

Manchester, Howie

From: Keith, Ian
Sent: October-10-17 9:38 AM
To: Sandberg, Krista; Waddington, Zac
Cc: Manchester, Howie; Paylor, Adrienne
Subject: RE: August sea lice report ready for review

My comment comes from the process of review by the Auditor General.

Not a criticism of individuals, but Bernie writes the licence conditions, DOJ advises, and industry is consulted. We end up with a regulation that will have gaps.

We are encouraged to use personal/professional relationships between company veterinarians and DFO veterinarians, and company biologists and DFO biologists to assure honest reporting, following the Shared Stewardship philosophy. This is relied upon, something the Auditor General understands, but there are many examples where companies have cited the law when refusing to do what the veterinarians and biologists request.

I recommend using the Bulletin whenever these weakness are found. These should follow the style of Bernie's 3 column document, where the rationale for a bulletin is recorded.

So this isn't a rant but is the background to recommend that your email be followed up with a Bulletin.

Ian

Ian Keith DVM
Field Operations Veterinarian - Pacific Region
Fisheries and Oceans Canada | Pêches et Océans Canada
Fisheries Management
Aquaculture Management Division | Gestion de l'aquaculture
Aquaculture Environmental Operations - Fish Health
#103 - 2435 Mansfield Drive
Courtenay, British Columbia V9N 2M2
Telephone | Téléphone: 250-703-0917
Mobile | Portable: [REDACTED]
Fax | Télécopieur: 250-703-0921
Ian.Keith@dfp-mpo.gc.ca

s.16(2)(c)

s.19(1)

From: Sandberg, Krista
Sent: Tuesday, October 10, 2017 8:08 AM
To: Waddington, Zac
Cc: Keith, Ian; Manchester, Howie
Subject: RE: August sea lice report ready for review

Thanks, Zac. I will send this one off for approval from Adrienne.

Just a side note on Slice notifications. As you've probably seen, we've recently discovered that industry is not required to give a 72 hour notification for Slice deposit under the AAR. [REDACTED] asked me if we wanted this notification to come under section 4 of the CoL, and so I spoke to Ian about it on Friday. We currently get deposit details in the quarterly Mortality by Category reports, and we SHOULD get treatment plans in the monthly Sea Lice reports as well, though this isn't always the case. Some companies are better at communicating their plans in the sea lice reports than others are. Ian is fine with this, and so am I (I hope you are too).

I've got an email from [REDACTED] to myself and industry representatives asking what we are expecting in terms of Slice treatment notifications. I'm thinking of drafting up a response that basically says separate notification isn't necessary as sea lice threshold exceedance or proactive treatment is not considered to be a "fish health event" as is specified in