

361 East Kings Road
North Vancouver BC
CANADA, V7N 1H8
21 May 2009

Dr. David Suzuki, Founder
The David Suzuki Foundation
Suite 219, 2211 West 4th Avenue
Vancouver, BC, V6K 4S2

Dr. Suzuki,

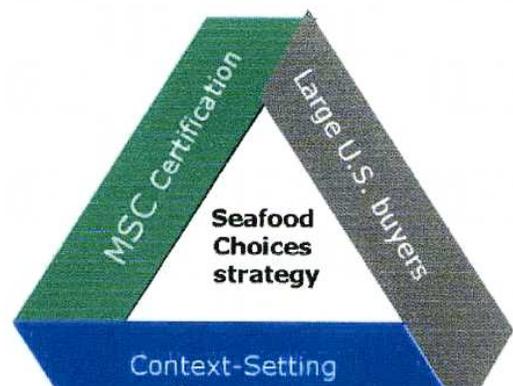
RE: PCBs in Farmed Salmon and Sea Lice Research Findings

Further to my previous letters, this letter reiterates my concerns and opinions and asks questions about the information that you provide to the public regarding salmon aquaculture, and specifically, with regards to contaminants in farmed salmon, and sea lice. As before, I write as a concerned member of the public. This is an open letter.

As I have referenced in previous letters, you claim that farmed salmon is high in PCBs and should be avoided, especially by women of child bearing age and young children.^{1,2,3,4} You also claim that your research shows that sea lice originating from salmon farms are causing high levels of mortality among juvenile salmon in the wild and putting their populations at risk of extinction.^{5,6,7,8,9} For the reasons that I outlined in my letter of 14 May 2009, I believe that both of these claims are unsubstantiated and mistaken. I have, therefore, appealed to you to retract these claims and set the record straight.

Here are the facts, observations and opinions upon which I base my questions:

1. According to U.S. tax returns and information from the U.S. Center for Consumer Freedom (attached), the David Suzuki Foundation has received at least **\$US10.3 million** from American foundations.¹ These American foundations provide substantial funding to organizations involved in the promotion and marketing of Alaskan 'wild' salmon. For example, since 1999, the David and Lucille Packard Foundation implements a program for **Market Intervention Tools** as part of its program for Marine Fisheries.¹⁰ This program includes the Seafood Choices strategy. As shown in the Packard foundation's own diagram (see right), the Seafood Choices strategy consists of 1) Certification by the Marine Stewardship Council (MSC), 2) Large U.S. Buyers, and 3) "Context Setting."
2. The Packard foundation defines sustainable seafood as seafood that is MSC-certified. As of August 2007, about 83 per cent of the total global volume of MSC-certified seafood was Alaskan. In the U.S. market, more than half of all MSC-certified products are Alaskan salmon. It follows that promoting "sustainable seafood," as defined by the Packard foundation, is promoting Alaskan seafood, especially salmon.



Source: The David and Lucille Packard Foundation

¹ This does not include American funds granted indirectly through Tides Canada Foundation. The Packard and the Moore foundations have granted at least \$14.1 million and \$5.5 million, respectively, to Tides Canada Foundation.

3. According to my observations and preliminary calculations (attached):
 - Since 2000, the Packard foundation has granted at least \$58.6 million to impact seafood markets and aquaculture, including \$18.5 million for MSC-certification, \$9.2 million for Seafood Choices and the sustainable seafood movement which implements Seafood Choices, and \$5.7 million for work with Wal-Mart and its suppliers. More funds were granted for Seafood Choices than for any of *SeaWeb*'s other programs.
 - According to U.S. tax returns, the Packard foundation has granted at least \$1,162,100 to the David Suzuki Foundation, including \$762,600 for the Pacific Salmon Forests program which produced your brochure, "*Why You Shouldn't Eat Farmed Salmon*."¹¹ This brochure promotes 'wild' salmon, most of which is Alaskan. I would find it hard to believe that the Packard foundation funded the program which produced this brochure but that it is not a "market intervention tool" to sway consumers towards Alaskan salmon.
 - In addition to the \$1,162,100, the Packard foundation provided funds to the David Suzuki Foundation through Tides Canada Foundation. The Packard foundation funded State-Of-the Catch and the so-called Canada's Seafood Guide.^{12,13} Both reports advise the public to not eat farmed salmon because of PCBs and other concerns.

