

Waddington, Zac

From: Waddington, Zac
Sent: May-18-18 9:30 AM
To: Jensen, Neil; Doucette, Claire
Cc: Walde, Kirsty; Knight, Joe; Manore, Chris; Paylor, Adrienne
Subject: RE: Clayoquot sea lice graphs

Thanks very much for looking into this. I was not yet working for DFO in the spring of 2017 with the Esperanza lice issue, but from my understanding, this situation is different, [REDACTED]

[REDACTED] We have graphed the absolute sea lice inventory on farms over threshold, and found that the management plan submitted by Cermaq (harvesting), did not meet the criteria of reducing absolute sea lice inventory in the month of March, and graphs for the month of April are pending. I shared the graphs with Claire and can redistribute if necessary (or you can also just speak to Krista S. directly).

All that said, I recognize and agree that our COL are very weak in many areas, and would support opening the licence to change and strengthen our conditions to make them enforceable. In the interim, I was just hoping that this situation in Clayoquot could be reviewed [REDACTED] Unlike the previous situation in Esperanza, here we have documentation demonstrating the failure of their plan to reduce absolute sea lice inventory as per a condition of licence.

Zac

From: Jensen, Neil
Sent: May-17-18 9:05 AM
To: Doucette, Claire; Waddington, Zac
Cc: Walde, Kirsty; Knight, Joe; Manore, Chris
Subject: RE: Clayoquot sea lice graphs

Hi Claire and Zac,

C&P staff looked at this COL in the past and recommended a change as it was not viewed as enforceable. As I understand it, despite the recommendation, no changes were made to the COL and the current wording became fixed for the duration of the licence. A major limitation of the multi-year licences is that COLs may not be amended except for "the purposes of the conservation and protection of fish" (Fishery (General) Regulations, sec. 22(2)). This issue came up last year with an issue of large numbers of sea lice at Grieg on the West coast of Vancouver Island and C&P was asked investigate. However, the only thing that the company can be compelled or held legally accountable for is "implementing a plan" – whatever that means. There is no measure or quantifiable action that we can determine happened or not (i.e. within a prescribed time period). As long as the company has a plan and implements it, they are in compliance of the COL. For example, if they discovered the sea lice and ordered up hydrogen peroxide treatments and a well boat, but it will take 6 months to get in place in order to reduce the number of sea lice, they would be compliant. [REDACTED]

The only avenue that I can recommend is that you try to convince Allison [REDACTED] that the COL needs to be changed for conservation and protection reasons (for wild fish). They may have considered this last year, but I wasn't involved in

s.21(1)(b)