

Why legislating all aquaculture under Bill C-228 is a bad idea.

Before we do anything else, let us state we have nothing against Fin Donnelly. We have never met the man, but he appears passionate and dedicated to his ideas. We have spoken with his office and we have had respectful discussions about Bill C-228, and land based salmon aquaculture. Our analysis is strictly on the merits of the proposed Bill C-228. While Fin's idea might be noble, we believe Bill C-228 will actually hurt wild salmon, and Canada. We are very concerned and ask for your time to consider our points.

My company, Willowfield Enterprises Ltd., has over 30 years experience in global food production and distribution. We have worked with governments, farmers, fishermen, scientists, and multinational corporations in all areas of the world, to produce and deliver the food that you eat. From produce, to poultry, to pink salmon, we have global experience in all segments of the food industry. Along with that, we are the only company in the world that supplies both Coho and Sockeye salmon from land-based, closed containment aquaculture, (as West Creek Aquaculture). We bring a unique and expert perspective to this subject, and in our opinion of Bill C-228.

Bill C-228 is an attempt to make it illegal for fin fish (salmon, trout, halibut, steelhead, sturgeon, sablefish, arctic char, cod, perch, etc), to be grown anywhere but in contained solid wall facilities, ie on land, *"No licence shall be issued under this Act for finfish aquaculture unless it is carried out in a closed containment facility."* Along with this, Bill C-228 also legislates that taxpayers should compensate the fin fish aquaculture industry, for any losses of employment or business. *"... the Minister of Fisheries and Oceans must prepare, table in Parliament and implement a plan for transition to the use of closed containment facilities setting out, among other things, specific support measures for corporations and workers in the finfish aquaculture sector affected by this transition in order to protect the jobs and financial security of those workers, including training and income support through the employment insurance system."*

Bill C-228 asks legal authority to force Canadian, and only Canadian aquaculture farms out of the open water, and on to land into contained facilities. Land based fin fish costs approximately 100% more to produce than open water fin fish. Land acquisition, building construction, equipment, and energy costs are permanent factors that will always equate to land based being more expensive than open water. Land based aquaculture results in fish costing approximately twice as much as grown in open water.

Bill C-228 suggests new Canadian land based aquaculture farms will replace the open water aquaculture industry, but this is just plain false. In our competitive global environment, it is naive to suggest a consumer in Miami or Singapore is going to pay 100% more for Canadian land based fish over Scottish or American open water grown or wild fish? They don't know or probably care if its farmed, and they

certainly don't worry about it being land based aquaculture. They simply want their fish dinner at the least expensive price. Many might look down their nose at this consumer saying it's irresponsible, but there are two bananas in the counter that look the same, and one is twice the price of the other, which one are you choosing? How about when gas is cheaper at the station down the block? Do you ask about the source of oil before filling up? Of course not. Bill C-228 is based on the premise consumers are not going to behave like consumers, which is a huge oversight.

Let's assume Bill C-228 passes, what happens next? From a supply perspective Canada would stop producing 119,000,000kgs of salmon, 5,000,000kgs of trout (and many other species), that helps fill yearly global demand and expectations. With Canada's share not being produced, where will the fish come from that global consumers expect to purchase and eat? Other open water producers cannot simply produce more fish right away. They need government approval, infrastructure, brood-stock, and a minimum 2 years to grow the fish. Bill C-228 suggests Canadian land based will fill the shortfall, but we have already shown how land based is not competitive with global open water aquaculture, let alone the consideration it is not yet scientifically feasible to produce large volumes on land. It is very important to ask where will the fish come from to make up the shortfall in supply? There will be a significant shortage on the market and prices will skyrocket.

What fish resources are quickly available to be harvested and supply global consumers the fish they expect to eat? Have you guessed it? It's wild fish of course! Any time you make less of a desired commodity, the demand increases. Higher prices drive greater efforts of illegal and unreported fishing to fill the demand. More foreign vessels delve into international waters to target wild fish chasing the easy sell and large profits. People talk about "Canadian" salmon, but fish don't respect borders, and neither do many fishing countries. It would only take four short years for wild salmon runs to be poached and harvested to virtual extinction during the worldwide shortage of farmed salmon, due to Bill C-228 being enacted. Bill C-228 doesn't reduce pressure on wild salmon but increases it, catastrophically.

We all know Bill C-228 is targeting salmon farms. I am confident Fin Donnelly understands Bill C-228 will kill the open ocean farmed salmon industry in Canada altogether. No open water aquaculture company is going to transfer to land, they are simply going to move production to another country. While some might be happy with that future, consider what would happen with wild salmon stocks as a result. Also consider what would happen to Canada, and its economy? Many activists don't get concerned with Canadian's losing their jobs but unemployment also brings social and health costs to people and families. Just ask anyone who was or is unemployed.

With open water aquaculture leaving, Canada would lose 10,000 direct and hundreds of thousands of indirect jobs. Remote communities, including First Nations, would be devastated. A bleak future would bring further negative effects to remote communities and their families. Wild salmon stocks would be illegally

harvested to extinction levels, and there would be no land-based industry. Wild salmon fishermen would have even less salmon to target and the industry would also collapse.

However, fear not fellow taxpayers, the politicians' Bill C-228 generously suggests that we compensate all industries who suffer as a result of it becoming law. There is no maximum dollar levels or time limitations, just an open ended statement so we can't see what Bill C-228 might truly cost.

Bill C-228 is supposedly in the interest of “saving wild salmon”, but this message is inaccurate. We feel that any discussion about saving wild salmon must include a discussion of reducing wild salmon harvest and consumption. Human consumption is the largest and greatest threat to wild salmon by a country mile. Hundreds of millions of wild salmon are killed each year for our dinner plates. If we did not kill wild salmon their numbers would skyrocket, almost overnight, ocean farmed salmon or not. Almost all activists fighting farmed salmon are doing so to support wild salmon harvest and consumption. We don't recall hearing any activist group or politician suggesting consumption should be reduced, yet they say they want to save wild salmon? Their message is not transparent. It should read we want to save wild salmon . . . so we can eat them.

Bill C-228 ignores that consumers behave like consumers, the nuances of supply and demand, the greed of illegal fishing, and the largest single reason for wild salmon deaths, human consumption. Bill C-228 is a very poor and unrealistic idea that will not help wild salmon but hurt them, as well as much of Canada. We urge you to consider all factors and ideas, not just the easy one's that help develop votes, before offering your support.

Sincerely,
Don Read
President
Willowfield Enterprises Ltd