

January 21, 2014

Dear Dr. Harpreet Kochhar:

Welcome to your new position as the new Chief Veterinary Officer for Canada.

I am writing to update you on the situation regarding ISA virus in British Columbia.

Many labs have reported ISA virus positive test results from farmed salmon raised in British Columbia. (See table below). The variant detected is generally European.

The CFIA has stated on websites, the media and in a letter to the World Organization for Animal Health (OIE) that they retested the ISAv-positive salmon from BC and could not repeat the positive results – that they were negative, suggesting ISA virus is not in BC farmed salmon. See below

This view led to the delisting of the Kibenge lab as the North American OIE reference lab for ISAv.

Shortly after, CFIA spokesperson Elena Koutsavakis is quoted by media that the CFIA:

*“... was obligated to confirm the test results at another lab, which did not corroborate Kibenge’s results audits ...”* <http://atlantic.ctvnews.ca/scientists-concerned-over-chill-in-reporting-of-salmon-virus-after-lab-delisted-1.1357850#ixzz2nUMw2dVy>

Then in December 2013, your predecessor, Ian Alexander, wrote that in fact none of my ISAv positive samples had been retested.

*“Officials of the CFIA have made every effort to explain to you why your samples could not be retested”* Dec. 5, 2013.

I assure you this is not the case.

Dr. Con Kiley, an official with the CFIA (Acting Director Aquatic Animal Health Division) wrote me on June 4, 2012: *“...please note that the National Aquatic Animal Health Laboratory System (NAAHLS) could not corroborate the results obtained from the OIE reference lab [the AVC Kibenge lab].”*

Dr. Brian Evans, with the CFIA and the Canadian Delegate to the World Organization for Animal Health (OIE) wrote to the Director General of the OIE on November 5, 2012 that the ISA virus results from the Kibenge lab were: *“...disparate and non-repeatable.”* Using the word “non-repeatable” suggests the tests were “repeated,” but we learn from Dr. Ian Alexander that they were not.

If Koutsavakis is correct, that the CFIA was “obligated” to confirm the ISAv-positive results, why were these tests never done and why was the OIE informed that they were done? These conflicting statements lead us to believe the CFIA may be protecting the Norwegian salmon farming industry operating in BC from a very inconvenient situation. CFIA representative, Dr. Kim Klotins testified at the Cohen Commission that if ISA virus is confirmed in BC, international sales in BC farmed salmon could stop. I recognize that according to Canadian standards ISA virus has not been “confirmed” in Canada, but there has to be a reason so many labs are reporting segments of ISA virus RNA in BC farmed salmon. If these segments are not ISA virus – what are they? It is important to review the research by Dr. Miller. There are consistent minute deletions in the sequence she found, this is typical of aquaculture-source ISAv “deleted” variants. Contamination a very weak explanation for ISA virus sequence with unique deletions. This is what eastern Canada is facing; a variant of ISAv with deletions not reported before.

ISA virus is an internationally reportable virus. The BC salmon farming industry has been given the green light to expand in BC. This means the risk of mutation and outbreak of a Pacific virulent variant of ISA virus has increased.

The CFIA decided that ISA virus is not in BC and lowered the credibility of a Canadian lab on the forefront of scientific research on this virus, without scrutinizing the test results themselves. My suggestion is to encourage this lab to finish its work and that you personally meet with Drs. Fred and Molly Kibenge and take an analytical view of what the tests show. There are reasons why contamination is not a good explanation for the cause of these positive results. The positive results are not a 100% match to any known ISA virus strain.

Thank you for your attention to this. When ISA virus breaks out in BC, the record will show a very poor, scientifically indefensible response by the CFIA, but with your appointment this could be changed. British Columbia has the opportunity to stop this outbreak before it happens. This is in the public interest. No one can speak with certainty about what a virulent strain of ISA virus that mutated in the Pacific will do to Pacific wild salmon – a highly – valued public resource. The opportunity to prevent such an outbreak as seen in Chile and currently in eastern Canada may be closing the door at this very moment.

Wishing you wisdom and integrity to face this international situation.

Alexandra Morton  
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## **CFIA STATEMENTS THAT REPORT RETESTING of ISAV SAMPLES FROM BC**

**Nov 8, 2011** – Draft Media Lines by CFIA/DFO “*Testing on the 11 wild-salmon species specimens provided to DFO by Dr. Kibenge ... was completed and found to be negative...*” Cohen Commission Exhibit 2097

**Dec. 2, 2011 - 2011** “*The Government of Canada in collaboration with the Province of British Columbia has completed testing all samples related to the suspected infectious salmon anaemia investigation in BC. Based on the final results, there are no confirmed\* cases of the disease in wild or farmed salmon in BC.*” **CFIA official news Bulletin** (Cohen Ex 2090)

“*Dr. Kiley said the corner stone of good science is repeatable test results – and at this stage none of the preliminary positive tests have been repeatable, so the presence of the virus cannot be confirmed*” <http://www.theglobeandmail.com/news/british-columbia/no-lethal-virus-in-pacific-salmon-cfia-says/article554784>

**Nov 23, 2012** - “*CFIA has challenged the validity of Dr. Kibenge’s tests, saying government labs couldn’t replicate his results.*” <http://www.theglobeandmail.com/news/national/ottawa-moves-against-pei-lab-that-reported-virus-in-bc-salmon/article5582798>

**July 5, 2013** – “*Because any suspected cases of ISA must be confirmed at a designated federal laboratory, the National Aquatic Animal Health Laboratory, overseen by Fisheries and Oceans Canada (DFO), conducted testing of fish samples. The positive test results reported by the AVC were not corroborated by the DFO laboratory.*” <http://www.inspection.gc.ca/animals/aquatic-animals/diseases/reportable/isa/statement-2013-07-05/eng/1373038790217/1373041710849>

**31 July – 2 August 2012 OIE Audit** of their ISAv reference lab: “*As indicated in the letter of assignment, the OIE Reference Laboratory for Infectious Salmon Anaemia (ISA) in Canada has recently undertaken diagnostic testing of samples and reported results that had not been reproducible in other laboratories.*” This suggests the audit of the Kibenge lab is reporting on tests that were never done.

**Nov 5, 2012** – CFIA letter to the OIE confirming acceptance of the audit recommendation to suspend the Kibenge lab “*... seeking to determine and address the scientific basis for the reporting of disparate and non-repeatable results...*”

1	Lab	year	farmed Chinook	Farmed Atlantic	wild	unidentified	citation	Species
2	Kibenge/ Jones			1	112		Cohen Exhibit 2045	Chinook, pink, sockeye,
3	Gagne	2011			1		Cohen Exh 2040	Routledge wild sockeye smolts/weak positive
4	Nylund	2013			6		Report 1, 231111[13]	sockeye (Harrison), pink, chum (Broughton)
5	Kibenge/ Routledge	2012			22		Routledge Nov 2011, June 04, 2012/ May 25, 2012	Cultus trout, Rivers Inlet sockeye
6	Kibenge/ Morton	2012		53	1		March 20, 2012, April 22, 2012, May 01, 2012. June 20, 2012, Aug 09, 2012, Oct 20, 2011, June 3, 2013, Feb 13, 2013, Jan 22, 2013, June 17, 2013	Farmed steelhead and Atlantic salmon from various Vancouver markets/ wild Chinook, Coho, chum, pink, sockeye, sea louse
7	Garver					2	Cohen Exhibit # 2043	
8	Marty		0	0	0	0		
9	Miller	2011	15		164		Cohen Commission Exhibit# 2053-136a/Exh 2060/2061	Creative salmon Chinook,Clayoquot Sound/ Fraser sockeye