Recommendations Regarding CSSP for SF-AMAC PRISC Response

As currently administered the Canadian Shellfish Sanitation Program (CSSP) is impeding the growth of shellfish aquaculture in BC. Originally developed to ensure the wholesomeness of wild captured shellfish, the program has not been updated and properly funded to provide for a dynamic and growing shellfish aquaculture industry. Indeed, our understanding is that the CSSP has not received a significant increase in funding in twenty years! As a result of this the CSSP would also appear to be an impediment to moving forward with other important federal initiatives like the Blue Economy Strategy and Indigenous Reconciliation.

Introductory Statement from the Pacific Region Interdepartmental Shellfish Committee (PRISC):

- Thank you for providing your suggestions in response to AMAC discussions. At this time, the PRISC is responsible for executing the requirements of the CSSP as written. That said, it is important to note that CSSP policy is currently being reviewed, in part to address increasing demands associated with an expanding shellfish harvesting industry in Canada. This review is being performed with the goal of improvement, including how we fund and deliver our services

Service to New Industry Entrants

The current level of CSSP funding allows ECCC, CFIA and DFO to provide growing water classification services only to the existing industry operating in long established growing areas. Funding is insufficient to allow ECCC, CFIA and DFO to offer growing water classification services to new entrants in more remote areas. These new entrants, the majority of which are Indigenous, are expected to pay for all associated growing water classification costs under an Alternative Service Delivery model.

Recommendations:

- Significantly increase the resources available to ECCC, CFIA and DFO to allow their programs to expand to include new growing waters in remote areas.

Response:

- CSSP partners continue to evaluate the best way to meet program objectives and balance delivery demands, while considering the various resourcing options, including alternate service delivery. With limited resources, the CSSP has prioritized areas that pose the greatest risk to consumers, while allowing for program expansion where possible.

Need to Explore Innovative Technology and Methods

Several new genetic and electronic technologies have been developed in recent years which offer the promise to improve service delivery and reduce cost of the CSSP. Adoption of these innovative technologies appear not to have been explored or adopted by CSSP delivery agencies in any significant way.

Recommendations:

- Consideration of new technology and processes should be explored for more cost-effective administration of the CSSP (e.g., drones for sample collection or environmental DNA for monitoring for harmful algae).

Response:

- The Government of Canada recognizes the rapid innovation in technological methods that might possibly assist in the execution of the CSSP. One such technological advance being explored is the development of test kits for biotoxin analysis.
- CSSP partners regularly identify research needs, participate in scientific research and review information about scientific developments, such as those listed above, that may benefit the program.
- The CSSP would welcome new technologies for consideration, but require time to evaluate and their effectiveness and efficiency. For example, at ECCC, drone use is being explored, and their potential use is being evaluated.
- If the AMAC has potential proposals for consideration, please feel free to forward the proposal to PRISC, and where appropriate, these proposals can be referred to the CSSP Research Needs working group.

Greater Focus on Growing Water Remediation

It appears that the CSSP program as currently administered devotes very little effort to remediate growing waters once declining water quality results in areas being closed. DFO, ECCC and CFIA have considerable statutory authority that presumably could be used to help remediate closed areas.

Recommendations:

- Use ECCC, CFIA and DFO's authority to force local governments and others with a more direct role in declining role declining water quality to act to remediate growing waters and obvious pollution sources (e.g., illegal float homes).

Response:

- It is important to note that the CSSP Partners (CFIA, ECCC, DFO) have neither the mandate, nor the authority to remediate growing waters and/or address pollution source issues. In Canada, the jurisdictional authorities implicated in water quality management and deposit into marine environments are complex, and typically shared between multiple jurisdictions.
- At a regional level, the CSSP partners regularly engage their network of provincial, municipal and local authorities and First Nations groups to share information.
- BC provincial authorities are invited to participate in the Pacific Region Interdepartmental Shellfish Committee bi-annual meetings where harvest area classification decisions are discussed.
- While the CSSP doesn't have the authority to remediated contaminated areas, it does play an active role by ensuring that only safe and wholesome shellfish are available to consumers.
- The legal authority for the CSSP is provided by the *Fisheries Act*, the *Management of Contaminated Fisheries Regulations*, the *Pacific Aquaculture Regulations*, the *Safe Food for Canadians Act* and the *Safe Food for Canadians Regulations*. These acts and regulations enable DFO, CFIA and ECCC to control the harvesting of shellfish, to control the interprovincial, import and export commerce of shellfish, and to assess the sanitary quality of shellfish harvest areas.

Apparent Discrepancies Between Administration of the CSSP and NSSP

Although the CSSP and the NSSP are supposed to be equivalent, a growing amount of anecdotal evidence suggests that shellfish farmers in the USA enjoy more flexibility when it comes to administration of NSSP than BC farmers do with the CSSP. For example, in contrast to in BC, US shellfish farmers appear to commonly operate in areas with significant residential development on the upland.. This suggests that either the programs are administered differently, or the US does a much better job of pollution prevention than BC does. It would be very useful to determine why these differences exist. DFO could investigate these differences when next auditing the NSSP program of the USA.

As well, in the USA officials at the state level act as advocates in under the NSSP to protect industry and state interests when weighing risk to public safety with industry impacts. There appears to be no agency in BC with an equivalent mandate. BC MAFF could perhaps file such a role if it regularly participated in PRISC.

Recommendations:

- DFO should explore differences in administration between the NSSP and CSSP during the next audit of the NSSP to see how and why these apparent differences exist.
- BC MAFF should be encouraged to attend PRISC and take on the role of industry advocate like that of state officials in the USA.

Response:

- The structure of the Canadian and American Shellfish Sanitation Programs are different, with equivalent health outcomes.
- As outlined in the CSSP Manual of Operations, “Relevant provincial authorities and industry representatives may participate as observers to provide relevant perspectives on shellfish sanitation matters”. BC provincial authorities such as the BC Ministry of Agriculture, the BC Centre for Disease Control and the BC Ministry of Environment are regularly invited to participate in the Pacific Region Interdepartmental Shellfish Committee bi-annual meetings
- The CSSP partners also are responsible for auditing shellfish producing countries with whom Canada has shellfish agreements. Led by CFIA, these audits examine the relevant design and delivery of the foreign country’s programs. As an example, the last audit of the National Shellfish Sanitation Program was in September 2018. Results of this audit are available on the CFIA website.