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Canada

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PRACTITIONERS GUIDE

to Writing Letters Used in *Fisheries Act*
and *Species at Risk Act* Reviews
for *Habitat Management Staff*

Version 2.0

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Habitat Management Program

Fisheries and Oceans Canada



Canada

The Practitioners Guide to Writing Letters Used in Fisheries Act and Species at Risk Act Reviews is one in a series of Practitioners guides which are intended to provide clear and nationally consistent guidance to Habitat Management practitioners (Practitioners) making regulatory decisions related to the habitat protection provisions of the *Fisheries Act* and the *Species at Risk Act*. Together these guides support the objective of providing a predictable and coherent approach to the regulatory review of works or undertakings that affect fish and fish habitat across Canada.

This guide provides guidance on preparing letters commonly used by Practitioners in managing potential impacts to fish and fish habitat which may arise from the implementation of development proposals.

http://oceans.nrc.dfo-mpo.gc.ca/habitat/home_e.asp

Cette publication est également disponible en français.

http://oceans.nrc.dfo-mpo.gc.ca/habitat/home_f.asp

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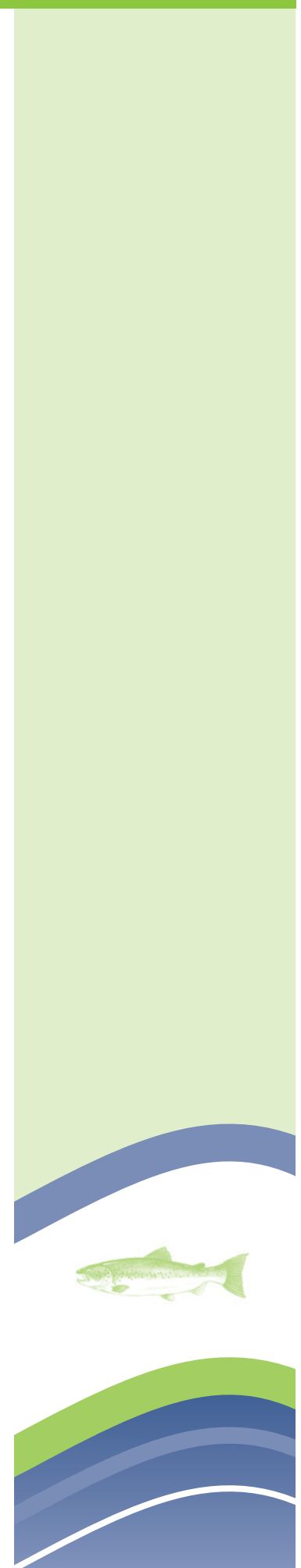


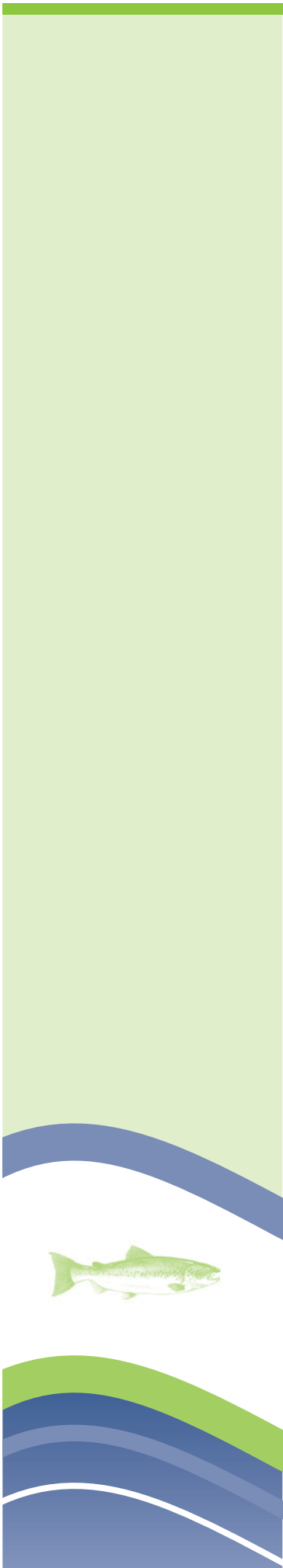
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1.0 Introduction

As part of Fisheries and Oceans (DFO) commitment to ongoing improvement of its policies, a detailed review of Version 1.1 of the *Practitioners Guide for Writing Letters Used in Fisheries Act Reviews* was undertaken in August 2006. Since the release of Version 1.1, the Habitat Management Program has adopted a Risk Management approach to referral review, and provided greater clarity on issues involving the *Species at Risk Act* (SARA) and fish passage. These changes are reflected in the structure and content of this guide.

