



January 24, 2022

Rebecca Reid, Regional Director General, Pacific Region
Fisheries and Oceans Canada
Via Email: Rebecca.Reid@dfo-mpo.gc.ca

Dear Rebecca,

Since late April 2022, Mowi employees have been meeting with representatives of the Aquaculture Management Unit to discuss proposed conditions of license. Many of the changes proposed are administrative in nature and we understand they are intended to improve reporting and reduce burden for DFO in managing the data our sector provides to you.

Unfortunately, there are some proposed changes that are of a material nature and could have significant impact on both the environmental and financial performance of Mowi's operations and the salmon farming sector generally. We have repeatedly requested access to the science advice on which some of the proposed changes are predicated. In one case, we have received an advance copy of a report and in another we are advised that the advisory process has yet to be held (planned for January 2022). As you know, one of the minimum standards associated with a Science Special Response is that "all reasonable efforts should be made to ensure that those who may be affected by the results of a SRP (e.g., industry) be able to contribute to the process". This is particularly important when there is no provision for the sector's inclusion in a subsequent science-related process prior to a decision. It is my understanding that there are no planned full CSAS processes for either the identification of areas to support a transition to area-based management or changes to the sea lice management threshold.

The salmon farming sector supports area-based management in principle and sees the identification of areas and management zones as an important first step; however, we also know that having management units that are ecologically relevant, as well as administratively convenient, is imperative. With respect to sea lice management, we would hope for a clear environmental management objective that leads to environmental benefit that is worth the increased demand on the limited tools currently available to us.

We do appreciate your officials' efforts to engage with license holders early in the conditions of license review process; however, we cannot meaningfully engage when the change is proposed in advance of the science advice on which it is meant to be based. We are concerned that the advice provided was /will be rushed based on artificial timelines set against license renewal in June 2022. It is my understanding that the Department can revise conditions of license during the license term based on conservation concerns. This should allow the for the provision of robust science advice through full CSAS processes.

The pace and complexity of what is being presented to us in terms of policy and regulatory change is outpacing our company's capacity, especially in the midst of unprecedented pressure placed on businesses and individuals. I know we do not need to remind you we are in a time of great flux and uncertainty for the BC salmon farming sector; we are not only reeling from the devastating Discovery Island decision, but we are facing the looming challenge of license reissuance without having received clear guidelines outlining the necessary requirements for that process. It is in this context that we send this letter with our concerns.

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Based on this, we respectfully request that the science advice requests related to Area-Based Management and Sea Lice Management be each subject to full formal CSAS advisory processes and that the proposed changes be deferred until the science advisory processes are complete.

Sincerely,



Cc:

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