

From: Jack Elliott <jackelliott@shaw.ca>
Subject:
Date: March 10, 2010 7:41:35 PM MST (CA)



1. **From:** jackelliott@shaw.ca
Subject: Open VS Closed Containment Salmon Farms
Date: June 12, 2009 10:50:35 PM MDT (CA)
To: Min@DFO-MPO.GC.CA

Dear Minister Shea:

I am one of many Albertans with the means and the inclination to sport fish for BC wild salmon every summer. In fact, there are many Albertans like myself who have traditionally been considered supporters of the Conservative party. As such, many salmon sport fishermen in this province are disturbed by the yearly decline we see in wild salmon stocks on the BC coast, which we increasingly perceive as being caused by the deleterious effects of open net salmon farms, increasing sea lice infestations, and uncontrolled pesticide use and waste disposal at these farms.

I for one have consistently watched your department's ongoing denial of the foregoing, your ongoing denial of your own considerable base of scientifically derived and published research data on wild salmon, and your lack of effective oversight of these farms. These salmon farming companies seem to be allowed practices in BC which they are often denied in their home countries of origin. Even Canadian job opportunities at these farms are miniscule -- compared to what had been available in the formerly thriving wild salmon fishery -- thus, we get paltry job benefits in Canada from salmon farming while the profits are mostly shipped offshore. And throughout this dog's breakfast of resource management inconsistencies, wild salmon stocks continue to decline significantly in BC.

I imagine one of your pat responses will be that it is the BC govt., not DFO, which licenses salmon farms, even when sited in wild salmon migration and nursery areas; you merely oversee the industry. The problem is you don't appear to effectively oversee the industry, but rather you appear to actively foster open net salmon farms -- rather than upholding the statutes and intent of the federal fisheries act, which, you may be surprised to learn, is still the law throughout Canadian waters.

Rather than continuing down such a self-defeating path at the expense of wild Canadian fish stocks and Canadian fishermen, why don't you simply foster closed containment salmon farms and rigorously enforce decent environmental standards and regulations for them? Such an initiative would surely remove many of the pollution problems caused by open net farms in wild salmon waters, and they may even be more labor intensive -- not such a bad thing in a major recession. Then we'll find out which companies are really committed to running environmentally sound fish farms in Canada, and which are not. Good riddance to those who are not so committed.

As I see it, the alternative is to soon see another fishery disaster on the scale of the northern cod disaster. Such a disaster will be most certainly laid directly on your particular political doorstep, and on the doorstep of the Conservative party. And I am sure that every politically aware salmon sport fisherman in Alberta will view the matter in exactly the same light. In fact, I will make absolutely sure they do so, if such a day arrives.

In the interim, I sincerely suggest you work hard getting the BC govt. onside with you to strive to foster a significantly better way to farm salmon in Canada, all the while paying closer attention to your own body of research on wild salmon, and doing a much better job of enforcing the fisheries act on the BC Pacific coast.

Otherwise, what point is there in having a Minister of Fisheries and Oceans and DFO in the first place, rather than simply a larger federal Dept. of Agriculture?

Jack Elliott

2. **From:** Min@DFO-MPO.GC.CA
Subject: Reply from Fisheries and Oceans Canada
Date: August 25, 2009 10:33:43 AM MDT (CA)
To: jackelliott@shaw.ca

Mr. Ja <<Initial Request for 2009-001-01846.TIF>> ck Elliott
< jackelliott@shaw.ca >

Dear Mr. Elliott:

Thank you for your correspondence of June 13, 2009, in which you express your concern over salmon aquaculture operations in British Columbia.

I understand your concerns, and appreciate the opportunity to assure you that one of the highest priorities of Fisheries and Oceans Canada (DFO) in Pacific Region is the conservation of Pacific salmon stocks.

The coastwide scope of the decline that has occurred across all Pacific salmon species suggests that this decline is associated with much larger ecological events than localized salmon farming. These events include climate change and changes in ocean productivity along our West Coast.

In addition to recognizing the impact of global changes, the Department also understands potential impacts of local conditions.

DFO supports the development of sustainable aquaculture within the context of conserving and rebuilding our wild Pacific salmon. The Department ensures that all aquaculture operations are subject to rigorous environmental standards under a number of statutes and regulations, including the Fisheries Act and the Canadian Environmental Assessment Act, to ensure our marine ecosystems are not compromised.