Template letters have also been updated to more accurately reflect the range of legislative requirements that Habitat Management practitioners (Practitioners) consider during their reviews. While the previous template letters focused primarily on section 35 of the *Fisheries Act*, the new letters recognize DFO's decision making authority related to all of the habitat protection provisions of the *Fisheries Act* and the requirement to administer those sections of SARA that relate to aquatic species.

Priority was given to making letters more user-friendly by replacing legislative terminology with language better suited for conveying a clear and concise message to the intended audience. Template letters may need to be updated from time to time, so please refer to the DFO intranet site at http://oceans.nrc.dfo-mpo.gc.ca/habitat/hmp/guides/letter-templates_e.asp or consult the Program Activity Tracking System (PATH) for the most current versions.



2.0 Purpose of this Guide

The purpose of this guide is to assist Practitioners in preparing letters commonly used in the review of works or undertakings that are being proposed. Matters concerning the operation of existing facilities, enforcement, monitoring, interdepartmental correspondence, *Canadian Environmental Assessment Act* (CEAA) triggers or scoping are not included in this guide. Template letters have been developed¹ to streamline the process of developing correspondence and establish language which is consistent across the country. While it is expected that these templates may require some modification to accommodate unique situations, this discretion should be exercised with input from management staff to ensure changes are consistent with national policy.

3.0 Legal and Policy Context

One of the primary roles of Practitioners is to review development proposals and provide advice to proponents on whether or not they are likely to be in compliance with the habitat protection provisions² of the *Fisheries Act*, and those prohibitions of the *Species at Risk Act* (SARA) which apply to aquatic species. Letters routinely used to convey this advice often recommend mitigation measures used to offset impacts³ to fish and fish habitat. In those situations where a development proposal is not likely to be in compliance, the Practitioner may ask for more information, request the project be relocated or redesigned, or outline the steps required to obtain a *Fisheries Act* authorization or SARA permit.

It is important that letters providing advice, including letters which request additional information, are clearly distinguished from other types of correspondence that DFO might issue. Table 1 describes the various types of correspondence issued to proponents by DFO.



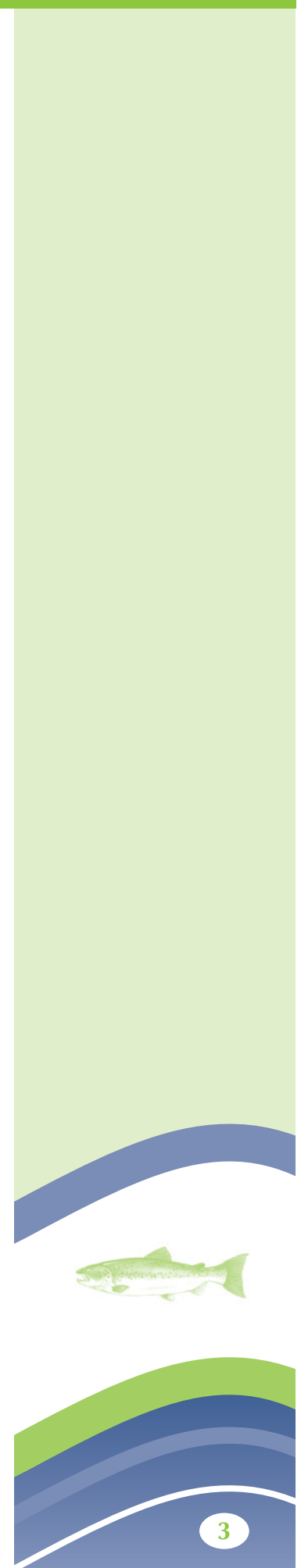
¹ Please refer to the DFO intranet site at http://oceans.nrc.dfo-mpo.gc.ca/habitat/hmp/guides/letter-templates_e.asp or consult the Program Activity Tracking System (PATH) for the most current versions.

