



SEP 08 2005

Votre référence - Your file

Notre référence - Our file

**A-2005-00107 / lc**

Mr. John Cummins  
Member of Parliament  
Delta-Richmond East  
Room 548, Confederation Building  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Mr. Cummins:

This letter is in response to your request under the *Access to Information Act* for:

***"...Copy of all documents at the Pacific Region's HQ in Vancouver prepared May 1 to June 15 involving Malachite Green."***

Attached please find the complete release package in response to this request. The exemption provisions s. 14, 19(1), 20(1)(b), 21(1)(a), 21(1)(b) of the Act have been applied to the package. A copy of the relevant sections is attached.

The *Access to Information Act* grants you the right to file a complaint with the Information Commissioner if you are not satisfied with our handling of your request. The address is:

Office of the Information Commissioner  
112 Kent Street, 22<sup>nd</sup> Floor  
Place de Ville, Tower B  
Ottawa, Ontario  
K1A 1H3

If you have any questions regarding this request, do not hesitate to contact Lina Canonico, at (613) 990-9015.

Yours sincerely,

  
Gary Lacey  
Director/Coordinator  
Access to Information and Privacy

Attach.: pages 1-9, 13-18, 21-26, 29-34, 37-41, 43-45, 50-66, 68-75, 78-84, 89-104, 111-119, 121-122, 124-125, 130-131

**From:** Pearce, Brian  
**Sent:** March 29, 2005 3:58 PM  
**To:** XPAC OHEB CAs; XPAC OHEB Hat All Mgrs  
**Cc:** XPAC OHEB Area Chiefs; XPAC OHEB Bios; Anderson, Brian; Lofthouse, Doug; MacKinlay, Don; Kieser, Dorothee; 'Mark Sheppard'; Webb, Allison  
**Subject:** Malachite Green and other chemical and drug usage in fish culture

Attached for your information is a letter recently sent out to the aquaculture industry by MAFF regarding the use of Malachite Green (.doc). I have also attached a copy of a somewhat dated letter sent out to all SEP staff and clients in 1992 outlining the SEP policy on drug and chemical usage (.pdf). I am forwarding these letters as a reminder that the use of Malachite Green is prohibited and more importantly that it is DFO policy that all SEP sponsored programs comply with all Federal and Provincial legislation and regulations regarding the use of drugs and chemicals on fish, fish eggs and fish products and in our and our clients facilities. The policy letter, although somewhat dated, clearly outlines the policy for projects to work through the fish pathology program (FPP) at PBS (Dorothee Kieser and staff) in regards to the purchase and use of drugs and chemicals.

A significant change since 1992, that all should be aware of, is the need to acquire a prescription from a licensed veterinarian for the use of all veterinary drugs. Until such time as we have a vet on staff the services of Dr. Mark Sheppard have been secured for this purpose. Mark's services can be arranged through the FPP. At this point in time, we plan to have a veterinarian on staff sometime this spring.

A further recent significant change is that the Health Protection Branch of Health Canada now considers Ovadine to be a drug rather than a sanitizer and it can no longer be sold in Canada for egg disinfection until it receives a Notice of Compliance. For continued use of Ovadine as an egg disinfectant, we have made arrangements through Dr. Mark Shepherd for an Emergency Drug Release (EDR) for specific groups of facilities for specific Ovadine use. All facilities that need to acquire Ovadine for egg disinfection should be on a list that was compiled in November 2004. When individual requests for Ovadine are made, Mark verifies that the hatchery is on the EDR list and then fills in the Ovadine volume amount and hatchery name, signs it and faxes it to the hatchery to fill in the shipping information and then to order the Ovadine from either Syndel or Dynamic. A copy of the Ovadine release .doc is also attached for your information. A usage record form is also required and Mark provides this when the request is made. If your facility or one of your clients requires Ovadine for egg disinfection and you have not identified the need previously, you should contact Mark Sheppard and he will add you to the EDR.

I will be reviewing the attached use policy with Dorothee and our vet when he/she is hired and issuing revised direction if warranted. In the mean time, if you have any questions or concerns please forward them to me or give me a call.