From the above, it appears to me that some of your work to demarket farmed salmon has been funded as part of a well-funded American campaign to promote MSC-certified seafood products, most of which are Alaskan wild and ranched salmon.

4. As shown below, *SeaWeb* was funded by the Gordon and Betty Moore Foundation to co-ordinate an "antifarming campaign" involving "integration of aquaculture science messages," "earned media," and "co-ordination of media for antifarming ENGOS (environmental organizations)."

SeaWeb		\$560,000	Apr. 2004
Wild Salmon, Consumers, and Conservation Project			
Term	Amount	Date Approved	
24 mo.	\$560,000	Apr. 2004	
Purpose			
This grant helps SeaWeb provide a toolkit and coordination for salmon aquaculture campaigns. Outcomes for this grant include identification of antifarming audience and issues, integration of aquaculture science messages into antifarming campaign, standardization of antifarming messaging tool-kit, creation of an earned-media campaign, and coordination of media for antifarming ENGOS.			
Grantee Websites			
SeaWeb 			

According to U.S. tax returns for 2004 and 2005, the purpose of this campaign was "to shift consumer and retailer demand away from farmed salmon."¹⁴

5. As it appears to me, the "antifarming campaign" (eg. the Farmed and Dangerous campaign, the Smarten Up Safeway campaign and the Pure Salmon campaign), is part of the "Context Setting" of the Seafood Choices strategy and what the Packard foundation refers to as '*grantee work to influence non-responsive buyers*.'¹⁵

Without controversy over farmed salmon and fear of injury to corporate reputation, it would be difficult to convince retailers and consumers that they should opt for MSC-certified Alaskan salmon, often at a higher price than farmed salmon.

6. The David Suzuki Foundation could draw attention to the positive aspects of farmed salmon and salmon farming. For example:
 - Farmed salmon is very *low* in mercury and, according to the U.S. Institute of Medicine, farmed salmon is *higher* in omega-3 fatty acids than any other fish.¹⁶
 - Salmon farming avoids the risks of over-fishing and the by-catch and killing of endangered stocks of wild salmon and endangered whales.

You could also point out that your computer-generated predictions of the impact of sea lice included predictions of *high survival* (eg. 69 - 91 per cent *survival* of chum salmon from Knight Inlet). Emphasizing these points, however, would not help to sway market share towards wild fish and away from farmed salmon - which is what Environmental Defense, *SeaWeb* and its campaigns, have been funded to do. I believe that this raises questions: Is this the reason that you don't mention the positive aspects of farmed salmon and salmon farming? Is this the reason that you have selectively reported and misreported your own sea lice research findings?

7. In the sea lice research funded and publicized by the David Suzuki Foundation (Krkosek et al., 2007), and the controversial study of contaminants in farmed salmon by Hites et al. (2004), there are several parallels:
 - The international publicity of both studies was unusually extensive and negative.
 - The David Suzuki Foundation, *SeaWeb* and Environmental Defense issued press releases about both studies on *the day before* they were officially published.^{17,18,19,20,21,22}
 - Both Hites et al. (2004) and Krkosek et al. (2007) have been reported in articles with the same title, "Good Fish, Bad Fish."^{23,24} This type of reporting facilitates the flawed, categorical positioning of 'wild' salmon as safe and sustainable and farmed salmon as unsafe and unsustainable.
 - Both studies have been harshly criticized for serious flaws.^{25,26,27,28,29,30,31,32,33,34,35,36,37,38}
 - Both studies were published in the journal *SCIENCE* while the Editor-In-Chief, Dr. Donald Kennedy, was a trustee of the Packard foundation.
8. I would find it hard to believe that the bad press over sea lice is not part of *SeaWeb's* "earned media" and the "Context Setting" of *SeaWeb's* Seafood Choices strategy. Here's why:
 - Sea lice research, funded and publicized by the David Suzuki Foundation, was conducted by the Centre for Mathematical Biology (CMB) at the University of Alberta (UofA), in Edmonton. The CMB has reported to the administration of the UofA that it had a "research partnership" with *SeaWeb*.³⁹
 - *SeaWeb* and its campaigns publicized the CMB's sea lice research in 2005, 2006 and 2007. *SeaWeb* reports that the international publicity of the sea lice research by the University of Alberta is one of its "top accomplishments."⁴⁰
 - In 2006, the CMB reported to the University of Alberta that in 2005, *SeaWeb* generated 147 news stories about its sea lice research.⁴¹
 - In December 2007 alone, Google News listed about 250 news stories that negatively reported the sea lice research findings.⁴² More than two thirds of the stories actually ran the day *before* the paper was officially published. Dr. Martin Krkosek, the lead sea lice researcher, reports that his sea lice research has been reported in more than 500 news stories.⁴³ See <http://www.math.ualberta.ca/~mkrkosek/media.htm>