² The habitat protection provisions of the *Fisheries Act* include many sections (i.e. 20, 21, 22, 26, 27, 28, 30, 32, 34, 35, 37, 40, 43), however, Sections 20, 22, 32 and 35 are the most relevant in terms of reviewing and approving most development proposals submitted to DFO.

³ The *Practitioners Guide to the Risk Management Framework*, uses the term 'Effect' to refer to a change to fish and fish habitat which can either be positive or negative, while the term 'Impact' refers specifically to those effects which are considered adverse or negative.

Table 1: Description of the various types of correspondence used by DFO

Type of Correspondence	Description
<i>Letter of Advice</i>	<p>A letter where information is being conveyed directly to the proponent, which does not amount to a formal Authorization, Order or Permit. Generally speaking a Letter of Advice accomplishes one or more of the following functions:</p> <ul style="list-style-type: none"> • Concludes that a development proposal poses a low risk of impacting fish and fish habitat, • Provides advice to reduce potential impacts to an acceptable level, • Informs proponents of the process leading up to the issuance of a <i>Fisheries Act</i> authorization or SARA permit, or • Requests additional information where proposals could impact fish and fish habitat, but where uncertainly precludes a definitive conclusion.
<i>Authorization</i>	<p>Where impacts to fish and fish habitat are expected, an authorization is often required to ensure the person causing the impacts is in compliance with the <i>Fisheries Act</i> and/or SARA. Authorizations generally include conditions regarding the application of mitigation, compensation, and monitoring. Where more than one section of the <i>Fisheries Act</i> applies to a given proposal, conditions related to each section can be included into a single authorization, which in most cases will be a Section 35(2), <i>Fisheries Act</i> authorization. Similarly, conditions pertaining to a SARA permit could be included into a <i>Fisheries Act</i> Authorization as well.</p>
<i>Order</i>	<p>Pursuant to subsection 37(2) of the <i>Fisheries Act</i>, an order may be issued requesting modifications or restrictions to plans or when an unauthorized harmful alteration, disruption or destruction of fish habitat (HADD) is imminent or occurring and the proponent is uncooperative in protecting fish and fish habitat. Such an order would require approval from the Governor in Council.</p>



Throughout this guide the term 'Authorization' is used to refer to both a *Fisheries Act* authorization and/or a SARA permit. Most situations requiring the issuance of a SARA permit will also require a *Fisheries Act* authorization. Where both legislations apply the *Fisheries Act* authorization is to be used as the main regulatory approval mechanism, within which specific SARA conditions can be included. This is also referred to as a 'SARA-compliant *Fisheries Act* authorization'. Where a SARA permit is required in the absence of a proponent needing a *Fisheries Act* authorization, Practitioners should refer to the *Practitioners Guide to the Species at Risk Act* or seek advice from their regional SARA representative.

The term 'Authorization' has been carried over into the template letters to allow both pieces of legislation to be discussed without distracting the proponent unnecessarily with legislative terminology. Similarly, the term 'impacts to fish and fish habitat' encompasses all the habitat protection provisions, and impacts to aquatic species at risk, which are prohibited under Section 32, 33 and 58 of the *Species at Risk Act*.

In keeping with the recent direction within DFO to adopt a risk-based approach to referral review, Table 2 uses the established risk categories as a basis by which to differentiate the various Letters of Advice.

