



13 November 2007

Dear Mr. Brannen,

Thank you for forwarding the "Draft Goals and Objectives" and the "Draft Principles" for the WWF Mollusc Aquaculture Dialogue. The Association for Responsible Shellfish Farming in British Columbia is certainly in favor of developing and implementing performance-based measurable standards that will minimize the negative effects of mollusc aquaculture and permit the industry to remain economically viable. However, from our past experience with the industry, we have severe reservations about many of the principles and phrases enumerated in the draft documents which seem to be word for word phrases copied from some of the worst offenders in the industry. We find the "principles" heavily slanted toward industry concerns, and we are concerned that the proposed steering committee will be dominated by industry personnel.

In more specific terms, the goal: to "Continue to promote the beneficial environmental and social aspects of shellfish cultivation" assumes that this has been the goal of the WWF and the dialogue group and it implies that this is a normal state of affairs. While small operations do have environmental and social benefits, some large industrial operations typically create the most serious environmental and social problems. We suggest dropping this sentence entirely from the "Goals." It seems to imply and assume that shellfish aquaculture is automatically beneficial.

The "Principles" focus almost entirely on problems that the industry has run into such as genetics, disease & pest management, and farm maintenance. There is only passing mention of "multi-user cooperation" implemented by "good neighbor," "socially responsible," and "conscientious coastal citizen" policies. These are all terms that some people in the industry have used over the years to ride roughshod over local residents and concerns. Some of the large operations in the industry have chronically invoked these principles while completely ignoring any semblance of implementation. The Association members find the inclusion of these terms under "principles" as offensive. We would like to see more equitable and honest principles. For instance, there is no mention in the principles of "conflicts" or conflict resolution, yet this is at the center of the most important social and economic issues. There is no mention in the "issues" of pollution; there is no mention of adverse effects of high densities of mollusc farms or cumulative effects on marine environments; there is no mention of establishing siting criteria or the development of testing for shellfish containing toxins such as cadmium.

Of greatest concern is the proposed steering committee to formulate proposals for standards. How many people will be on this steering committee? How will they be selected? How will it be funded? How can we be assured that it will not be dominated by industry personnel and simply whitewash the current unacceptable practices? Industry, especially

with government support, can afford to subsidize individuals for their time, expenses, and travel to participate in such committee work. Scientists and representatives from community interest groups must fund participation out of their own pockets or find alternative sources of support (as well as the necessary time). This situation does not bode well for an equitable representation of interests.

In sum, we would like to see major changes to these draft documents to reassure the public that this is simply not a promotion gimmick for the major operators in the shellfish industry.

Sincerely yours, on behalf of the Association for Responsible Shellfish Farming,

Dr. Brian Hayden, President