

Chair, Law Amendments Committee:

I am away from the province and unable to ask to come before you in person. However I have been following closely the government's response to the recommendations of the Doelle-Lahey panel on aquaculture regulatory reform, and appreciate this opportunity to address you by email.

I recommend that Bill 95 be sent back for extensive reworking. It addresses only a few of the panel's recommendations. The panel's report stated that, if its recommendations were not fully accepted and implemented, then they would recommend continuation of the moratorium on open-net pen licenses.

In addition to the need to fill out the bill to make it complete, there are two particular things in it that are in violation of the panel's recommendations. The first is that veterinary medical records associated with fish farms will not be available to the public. This directly conflicts with the need for openness and transparency that is basic to the panel's recommendations.

The second thing that conflicts with the panel report is the fact that the government is willing to have existing fish farm licenses left in place without the proper scientific review that is called for. Many of these sites would be found very unsuitable for repopulation due to inadequate water depth or flushing, and would be anoxic. They must come under the same assessment process as a new site.

Thank you,  
Graham Smith