Table 2: Overview of risk categories

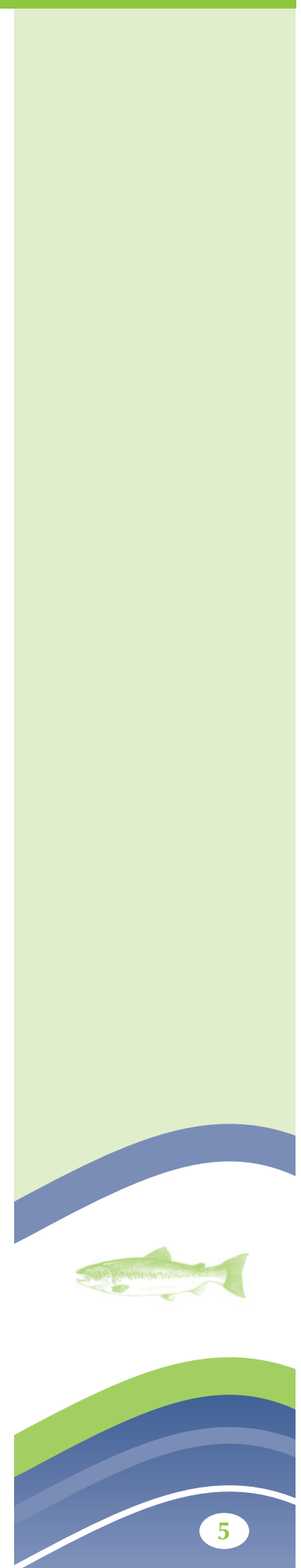
Risk Category	Description
<i>Low Risk</i>	Little to no impact on fish and fish habitat. A <i>Fisheries Act</i> authorization would not be required. The advice in these letters may include recommended additional mitigation measures.
<i>Medium Risk</i>	Impacts to fish and fish habitat that require a <i>Fisheries Act</i> authorization, but where a streamlined authorization process has already been formally established. Given the limited number of streamlined authorization processes currently established in Canada, this category is not discussed in this document. If a proposal falls in this category and a "streamlined" authorization process has not yet been established, then a site-specific authorization would be required. (i.e. treated as High Risk)
<i>High Risk</i>	Impacts to fish and fish habitat that require a <i>Fisheries Act</i> authorization. Letters of Advice for high risk proposals generally inform proponents of the process involved in obtaining an authorization, while promoting the concepts of relocation and redesign.
<i>Significant Risk</i>	Where impacts to fish and fish habitat are such that it would be improbable or impractical to achieve No-Net-Loss. Under these circumstances, DFO is identifying relocation or redesign as the only practical means for the proposal to proceed.



The low and high risk letter categories can be further subdivided to reflect specific scenarios or conditions that must be met in order for the advice to be valid, such as shown in Table 3.

Table 3: Common scenarios and corresponding template letters

	Conclusion	Scenario	Previous Letter(s)	New Letter
<i>Insufficient Information</i>	Proposal could result in impacts to fish and fish habitat.	Request for additional information.	Letter A: Insufficient information	Request for Additional Information
<i>Low Risk</i>	Proposal not likely to result in impacts to fish and fish habitat.	... provided that plans are implemented as described. (i.e. no additional mitigation measures required and/or no fish habitat present.)	Letter B: No concerns. Not in or near fish habitat. Letter C: No HADD likely as proposed.	Low Risk – As Proposed
		... provided that additional mitigation measures are applied.	Letter D: No HADD likely with additional fish habitat protection measures.	Low Risk – Additional Mitigation
<i>High Risk</i>	Proposal likely to result in impacts to fish and fish habitat.	DFO authorization required.	Letter G: Development proposal will likely result in a HADD, outline process to proponent.	High Risk – Authorization Process
<i>Significant Risk</i>	Proposal likely to result in significant impacts to fish and fish habitat.	Request relocation or redesign.	Letter E: Rejected as proposed. Unacceptable HADD, request for relocation/redesign. Letter F: Rejected as proposed. Unacceptable HADD, no authorization issued	Significant Risk – Relocation or Redesign



4.0 Components of template letters

The template letters have each been constructed from the same basic components. The template letters reflect a set of scenarios which are commonly encountered by Practitioners during referral reviews. Where necessary, certain components can be further refined to address case-specific circumstances that inevitably arise. The following sections include a brief description of each of the components and offers advice on how the template letters could be modified, while still maintaining a level of national standardization and coherency.

4.1 File Information

At the top of each letter is a box which identifies the referral title the file number assigned by DFO. This box also includes a spot for a file number that may have been assigned by the proponent. Starting January 1, 2008, PATH will be implementing a new numbering system which will assign a unique identifier to each new habitat referral across Canada. In support of this initiative, template letters will now carry the PATH number rather than regional variants.

4.2 Recipient

In most cases the letter should be addressed to the proponent of the development proposal. This ensures that the proponent is aware of the results of DFO's review as well as any advice involving suggested redesign, relocation or the application of additional mitigation measures.

Exceptions do exist, such as where there are working arrangements in place between DFO and another agency (e.g., province) or where a proponent has been given explicit written direction that a consultant or other body act on their behalf. Template letters which reflect third party involvement are available through PATH.

