

JOHN C. MADDEN
3290 Cypress Street, Vancouver, B.C. V6J 3N6

September 21, 2010

The Hon. Mr. Justice Bruce Cohen
Cohen Commission
Suite 2800, PO Box 11530
650 West Georgia Street
Vancouver, BC V6B 4N7

Re: Closed Pen Fish Farm Economics

Dear Sir,

Further to my brief intervention at your hearing in New Westminster on September 20, I have attached for your information copies of the correspondence between myself and DFO as well as that between the BC Salmon Farmers Association and myself. Unfortunately, follow-up on the various web sites proffered as useful sources of further information in the replies did not yield the information I sought. I feel sure that the information must exist, but it does not seem to be easily available even though it is surely a vital component of any decision on the future of net based fish farm enclosures.

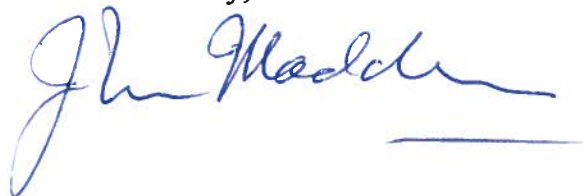
I feel confident that you will have much more success than I have had in tracking down the information we all need, and, moreover, you will be able to make the information accessible much more usefully.

I note that the last speaker last night made some interesting allegations regarding the use of lights to attract prey fish into salmon farm net pens. I believe you could also do us all a favour by investigating the veracity of this claim.

Two helpful sources of information on closed pen problems and economics could be: Dr. Kees Groot, a retired DFO scientist now living on Gabriola Island, and Dr. Dennis Connor, a former BC Science Council President who, I believe, was a Director of Future Sea Farms. Dr. Groot was a scientific advisor to the company. I think that Dennis is still living in Vancouver. As you know, the company was an early proponent of floating enclosed pens for fish farming, but sadly it did not survive.

Thank you again for undertaking this challenging but important commission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "John C. Madden", with a horizontal line underneath.

Att.

JOHN C. MADDEN
3290 Cypress Street, Vancouver, B.C. V6J 3N6

November 15, 2009

The Honourable Gail Shea, P.C., M.P.
Minister of Fisheries and Oceans
House of Commons
Parliament Buildings
Ottawa, Ontario, Canada
K1A 0A6

Re: Commercial Net Pen Fishery in B.C.

Dear Madam Minister,

It has become increasingly clear even to those of us not directly involved in B.C. fishing issues that as a society we have a lot to learn about factors influencing wild salmon abundance on the B.C. coast. In this connection, the Judicial Enquiry the Government has just launched is welcome and timely news.

I fully realize that the commercial farmed salmon fishery is but one of many factors which could influence wild salmon abundance, but it is one which many believe we could do something about.

I am told that DFO wisely adopted the precautionary approach/principle some years ago. According to the Department of the Environment web site:

The precautionary approach recognizes that the absence of full scientific certainty shall not be used as a reason to postpone decisions where there is a risk of serious or irreversible harm. Even though scientific information may be inconclusive, decisions have to be made to meet society's expectations that risks be addressed and living standards maintained.

Why then have we in Canada not yet required that farmed salmon be raised in closed container systems, especially in the light of the controversial role of fish farms in spreading sea lice to the wild salmon population? It appears to me that the available evidence clearly indicates that open net commercial fisheries can be, and in many cases, have been a severe threat to wild fish populations. Closed container systems appear to be a straightforward way to address most (though not all) of the problems related to the existing fish farms in B.C. The fish farming industry in B.C. is clearly important, particularly in some coastal communities, so it is vital to find a way for fish farms to survive and prosper without endangering our wild salmon populations.

None of this will be new to you. Indeed, I expect you largely agree with this summary.

The only logical reason that I can think of not to proceed with a mandatory closed container fishery is that it is prohibitively expensive. Those of us who are partially informed bystanders would have expected to see reports of studies detailing the relative

cost of closed container fisheries with respect to open net fisheries, explaining where the extra costs are incurred, and describing an intensive R&D program to bring these costs down. I have already asked this question of several presumed experts, but they seem not to be aware of such reports. (Some of us still remember the failed experiment of Future Sea Farms in Nanaimo, a spin-off from research conducted by DFO well over a decade ago. The approach seemed so sensible to me then that I became a (small) investor in the company.)

Hence my three questions to you are:

1. Do you agree that closed container fish farming is an important goal for the industry? If you disagree, can you please tell me why that is so, preferably with a reference to open publications which explain the background.
2. Can you point me to a reputable report or other publication which sets out the respective cost structures of closed and open pen farm fishing? It would be helpful if the information were tied back in some way to provide the expected difference in price per kg. of fish bought by the consumer.
3. I understand that two additional potentially serious problems with the farm fish industry are (a) the uncontrolled diffusion into the surrounding environment of drugs used to control disease, sea lice, etc. amongst the farm fish population, and (b) the depletion of lower order wild fish which are harvested in great quantity to provide feed for farmed fish. Can you point me to reports which will provide enlightenment on the severity of these problems and on steps contemplated to solve them, assuming they are real problems?

Like you, I am convinced that it is important that we learn more about these problems and then solve them! The better informed we voters are, the easier it will be for you to carry out your mandate.

Thank you for your consideration of my requests, and for your services to Canada as Minister of Fisheries and Oceans.

Yours sincerely,

John C. Madden