

July 28, 2010

Ed Porter, Team Leader, Regulatory Operations
Fisheries and Oceans Canada
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Dear Mr. Ed Porter:

I am responding to the 60-day public comment opportunity on the proposed *Federal Pacific Aquaculture Regulations* <http://www.gazette.gc.ca/cg-gc/about-sujet-eng.html> (left column "Part I Notices and Proposed Regulations" Vol. 144, No. 28, page 1933).

When BC Supreme Court ruled that the federal government must take over regulation of salmon feedlots, the intent was to bring the industry into compliance with the Constitution of Canada. But what Stephen Harper's Conservatives are trying to do instead is remove safeguards established by previous governments and open the door to privatizing the ocean, which is prohibited by the Canadian Constitution.

With his document Harper not only licences massive ecological damage, he depreciates the market value of BC feedlot salmon. No reputable retailer can afford to be seen with a seafood product raised under a licence to "harm, alter, disrupt and destroy" the ocean. The federal licences will be issued without consultation with First Nations.

*"Increasingly stringent international standards are driving seafood importing nations to require Canada to certify health (disease) status, not just food safety, of live aquatic animals and their products. ... Canada cannot meet these standards, and is facing increasing challenges to export market access. **Canada is already subject to a lesser market access than the United States, Europe ...**"* <http://www.gazette.gc.ca/rp-pr/p1/2009/2009-12-19/html/reg1-eng.html>

Canadian pathologists warn against holding millions of diseased salmon in pens (Traxler et al. 1993) and the graph below demonstrates the reason. There is a strong correlation between salmon feedlot epidemics and the declining Fraser sockeye. This must be examined, but the provincial government is stonewalling release of salmon feedlot disease records and Harper is stepping in to help.

These draft regulations ignore the International (OIE) and the Canadian Food and Health Inspection Agency standards by exempting salmon feedlots from full disease reporting. Harper is not only offering Norwegian companies the right to leave infected salmon in the water, he is protecting them from liability. If government and the industry are willing to throw away premium market value for disease secrecy we are warned this is a dangerous and strong priority.

Prime Minister Stephen Harper is also offering these Norwegian companies blanket authorization for "Harmful Alteration, Disruption or Destruction" of fish habitat (Section 35(1) *Fisheries Act*). This ignores the value of the oceans to communities across British Columbia. Oddly, these rules will not apply to eastern Canada, where the Minister of Fisheries resides.

Harper is going to legalize destruction of wild fish that become trapped in the pens, attracted by the bright lights and food in the water. There are no surplus wild fish and so this by-catch will compete with fishing quotas. Many feedlots are in rock cod conservation areas where fishermen are not allowed, but the feedlots will continue trapping unknown amounts. This is bad management and will affect herring, sable fish, salmon, lingcod and other important wild fish.

The federal Conservatives are proposing salmon feedlot licences be granted and amended without environmental assessment. This violates strong public demand for healthy coastal waters, but neatly resolves the irreconcilable issue of dumping over a ton/day/site of industrial waste into salmon habitat. These are the only feedlots that never have to shovel manure and chemical waste as it flows conveniently into public waters.

It is dangerous to humanity, (risking food security, drug resistance, disease mutation) to allow feedlots to contaminate natural environments with disease. Feedlots remove all the natural disease control mechanisms and thus allow viruses to mutate, multiply and jump to new species.

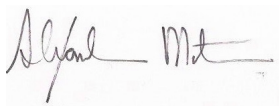
Because Mr. Harper is proposing to remove standards designed to protect the ocean from Norwegian feedlots, retailers like COSTCO will have to decide if their mission statements honor government or their customers. Promising to “*Exceed ecological standards required in every community where we do business,*” is meaningless if there are no ecological standards.

Salmon feedlots are an “ecology of bad ideas,” struggling to control disease with drugs, corrupting the foodchain by using warm-blooded animal products, plants and fish from the southern hemisphere as feed, displacing local businesses, turning a public resource into a corporate commodity with no public access, dyeing their fish pink to resemble salmon. If jobs were the goal, the federal Conservatives and BC Liberals would be working with the BC companies developing sustainable land-based aquaculture to create a viable, world-class product. Instead Mr. Harper is proposing to change the laws of Canada to allow unchecked pollution by a 92% Norwegian-owned industry associated wild salmon declines worldwide. Wild salmon are thriving everywhere this industry does not exist (Alaska, Iceland, western Pacific, areas of BC).

These proposed regulations are a signpost. If this was about fish, attention would have been paid to the market value of the product. Instead it risks one of the last naturally producing salmon regions in the world for a depreciating commodity. What these draft regulations do is clear away legislation established to protect Canadians and our coast from industrialization and privatization.

Ed Porter, the *proposed Federal Pacific Aquaculture Regulations* do not protect the interests of Canadians or the world and must not be adopted.

Sincerely,



Alexandra Morton

The Fraser sockeye decline began at the same time government failed to cull millions of IHN virus infected feedlot salmon on the Fraser River migration routes. Government ignored federal scientists who state infected Atlantic salmon should not be permitted in pens (Traxler et al 1993). The federal government also ignored warnings from their scientists that would have saved the North Atlantic cod. When the cod went extinct the Hibernia Oil wells appeared on the Grand Banks – the most generous food-producing area humanity will ever have was exchanged for oil.

