

Society
of Canadian
Limnologists



Société
canadienne de
Limnologie

The Honorable Keith Ashfield
Minister, Department of Fisheries and Oceans
House of Commons
Ottawa, Ontario
K1A 0A6

June 5, 2012

Dear Minister Ashfield,

I write in my capacity as the President of the Society of Canadian Limnologists, which represents aquatic scientists across Canada. The concerns expressed within this letter are made on behalf of the Society, as represented by its Executive.

Specifically, we are concerned about your department's decision to cease operation and staffing of the Experimental Lakes Area. As evidenced by the reaction to your department's decision announced to DFO staff on May 17th, 2012, the aquatic science community of Canada is dismayed at your department's abandoning of an internationally recognized research facility that has, over the years, provided much of the aquatic science knowledge that underlies environmental policy and legislation not only in Canada, but indeed worldwide.

The research underway at the Experimental Lakes Area is national in scope, and has played a crucial role in developing evidence-based environmental policy, regulation and legislation, including regulations to control acid rain and phosphorus on the Great Lakes. On-going research evaluates the ecological benefits versus significant financial costs of nitrogen removal from municipal wastewater, demonstrating that millions of dollars could be saved annually by controlling phosphorus alone, and that additional nitrogen removal produces little added ecological benefit. Long-term datasets from monitoring at ELA are being used by researchers across the country and around the world to investigate how climate change will affect Canada's aquatic resources, research with enormous implications to everything from agricultural productivity in the Canadian prairies to Gulf of Saint Lawrence commercial fisheries.

You have asserted that the research conducted at the Experimental Lakes Area no longer fits within the core mandate of the Department of Fisheries and Oceans. This is palpable nonsense. Even if one cleaves to the curious view most recently expressed in the proposed amendments to the Fisheries Act – that the only fish species of concern are those of commercial, recreational and aboriginal importance – research at the ELA provides the scientific evidence required to manage commercial and recreational fisheries effectively and efficiently. For example, research conducted at ELA has demonstrated that low-level nutrient additions consistently result in increased productivity of lake whitefish, one of the most valuable commercial species in Canada (Freshwater Fish Marketing Corporation statistics, Great Lakes Fisheries Commission statistics). Research at ELA showed that acidification caused significantly reduced lake trout populations, one of Canada's most important recreational fisheries species. Other projects have shown conclusively that lakes will respond quickly to reductions in mercury emissions, reducing mercury levels in fish below those that impose significant health risks to particular sectors of Canadian society (especially aboriginal and First Nations communities), but which also result in substantial economic losses from both commercial and recreational fisheries due to mercury consumption guidelines and advisories. The evidence is overwhelming that, despite assertions to the contrary, ELA provides research not only relevant to, but critical for DFO to achieve its (revised) core mandate and associated objectives. Indeed, we would go further: in our view, your department's intention to close ELA sends a strong signal to the Canadian public that its interest in evidence-based, management of Canada's aquatic resources is non-existent. The implication, of course, is that your department is largely uninterested in fiduciary responsibility or accountability even for its (revised) core mandate.

You have stated that your government is engaged in a dedicated and well-intentioned attempt to find an alternate operator for the facility. But even if successful, the proposed timeline of March 31, 2013 is woefully inadequate to realistically negotiate such a transfer without an interruption of experiments currently underway. More worryingly, the likelihood of finding such an alternate operator is low. You have suggested that a Canadian university might step in, but this possibility, even if realized, is unlikely to maintain ELA's national focus on water quality and fisheries issues of importance to Canadians. Moreover, your government's recent cuts to research programs that could enable the operation and maintenance of such a facility (such as, for example, NSERC's Major Resources Support Program) reduce the likelihood of any university adopting the facility to near zero. And if an alternate operator cannot be found by the anointed date, your department has indicated that the Experimental Lakes Area will close. The inescapable conclusion is that your government has no real interest in transferring the site to an alternate operator, assertions to the contrary notwithstanding.

We would also point out that under the Canada-Ontario Memorandum of Agreement for the Experimental Lakes Area, (Section VII, 3) the government of Canada is "responsible to remediate the lakes, watersheds, stream segments, and lands used for experiments, and the ELA field station, to standards as specified by the Ontario Ministry of Natural Resources and the Ontario Ministry of Environment." If the ELA closes, the Government of Canada is liable for the full costs of restoring the systems to their original state. The costs of so doing,

and the need for DFO to demonstrate the conditions under the agreement are met, means that your department will continue to pay for the facility long after it closes. We ask specifically what these costs will be, and whether these costs have indeed been incorporated in a “full cost” accounting of the decision to close ELA.

In closing, we are of the view that this decision on the part of your government is a poor one, and we urge you to reconsider it. In particular, we request that you provide answers to the following questions:

- (1) On what basis has your department determined that the research conducted at ELA falls outside, or is irrelevant to, the core mandate of DFO, either the current or contemplated revised version thereof? What evidence have you considered in reaching this conclusion?
- (2) Has your department conducted a full-cost accounting of its liabilities under the agreement with the Province of Ontario? If so, please forward a copy of this accounting. If not, why not?

Sincerely,

A handwritten signature in black ink, appearing to read 'Jules Blais', with a stylized flourish at the end.

Jules Blais, President
Society of Canadian Limnologists
Professor of Biology, University of Ottawa