

[REDACTED]

Thank you for the 25 September call with the explanation for the mortality with the transfer from Concepcion and the bioassay results from Atrevida.

Thanks too for sharing your comments on sea lice management in Nootka. This letter is my response to your proposal.

You said that you plan to “peroxide all Nootka.” We knew that you would be using peroxide at Gore, as well as freshwater and the Hydrolyser® as these were the sea lice management modalities described during the call with [REDACTED] others (conference call September 7) and were key to your argument for the transfer permit.

In Ms Calla’s follow-up letter to the call (September 8, DFO file 2017-502-00189) Health Management SOPs were requested prior to the ITC licence submission [REDACTED] said they would be submitted October 15. This letter pertains to the SOPs for lice management as described [REDACTED] during the meeting. [REDACTED] explained how the circular cages would have a dividing net and the treated fish would enter the same cage that they came from but separated from the untreated by the net. This was specifically for answering questions about peroxide treatment. [REDACTED] didn’t go into much detail about the Hydrolyser®-equipped barge as the mechanical sea lice management tool but it was implied that it too would use the divided cage. He explained the limitations of your leased well boat for freshwater treatment but described options baths. So the basics of the SOPs were given during the meeting and Ms Calla’s letter and this letter are reminding you of expectations for the October 15 submission.

All from DFO on the September 7 conference call were aware of the SLICE® resistance at Esperanza/Steamer in September 2016 and Ms Calla, if not all, was aware of the dramatically high EC<sub>50</sub> compared with data from other areas within the fish health zone. DFO is also aware of repeated failed response to SLICE in Nootka, confirmed by the Grieg veterinarian in Spring 2015 and apparent from the submitted data in 2016. We have data back to 2008 on failure of lice management by SLICE in the area and bioassays have failed to predict SLICE® performance (reference to Steamer bioassay 2014). Ms Calla is aware that SLICE® has a drug identifier number (DIN) and so prescription for its use is in the prevue of the veterinarian. It is therefore in the prevue of the DFO regulatory veterinarian to not permit use of emamectin benzoate in Esperanza Inlet or Muchalat Channel until further notice, based on the literature, the history of low if any efficacy in Esperanza inlet and Muchalat Channel, and absence of Grieg research to challenge this interpretation of the data.

I look forward to your revised Health Management SOP October 15.

Regards,

Ian

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