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Correspondence/Meetings/General

The Honourable Bruce Ralston
Minister of Forests
Room 248 Parliament Buildings
Victoria BC V8V 1X4
Via email: FLNR.Minister@gov.bc.ca

Dear Minister Ralston:

RE: UPDATE OF MARINE INVASIVE SPECIES LIST AND REVIEW OF AQUACULTURE PERMITTING REQUIREMENTS

On behalf of the Capital Regional District Board (Board), I am writing to request the Ministry of Forests consider listing the red algae *Asparagopsis* on its invasive species list, and to recommend the Province of BC review potential gaps in seaweed aquaculture permitting with the appropriate federal ministries.

The Board recently directed staff to investigate concerns around a proposed land-based seaweed production facility in our region. The project raised two concerns: one is the introduction of new species of concern associated with an emerging industry to address climate change; and the other is the potential lack of coordination between the provincial and federal regulatory frameworks to review this type of project.

The project would see the cultivation of a marine algae to add to cattle feedstock to reduce greenhouse gas emissions. There is science to support the concept, and there are pilot and commercial projects underway globally. While the goal of addressing climate change through emission reductions across all possible sources is commendable and encouraged, the Board has concerns that this specific industry may introduce new invasive species to our coastal waters.

Research on the emerging use of seaweed as an additive in cattle feed indicates large-scale use of *Asparagopsis*. Certain species within the genus *Asparagopsis*, which are found in temperate and tropical waters, have invaded colder waters from the Mediterranean Sea to Britain and are considered one of the worst invaders in Europe. *Asparagopsis* is listed on the Commonwealth Agricultural Bureau International invasive species list. Currently, *Asparagopsis* is not listed on the Department of Fisheries and Oceans and the Canadian Coast Guard (DFO) Canadian Marine Invasive Screening Tool, nor on the federal or provincial prohibited or controlled aquatic invasive species lists. The company has now indicated that this species will not be used in the proposed project, but there is potential for other non-native species to be used.

Staff also identified a potential gap in permitting requirements for this proposed facility in regulations and authorities between the federal and provincial government. Listing of marine invasive species is the jurisdiction of the DFO; the Province is only responsible for maintaining a list of priority terrestrial and freshwater invasive species for British Columbia. The DFO is also

responsible for issuing BC aquaculture licenses for marine finfish, shellfish and freshwater (or land-based) operations, while the Province is responsible for licensing the commercial harvest of marine plants. However, an aquatic plant license from the Province is only required when the end use of the product is to be used for human consumption; therefore, land-based, commercial seaweed production for use as an additive in cattle feed does not require an aquatic plant license, even though the cattle themselves are intended for human consumption.

The Board respectfully requests that the Province of BC work with the federal government to update its invasive species lists, as well as review permit requirements for land and ocean based commercial production of seaweed intended for use as an additive to cattle feed to ensure a coordinated approach to coastal invasive species management.

Thank you for the opportunity to raise these concerns. We appreciate the ongoing work of the provincial staff and will continue partnering with them to reduce the impact of aquatic invasive species in our shared waters.

Sincerely,



Colin Plant
Chair, Capital Regional District Board

cc: CRD Board
Ted Robbins, Chief Administrative Officer, CRD
Larisa Hutcheson, General Manager, Parks & Environmental Services, CRD