<< File: Malachite Green Information Letter v1.doc >> << File: drug and chemical use.pdf >> << File: Ovadine Release letter.doc >>

Brian Pearce

Chief, Enhancement Support and Assessment / Chef, Soutien et évaluation de la mise en valeur  
Oceans, Habitat and Enhancement Branch / Direction des Océans, de l'habitat et de la mise en valeur  
Department of Fisheries and Oceans / Pêches et Océans Canada  
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BCP



Government of Canada / Gouvernement du Canada

MEMORANDUM

NOTE DE SERVICE

To / À

Distribution

From / De

Director, Salmonid Enhancement Program

Security Classification - Classification de sécurité
<b>Unclassified</b>
Our File - Notre référence
Your File - Votre référence
Date
<b>September 4, 1992</b>

Subject / Objet

**SEP POLICY ON USE OF DRUGS AND CHEMICALS ON FISH**

In response to correspondence and discussions, and to avoid any misunderstandings or misinterpretations, I am hereby advising all SEP staff and associates of SEP Policy on the use of drugs and other chemicals on fish, including eggs and alevins, in facilities run by or under contract to the Salmonid Enhancement Program. The use of all chemicals, including drugs, used on fish (anaesthetics, chemotherapeutics, fungicides, disinfectants, vaccines, fish food additives, growth stimulants, etc.) must be in compliance with the Food and Drugs Act, administered by Health and Welfare Canada and the Pest Control Products Act, administered by Agriculture Canada.

The following guidelines apply both to new purchases and to drugs and chemicals on hand.

**1. Purchase of Drugs and Chemicals**

Purchases of drugs or chemicals for use on fish, unless exempted below, must be cleared by the Fish Pathology Program (FPP), currently Gary Hoskins or Dorothee Kieser, at the Pacific Biological Station. I assume that FPP will maintain a record of authorizations. The services of licensed veterinarians may be required and the service and prescription costs will be borne by the facility or project.

**2. Use of Treated Fish**

Adult fish which have been treated with any substance other than carbon dioxide or sodium chloride are not to be used for human or pet food. Treated carcasses should, where practical, be buried on federal land as per current practice. Where this is not practical, a waste management disposal permit should be obtained from provincial authorities.

### 3. Use of Drugs and Chemicals

The disposal of prohibited materials currently on hand shall be organized through the Pacific Biological Station.

#### **A. Malachite Green**

All further use of Malachite Green is prohibited. I reemphasize that this includes use of material on hand.

#### **B. Vaccines**

All vaccines used must be licensed by Agriculture Canada.

#### **C. Antibiotics**

Oxytetracycline (OTC) and Romet-30 in certain formulations have been approved by Health and Welfare for use on fish only for the treatment of furunculosis. Off Label Use (OLU) permits from the Bureau of Veterinary Drugs may be obtained for treatment of other bacterial diseases. All uses of these antibiotics must be cleared through FPP.

#### **D. Disinfectants**

The purchase and use of disinfectants for use on fish and equipment does not require prior approval from FPP. However, the products used must be labelled for specific use as disinfectants by the manufacturer and used in compliance with the Pest Products Control Act. Surface disinfection of salmonid eggs with iodophores may be carried out where that use of the product is specified on the label by the manufacturer.

#### **E. Formaldehyde (Formalin)**

Under certain circumstances and with special permission from the FPP, formaldehyde may be allowed for treatment of external parasites on fish. Its use in the collection and preservation of specimens for analysis and research is unrestricted at this time.

#### **F. Hormones and Food Additives**

The use of hormones and of additives to fish food after its manufacture is prohibited.

#### **G. Anaesthetics**

Under certain circumstances and with special permission from the FPP, MS-222 (TMS) and Marinil may be permitted for use on fish less than one year of age. Use of carbon dioxide is not restricted.

#### H. Other chemicals

Chemicals such as Chloramine-T that are to be used on fish must be acquired with permission from FPP and used as directed. Oxygen, sodium chloride, sodium bicarbonate and carbon dioxide are not restricted as to purchase and use on fish.

It is essential that all staff remember that all drugs and other chemicals must be properly labelled, handled and stored according to WHMIS guidelines and used as directed. Use of all drugs and other chemicals should be kept to the bare minimum necessary for proper operation and every effort should be made to reduce their use whenever possible.

To ensure that we are complying with regional health and safety rules I ask SEP Division Chiefs to review WHMIS awareness and procedures in their divisions and to report their findings to me by October 16, 1992.

I am aware of the impact that these restrictions will have on our ability to meet fish production goals at some facilities. To address your concerns I am initiating a two-pronged approach. The first is to brief the Deputy Minister and other senior departmental managers on the extent of the production and financial impacts and to initiate high-level discussions with Health and Welfare Canada and Agriculture Canada on obtaining approval of those substances necessary to SEP operations. The second is to initiate directed studies within SEP towards finding acceptable alternatives to those, such as Malachite Green, not likely to be approved for use on fish because of health risks or other concerns.

The Food and Drugs Act and the Pest Control Products Act affect not only SEP facilities but also all federal, provincial and private fish culture operations across Canada.

I have asked Keith Sandercock to coordinate SEP response to this issue. Please contact him if you need any further information.



D. Griggs

Distribution: F.K. Sandercock  
SEP Division Chiefs  
All SEP Biologists  
SEOs  
Community Advisors

cc. G. Hoskins  
J. Boutillier