

From: Ford, Sharon <fords@dfo.mpo.com>
Sent: Sunday, September 12, 2010 10:50 PM
To: Taekema, John Bernie <John.Taekema@dfo-mpo.gc.ca>; Porter, Edward <Edward.Porter@dfo-mpo.gc.ca>
Cc: Ford, Sharon <Sharon.Ford@dfo-mpo.gc.ca>
Subject: RE: Further - sorry for the bits and pieces
Attach: PAR policy benthic Sept 12 2010 Draft 12SF-BT.doc

To a great extent, it is not a compliance issue on the farms part if they were sampling where told do do so. One would normally expect to maintain the same sampling sites year after year for trend data. But that is another debate.

Try this version of the document. . In the end, although part of me thinks we should write the policies as if they were national and hence op directives become very impt to allow for regional differences, it seems easier in the end to write the policy first for BC. This means the directives have less info in them than maybe I originally thought they would.

I want the Directive sections to be very specific - protocols, differences. It shouldn't set out new compliance measures or thresholds. Those should all be in the policy. I have gotten ride of any info that was in the policy (never have stuff in 2 places if you can help because it gets hard to maintain consistency). I found the parts towards the end a bit hard to follow - the Survey stuff had a section in the middle about extra requirements for non compliance. The logic should be (1) baseline; (2) operational surveys, and (3) extra monitoring in cases where thresholds being exceeded. Need to go back up to policy part on monitoring and mention 3 types of surveys vs 2.

That is it for now.

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From: Taekema, John Bernie
Sent: September 12, 2010 10:42 PM
To: Ford, Sharon
Subject: RE: Further - sorry for the bits and pieces

Further to my most recent E-Mail I can attest when I was auditing fish farms for the past couple years including to up to July this year the level of compliance with the FAWCR was falling. The reason was we were looking at locations other than where historically samples were taken based on DEPOMOD because we suspected the highest concentrations of organics were not being found. We found problems at about 25% of the farms we audited.

From: Ford, Sharon
Sent: September 12, 2010 10:33 PM
To: Taekema, John Bernie
Subject: RE: Further - sorry for the bits and pieces

A baseline survey is more extensive than the regular monitoring?

From: Taekema, John Bernie
Sent: September 12, 2010 10:30 PM
To: Ford, Sharon
Subject: RE: Further - sorry for the bits and pieces

I think we would use DEPOMOD as you outlined in your most recent previous E-Mail. To ensure that the model is correct and the appropriate amount of compensation is being asked for an enhanced sampling and monitoring would be required and completed at peak biomass to confirm where they 5 g C contour line (ie. HADD sulphide concentration) actually is.

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The problem with DEPOMOD is that in many cases it is using current meter information generated many years ago. These meters at that time were not always placed in areas which represented the current flow associated with the present locations of the containment structure arrays and so the predictions do not necessarily reflect the present footprint reality.

One thing we should consider requiring is up-to-date current monitoring reflective of the present site conditions unless the licence holder can prove that the current data used is appropriate.

I don't know if you picked up on it but I put a clause in the draft policy and directive requiring industry to complete a "baseline" survey during the first peak biomass event after December 18. The reason for this is to find out where that footprint is in relation to both the DEPOMOD predictions and the HADD authorization or potential compensation requirements.

Bernie

From: Ford, Sharon
Sent: September 12, 2010 10:19 PM
To: Taekema, John Bernie
Subject: Further - sorry for the bits and pieces

From what you are saying, we wouldn't use DEPOMOD operationally -
1) it would require a completely different monitoring program from the regulatory one to assess the accuracy of compensation requirements? And it is too inaccurate to use in requiring response plans?

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