

February 15, 2021

Honourable Bernadette Jordan  
Minister of Fisheries and Oceans and the Canadian Coast Guard  
Minister's Office  
200 Kent Street  
Station 15N100  
Ottawa, Ontario  
K1A 0E6

Dear Minister:

Re: Proposed list of DU4, South Coast of Newfoundland under the "Species at Risk Act"

The Salmonid Association of Eastern Newfoundland (SAEN) has become aware that you, as the Minister in charge, are considering the "listing" of much of the range of Atlantic salmon in eastern Canada under the provisions of the Federal Species at Risk Act (hereafter SARA). As there are other organizations that are more closely aligned with the various mainland regions of the salmon's range this letter is wholly concerned with the COSEWIC defined DU4, the entire south coast of the island of Newfoundland.

SAEN is first and foremost a conservation organization, dedicated since 1979 to the conservation, protection and enhancement of wild Atlantic salmon in Newfoundland and Labrador. As such, we do believe there is value in the SARA and the work required by its provisions where warranted. However, we respectfully request that any SARA listing for DU4 be deferred for the following reasons.

1. The current COSEWIC "Threatened" status for DU4 is based on an assessment completed in 2010/11 and there is a new assessment scheduled for 2022. It would make sense to make decisions of such significance on up to date information rather than rely on ten year old data.
2. DU4 is much too large an area to be listed based on very limited data, a straight line distance of over 500 kilometers. The data used by COSEWIC to determine the "Threatened" status is based on counting fence data from just 4 of the 130 salmon rivers in the DU, two of which are closely adjacent to each other, are right in the centre of the current Newfoundland salmonid aquaculture industry and therefore directly threatened by that proximity. As such they are most assuredly atypical of other rivers on the south coast of Newfoundland. The other two rivers are in the eastern end of the DU (SFA9) and according to your Department's most recent assessments are considered healthy. There are no counting fences and therefore no data at all on the rivers in the western third of the south coast.
3. The listing of the entire DU4 as "Threatened" will eliminate all recreational and indigenous fisheries throughout the whole region, despite much of the area retaining healthy stocks able to sustain the existing fisheries under current regulations.
4. We note that the Inner Bay of Fundy region (DU15) was designated as "Endangered" in 2003 yet it took 16 years, until 2019, for a Species at Risk Action Plan to be prepared. An up to date assessment of that stock may well indicate that the only remaining Inner Bay of Fundy salmon are stockpiles of live gene material kept in storage and the very limited number of salmon

artificially reared for mating purposes. That does not suggest that SARA is an effective tool to help conserve wild Atlantic salmon stocks.

5. The Inner Bay of Fundy Action Plan clearly relates the growth of the open net pen aquaculture industry to the decline in wild salmon in the area. Rather than simply list the south coast of Newfoundland your Department should consider actively working to eliminate the threat to wild stocks posed by the continuing expansion of the aquaculture industry in the area.

Recommendations:

1. Defer any consideration of a SARA listing of the south coast of Newfoundland salmon until COSEWIC completes its upcoming 2022 assessment.
2. Sub-divide DU4 into smaller units that reflect the actual conditions of the rivers in each sub-division.
3. Consider the state of salmon stocks in each subsection before assigning a status to it.
4. Initiate and adequately fund a comprehensive scientific assessment of the impacts of open net pen aquaculture on south coast Newfoundland stocks of wild Atlantic salmon.

Thank you for your consideration of this matter.

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Robert Bishop  
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Salmonid Association of Eastern Newfoundland

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Atlantic Salmon Federation

Leo White  
Salmonid Council of Newfoundland and Labrador

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