9. Sea lice is now cited as the top reason for the Farmed and Dangerous campaign.⁴⁴ At the web-site of the Pure Salmon campaign, eight of the nine video/audio clips are about sea lice.⁴⁵ The Pure Salmon campaign also produces Twyla Roscovich's videos (<http://www.callingfromthecoast.com/>) about Alexandra Morton's campaign against salmon farming.⁴⁶ In my opinion, without the sea lice research papers published in a prestigious scientific journal such as *SCIENCE*, there would be no credible basis for the anti-farmed salmon campaigns, least of all for the Smarten Up Safeway campaign and its tag-line, "Ingredients for Extinction."⁴⁷
10. Facing stiff competition from farmed salmon and many other difficulties, the value of Alaskan salmon collapsed from a yearly average of \$432 million in the 1980s to \$165 million in 2002.⁴⁸ The Alaska Fisheries Office reported, "Alaska salmon continues to fall well short of the fine quality of farmed Atlantic salmon."⁴⁹ Since 2003 and the bad press over PCBs in farmed salmon and sea lice, many consumers and restaurants have shifted back to 'wild' salmon, most of which is Alaskan. According to the Alaska Department of Fish and Game, the ex-vessel value of Alaskan salmon has more than tripled from \$125 million to \$409 million.⁵⁰

The Alaska Department of Fish and Game and several suppliers of Alaskan salmon provide links to the web-pages of the David Suzuki Foundation including your brochures, "*Why You Shouldn't Eat Farmed Salmon*," and "*The Skinny on Salmon*."^{51,52,53,54,55,56,57,58}

The Executive Director of the Alaska Seafood Marketing Institute once wrote, "In our case, it is far more credible to leave the attack to third parties, such as environmental groups and newspaper columnists, (than) it is for us to come out and do it ourselves. We can then leverage that information with a marketing campaign pointing out the positive aspects of our fish using the bad things about farmed fish as our points of difference. And that is exactly what we are doing."⁵⁹

Dr. Suzuki, my questions to you are:

- Is the bad press that you and your foundation have generated about PCBs in farmed salmon and sea lice part of *SeaWeb's* "earned media" and the "Context Setting" of *SeaWeb's* Seafood Choices strategy for swaying market share away from farmed salmon and towards MSC-certified seafood products, most of which are Alaskan wild and ranched salmon?
- To put it bluntly, have you intentionally manufactured controversy over PCBs in farmed salmon, and sea lice because this serves the purposes of your American funders? If this *isn't* the reason that you selectively report and misreport your own research findings on PCBs in farmed salmon, and sea lice, what is the reason?
- Why have you not responded to the information that I have provided to you over the past two years?

In closing, I reiterate my appeal to you to set the record straight and publicly clarify that:

- a) Your research does not show that farmed salmon is high in PCBs, and
- b) Your research does not show that sea lice originating from salmon farms are causing high levels of mortality among juvenile salmon in the wild.

You may reach me at 604.618.8110 or at vivian.krause@mac.com.

Sincerely,

Vivian Krause

SOURCES

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³⁷ http://www.al.gov.bc.ca/ahc/fish_health/Sealice/AAVBC_sealice_comments.pdf

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Removed in the spring of 2008. A printed copy is available.

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⁴² A printed copy of this information is available.

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