertook a detailed study of the sector and issued its findings in a 2015 Report entitled *An Ocean of Opportunity: Aquaculture in Canada*: "Overall, our main message is that there is an ocean of opportunities for aquaculture in Canada. We are confident that the Canadian aquaculture industry can grow steadily within the next 10 years and do so sustainably – environmentally, economically and socially." (An Ocean of Opportunity: Aquaculture in Canada, Vol 3, p 7. Senate of Canada, 2015)
- The Canadian Council of Fisheries and Aquaculture Ministers (CCFAM) also recognized the potential for responsible growth of our sector in developing the CCFAM Aquaculture Development Strategy 2016-2019. Recognizing aquaculture's potential to create jobs, economic growth and prosperity in remote, rural, coastal and Indigenous communities, the Ministers adopted a three-year strategy to promote strong and environmentally sustainable aquaculture development, responsible growth and the engagement of stakeholders.
- CAIA and its members believe that our sector can grow in a sustainable manner to more than twice our current size. With the right governance and policy framework in Canada, as well as a supportive development strategy, our industry is poised to increase output by as much as 120%, while limiting our physical footprint to an increase of only 38%. We estimate that these growth objectives can be achieved while occupying only 1.35% of the total area biophysically suitable for aquaculture in Canada – a much, much smaller footprint than in other countries.
- From an economic standpoint, this level of production would generate the following benefits in local communities across Canada from our sector's farming and processing activities alone: \$9.8 billion per year in economic activity, almost \$4 billion in GDP, and full-time, year-round jobs for 47,700 Canadians, earning over \$2.2 billion in wages.



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*Farming Canadian waters with care.
Faire l'élevage en milieu aquatique canadienne avec soin.*

We believe our sector can deliver on sustainable, responsible growth in a manner that continues to respect protection of the marine environment. Thank you for the opportunity to provide this input.

Sincerely,

Timothy J. Kennedy
Executive Director