

November 22, 2023

Species at Risk Program  
Fisheries and Oceans Canada  
PO Box 5667  
St. John's, NL  
A1C 5X1

Re: Species at Risk Act (SARA) Lumpfish Consultations

To All It May Concern:

On behalf of the salmon farming industry in Atlantic Canada, I am writing to address the potential SARA listing of Lumpfish (*Cyclopterus lumpus*) as Threatened (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/consultation-documents/lumpfish-2023.html>) and specifically the removal of the potential limitations on the “breeding, sale and use of Lumpfish as cleaner fish...and directed fishery for broodstock.”

The Atlantic Canada Fish Farmers Association represents 81 members including inter-provincial salmon producers and many of the businesses and organizations that support them. We are an industry funded non-profit association providing advocacy and resource support services for the finfish aquaculture industry operating in Atlantic Canada. Atlantic Canada’s salmon farming industry is one of this region’s biggest economic drivers. Salmon farming employs over 8,000 people in our region, generates \$2 billion in total economic output and grows over 323 million meals annually.

Salmon farmers follow an Integrated Pest Management Plan (IPMP) which outlines a multi-level approach to controlling sea lice combining preventative farming practices such as fish husbandry, fallowing and low stocking densities, and includes alternative sea lice treatments such as Lumpfish as “cleaner fish”. The loss of the ability to use Lumpfish would directly result in higher amounts of pesticide treatments on salmon farms.

Lumpfish have been an integral part of newer, environmentally friendly parasite treatments in the salmon farming industry for almost a decade. Lumpfish used as “cleaner fish” on salmon farms are not wild caught fish, but come from various Lumpfish hatcheries, where broodstock is maintained so that their production does not use nor impact wild populations. These hatcheries exist in New Brunswick, Nova Scotia and Newfoundland.

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[atlanticfishfarmers.com](http://atlanticfishfarmers.com) .....



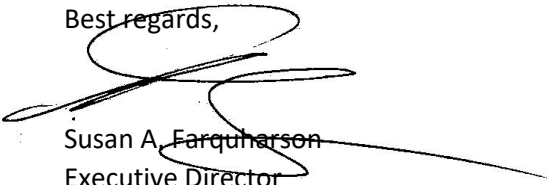
Lumpfish has been particularly effective as part of an industry IPMP for Newfoundland salmon farmers significantly reducing the need for chemical and medicinal treatments. As such, Lumpfish used as “cleaner fish” benefits the environment in which wild Lumpfish live.

We appreciate the opportunity to respond to the potential listing of these fish but would also like to emphasize to the Committee that other species listed as Threatened under SARA, such as Atlantic Sturgeon<sup>1</sup> and Atlantic Salmon<sup>2</sup> have specific populations (i.e., Saint John River strain) that continue to be used for breeding, sale and use, therefore setting the precedent for other populations of listed species. According to Jansson et al 2023, Lumpfish also have distinct subpopulations like salmon, particularly West and East Atlantic, Gulf of St. Lawrence and Newfoundland as well as Maine.

The Act does not allow harm, or activities that would further endanger species recovery, but farming of a SARA listed species is not specifically prohibited. As such, like the sturgeon and salmon populations, the farmed use of the non-endangered subpopulation of lumpfish could be allowed under SARA. One proposed section on Aquaculture states: “The breeding, sale and use of Lumpfish as cleaner fish could not continue. It would not be possible to permit a directed fishery for broodstock”. We request that section be rewritten to allow the breeding, sale and use of Lumpfish subpopulations with conditions applied to manage their use as we see with other listed species.

In closing, we want to ensure the Committee recognizes the years of research and millions invested by industry, academia, and government researchers that has gone into the use of Lumpfish as an important part of an effective IPMP. This research has resulted in a sustainable cultivated Lumpfish production that does not impact wild Lumpfish populations. Prohibiting the use of Lumpfish as “cleaner fish” for the Atlantic Canada salmon farming industry would make salmon farming less sustainable as well as negatively impact the economy by shutting down a thriving Lumpfish production sector.

Best regards,



Susan A. Farquharson  
Executive Director

cc:

Hon Margaret Johnson, NB Agriculture, Aquaculture and Fisheries

Hon Cory Deagle, PEI Fisheries and Communities

Hon Elvis Loveless, NL Fisheries, Forestry and Agriculture

Hon Kent Smith, NS Department of Fisheries and Aquaculture

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<sup>1</sup> COSEWIC. 2011. COSEWIC assessment and status report on the Atlantic Sturgeon *Acipenser oxyrinchus* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 49 pp. ([www.sararegistry.gc.ca/status/status\\_e.cfm](http://www.sararegistry.gc.ca/status/status_e.cfm)).

<sup>2</sup> COSEWIC. 2010. COSEWIC assessment and status report on the Atlantic Salmon *Salmo salar* (Nunavik population, Labrador population, Northeast Newfoundland population, South Newfoundland population, Southwest Newfoundland population, Northwest Newfoundland population, Quebec Eastern North Shore population, Quebec Western North Shore population, Anticosti Island population, Inner St. Lawrence population, Lake Ontario population, Gaspé-Southern Gulf of St. Lawrence population, Eastern Cape Breton population, Nova Scotia Southern Upland population, Inner Bay of Fundy population, Outer Bay of Fundy population) in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xlvii + 136 pp. ([www.sararegistry.gc.ca/status/status\\_e.cfm](http://www.sararegistry.gc.ca/status/status_e.cfm)).