

Public Submission to the Cohen Commission

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December 19th, 2011

Requiem for a River

As the Cohen Commission's evidentiary phase draws to a close, we hope we are not hearing a requiem for a river. The Fraser River.

As a scientist, I believe substantial organizational change is essential for our fisheries regulators, including the CFIA, to see fish disease ecology as a practical concept.

To prevent a requiem, my recommendations include:

1. with respect to use of science by agencies with contrasting risk concepts
2. a code of science conduct to ensure the integrity of science used by decision makers and policy makers.

Multiple Agency use of scientific data

Following 18 months of testimony I was startled to discover that the Canadian Food Inspection Agency plays a key yet invisible role in fisheries management.

While the CFIA has not yet testified, clearly its expertise is vital in understanding the transmission of disease from animals to humans. At the same time, an audit completed in 2010¹ pointed out their lack of expertise in fish health issues.

The Agriculture ministry responsible for CFIA is not interchangeable with the DFO. The organizational culture of Agriculture is focussed on production systems. The DFO culture is directed to fisheries management and integrated environmental assessment. It would be logical for CFIA to view risk and uncertainty from the basis of production rather than ecological basics..

The CFIA possesses draconian emergency powers in the event of public human health risk. However, as recent limited testimony indicated, it does not apply the same powers to prevent or remedy an ecosystem health risk.

Evidently CFIA believes or is convinced that available scientific evidence does not indicate that ISAV is present in B.C. wild salmon. However, since CFIA does not test imported salmon eggs for virus or genotype, decisions on appropriate and adequate sampling protocol for Pacific Salmon is left to third parties i.e. DFO..

¹ Evaluation of the National Aquatic Animal Health Program (NAAHP) at the Canadian Food Inspection Agency and the Department of Fisheries and Oceans: June 29, 2010, CFIA, Ottawa.

Consequently CFIA's use of scientific information to develop policies or draw conclusions in areas where it lacks skill or personnel– as in the 2010 audit – bears scrutiny. The method of interagency co-operation also calls for examination.

Code of Science Conduct

Throughout the Cohen hearings we have seen twists and confusion of scientific evidence among policy makers and decision makers.

Despite some fish management decisions, DFO has in the past warranted public esteem through the high quality of its scientific work. Within the past decade such respect has noticeably diminished – partly through scientific reports being inaccessible or difficult to obtain. Informed stakeholders now believe the DFO should adopt a prudent course – consequent to the Cohen Commission - of publishing guiding principles for scientific integrity including:

- Ensure a culture of scientific integrity'
- Shield scientific data and analysis from inappropriate political influence;
- Maintain the free flow of scientific data;
- Introduce and maintain clear communication of results to all interested readers. .

Communication should be based on transparency, accountability and ethical behaviour.

DFO should be urged to integrate scientific advice and policy decisions. Also essential to scientific integrity is public assurance that DFO routinely and publicly explain the reasons for its policy decisions. Publication of full reasons is particularly essential when a decision appears inconsistent with scientific advice.

The principles of scientific integrity at the DFO are sorely strained by the ISAV issue.

As a scientist I perceive that one reason is that responsibility for the issue may be shared by several government departments. Further, a wide range of "expert" opinion exists and informed citizens accept that new analysis and findings emerge at a rapid rate, There are also substantial implications for fisheries regulation.

I also urge that decision makers refrain from anchoring firm conclusions to uncertain evidence.

Rather than leave decision makers to burrow down into the depths of bureaucracy for possibly out-of-date or lopsided advice, I suggest that the office of an independent science adviser be created to serve DFO. The office - set up collateral to the Cohen Commission - would engage with the decision makers to ensure information is current and relevant.

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Yours sincerely

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Vancouver, December 19, 2011