In addition, Canada's Policy for the Conservation of Wild Pacific Salmon, which is the basis for fishery management plans, sets out a process for the protection, conservation and rebuilding of wild salmon and their marine and freshwater ecosystems.

DFO is committed to continually improving the management of aquaculture based on the best available science.

You raise the issue of government management. Mr. Justice Hinkson's recent decision in *Alexandra Morton et al v. the A.G. of British Columbia and Marine Harvest Canada* states that, until February 2010, the Province of British Columbia will continue in its current role managing aquaculture within the province. The Department is giving the implications of the decision full consideration, including discussions with the Province of British Columbia and broad-based consultations.

You suggest the possibility of closed containment. DFO has studied closed-containment technologies. The Department has supported research into the development of innovative technologies that enhance the efficiency of production systems while reducing impacts to the environment.

A 2008 workshop on closed containment held by the Canadian Science Advisory Secretariat highlighted that while there are no closed, confined systems currently being used exclusively for Atlantic salmon, there are potential technologies that show promise for improving Atlantic salmon production and for restricting and controlling interactions. The next steps will be to use the knowledge contained in the technical reviews in conjunction with a socio-economic analysis that is underway to help inform potential development of pilot projects in the future.

DFO's Science Branch has worked closely with the industry on several in-water "bag" systems (an initial form of closed containment) to reduce risks of sea lice transmission. A modelling system has been developed to test the economic and biological feasibility of such systems, while considering such variables as current conditions, temperature, siting, etc. The model would allow industries and aquaculture regulators to make informed decisions about the efficacy of containment systems.

Important questions remain unanswered regarding the potential environmental implications of commercial-scale salmon production in closed-containment systems, such as energy demands. Further scientific research is necessary before closed-containment fish farming becomes a practical and realistic alternative.

Thank you for taking the time to write to me with your concerns. Please be assured that the Department will continue to work to conserve and protect salmon stocks for current and future generations.

Sincerely,

Signed Original is Attached

Gail Shea, P.C., M.P.

Ministerial Correspondence Control Unit
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3. **From:** jackelliott@shaw.ca
Subject: **Re: Reply from Fisheries and Oceans Canada**
Date: August 26, 2009 7:35:55 PM MDT (CA)
To: Min@DFO-MPO.GC.CA

Dear Minister Shea,

Thank you for prompt and detailed reply.

I'm assuming that if you can say that the coastwise decline of Pacific salmon stocks is ... *associated with much larger ecological events than localized salmon farming ... includ[ing] climate change and changes in ocean productivity along our West Coast*, then I think it is fair to ask you if your department has done sufficient baseline scientific research to reasonably validate such broad-based conclusions?

I would be considerably more comforted if you could define your reference(s) for your conclusions, and I look forward to seeing what you might offer in that regard.

Yours sincerely,
Jack Elliott
Magrath, AB

4. **From:** Min@DFO-MPO.GC.CA
Subject: **Reply from Fisheries and Oceans Canada**
Date: September 9, 2009 2:38:00 PM MDT (CA)
To: jackelliott@shaw.ca

Mr. Ja <<for dept. Scanning>> ck Elliott
< jackelliott@shaw.ca >

Dear Mr. Elliott:

Thank you for your correspondence of August 26, 2009, addressed to the Honourable Gail Shea, Minister of Fisheries and Oceans, in which you ask for further information about the scientific research on which policies of Fisheries and Oceans Canada are based. I have been asked to respond on Minister Shea's behalf.

I refer you to the Department's website as a source of information regarding some of the facts and myths surrounding fish farms, available online at
< <http://www.dfo-mpo.gc.ca/media/back-fiche/2005/salmon-eng.htm> >. Many issues are covered, including the safety and nutritional value of eating farmed salmon, the environmental effects of salmon farms, salmon farm wastes, additives to farmed salmon, escape prevention of farmed salmon, disease prevention, and closed containment.

I appreciate your concern for the future of our marine environments. Thank you for the opportunity to address your concerns.

Sincerely,

Signed Original is Attached

Trevor Swerdfager
Director General, Aquaculture Management

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