



Collaborative Campaigning for Food Sovereignty and Environmental Justice

Hon. Leona Aglukkaq  
Minister of the Environment  
CC.

Hon. Gail Shea, Minister of Fisheries and Oceans;  
Hon. Janice Sherry, Environment, Labour and Justice and Attorney General,  
Government of Prince Edward Island;  
Megan Leslie, NDP Environment Critic;  
Hon. John McKay, Liberal Environment Critic;  
André Bellavance, Bloc Québécois;  
Elizabeth May, Green Party.

November 21, 2013

**RE: GE Fish Environmental Safety Concerns Panama-PEI**

Dear Minister Aglukkaq,

We are writing to apprise you of important developments in Panama that are directly relevant to the current operations of the company AquaBounty in Prince Edward Island and Environment Canada's review of the company's genetically engineered (GE, also called genetically modified) Atlantic salmon. We are also asking you to take actions to safeguard aquatic ecosystems in Canada from the risks posed by GE salmon, and to safeguard ecosystems internationally from risks originating in Canada.

The US company AquaBounty maintains a research facility at Bay Fortune, PEI, where it conducts research into GE Atlantic salmon, including maintaining a brood stock and producing GE salmon eggs for export to Panama for further research and development. Because neither AquaBounty nor Environment Canada will confirm the status of any review, we do not know if the department is currently evaluating a request from AquaBounty to commercially produce GE salmon eggs in Prince Edward Island, or produce GE salmon at one or more locations in Canada (Please refer to our letter of November 14, 2013 requesting an answer to the question: Is Environment Canada currently assessing a request to approve the genetically engineered (GE, also called genetically modified) Atlantic salmon called "AquAdvantage", either for commercial production of fish eggs and/or for growing out of the fish?).

Today, the Environmental Advocacy Center of Panama (Centro de Incidencia Ambiental de Panama or CIAM) submitted a complaint to the National Environmental Authority in Panama alleging that AquaBounty is in breach of environmental regulations in its research and development of GE Atlantic salmon in Panama. This is of great concern because this same company operates a research facility in PEI. In fact, all the GE fish eggs used in the Panama facility come from the facility in PEI.

CIAM has alleged AquaBounty's non-compliance with several national environmental regulations at its Panama location, as well as the failure of the Panamanian government to enforce compliance. The National Environmental Authority in Panama conducted an inspection of AquaBounty's operation in 2012 which found violations of environmental regulations, that apparently remain uncorrected by the company. We understand that the alleged violations include:

- Failure to submit monitoring reports to the government every three months as required, and despite repeated requests from the government.
- Failure to obtain permits for wastewater discharge, even as government analyses of surrounding waterways show elevated coliform levels.
- Failure to obtain permits for water use.
- No payment in ecological compensation for deforestation.
- No presentation of a Pathogen (disease) Control Plan, Epidemiological Surveillance Program, or Public Health Program.

CIAM is seeking AquaBounty's compliance with national and international environmental regulations.

The administrative filing submitted in Panama today raises new questions that need to be considered in any Canadian environmental assessment. The filing raises questions about the ability of the company to comply with environmental regulations as well as the ability of the Government in Panama to enforce national environmental regulations.

We are concerned that, as the complaint suggests, the company is ill-equipped to manage the many serious risks of research and development into GE fish, and that the company's current operation in PEI needs strong oversight from Environment Canada. If the company cannot comply with environmental regulations in Panama, what, if any, problems may exist at the PEI facility currently, or may occur if Environment Canada allows for commercial fish egg or GE fish production?

GE fish eggs from PEI may already be putting Panama's environment at risk. If compliance issues in Panama are not resolved satisfactorily and Environment Canada approves the commercial production of the GE salmon eggs in PEI, more eggs will be transported to Panama, resulting in an even greater risk potential to the environment in Panama.

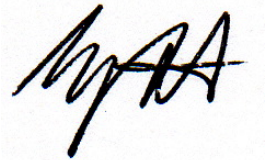
We ask you to:

1. Provide us with detailed information describing:
  - a) Environment Canada's oversight of AquaBounty's research operation in Prince Edward Island including monitoring and reporting,
  - b) Who has jurisdiction over the relevant environmental issues, including wastewater issues, at the current PEI facility,
  - c) Which regulations oversee the shipment of Living Modified Organisms from Canada to other countries.
2. Conduct an audit of the containment measures at AquaBounty's PEI operation including wastewater issues, with relevant provincial and local departments.
3. Assess the role that risk questions in Panama, and other nations, should play in Environment Canada's environmental assessment of GE fish egg/fish production.

4. Assess the relevance of a company's environmental safety track record, domestically or in other countries, to domestic environmental safety evaluations (to issue Significant New Activity Notices).
5. Halt the production and shipment of experimental GE fish eggs from PEI to Panama if regulatory compliance issues in Panama are not resolved satisfactorily.
6. Halt review of any request from AquaBounty for approval of commercial production of GE fish eggs and/or GE fish pending resolution of the complaint in Panama.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Sharratt', is written over a light grey rectangular background.

Lucy Sharratt  
Coordinator

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