4.3 Subject Line

In the past, the *Subject Line* of each Letter of Advice contained various pieces of information, including the presence/absence of SARA species, the waterbody, proponent and other aspects of the development proposal. Since most of this information is included in the PATH title; which is referred to in the body of the letter; the *Subject Line* is now simply a concise sentence which summarizes the intent of the letter. This allows the proponent to quickly recognize the conclusion of DFO's review.



4.4 Opening

The following text has been included in each Letter of Advice in order to clearly establish the purpose of DFO's review.

Fisheries and Oceans Canada - Fish Habitat Management Program (DFO) received your proposal on **[RECEIVE DATE]**. Please refer to the file number and title below:

DFO File No.: **[DFO FILE NO.]**

Title: **[REFERRAL TITLE]**

Your proposal has been reviewed to determine whether it is likely to result in impacts to fish and fish habitat which are prohibited by the habitat protection provisions of the *Fisheries Act* or those prohibitions of the *Species at Risk Act* that apply to aquatic species.*

This statement is accompanied by a footnote which highlights the key provisions of each Act that are most relevant to DFO's review of development proposals. By clearly stating the purpose and authority under which the DFO review is being conducted, it alleviates the need to specifically exclude legislation that DFO does not directly consider, such as Section 36(3) of the *Fisheries Act*, or other provincial legislation.

The *Opening* included in the template letters is used as an initial correspondence on a given proposal. As such, it clearly establishes the purpose of DFO's review. Any subsequent correspondence on a given referral need not repeat this information, but instead should highlight the status of the referral and reference any previous correspondence that has been issued. The following wording can be used to replace the *Opening* of the template letters in those situations where the letter is not an initial correspondence:

Thank you for responding to my earlier correspondence of **[DATE]**. As you recall **[DESCRIBE THE ISSUE]**.

4.5 Information Received

List any background information that was used to make a decision. This includes any relevant telephone conversations, meetings, letters, faxes, plans, reports and drawings (include full title, author, page and figure numbers if necessary). The most current versions of these pieces of information should be referenced. Where only a few information sources exist, this section may take the form of a simple sentence, while for more complex proposals this might be more aptly presented as a bulleted list.



Table 4: Examples of ways of representing information received

Scenario	Suggested Wording
Simple proposal	My review included our telephone conversation of March 23, 2005 and the report entitled, 'Josh's Big Dock Plans', dated January 03, 2005.
Complex proposal	My review included: <ul style="list-style-type: none"> • Our telephone conversation of March 23, 2005, • the report entitled, 'Josh's Big Dock Plans', dated January 03, 2005, • a site visit to your property on May 8, 2005, and • your letter entitled 'Additional Mitigation Plan' dated June 16, 2005.

4.6 Description of Proposal

A section called *Description of Proposal* describes the location, description and scheduling of the proposed development. This is where such things as the dimensions, timing of the work(s) and any fish habitat protection measures that have been included in the plans should be listed.

The details included in this section should only reflect what has been included in the plans or provided through other sources of information received (e.g. meetings, telephone conversations, etc.). Table 5 offers some of the key items to be included in the *Description of Proposal*, along with some suggested wording.

Table 5: Items to be included in the *Description of Proposal*

Item	Sample Wording
Location	<ul style="list-style-type: none"> • The dock will be installed at lot x, concession y, County of Northwind, Tiny Township, Municipality of Vintage.
Description	<ul style="list-style-type: none"> • The dock will be 5 metres long by 3 metres wide and supported by four (4) posts. • The proposal does not include any dredging or alteration of the shoreline.
Mitigation Measures	<ul style="list-style-type: none"> • The dock will be constructed of untreated materials, to avoid leaching of hazardous chemicals. • Sediment and erosion control measures will be applied to prevent the entry of sediment into the water.
Scheduling/Timing	<ul style="list-style-type: none"> • The construction will occur between June and September in 2004 or 2005



It may also be relevant to clearly state specific activities (such as dredging in the above example) which were not considered as part of the review.

When describing the project, the term 'will' is used because it reflects specific details which the proponent has agreed to, and which are fundamental to DFO's decision making process. The term 'should' is used when additional mitigation measures are being suggested.

The statement which refers to the Scheduling/Timing of the work is particularly important. This helps to ensure that the works will not carry over into timing windows which may have been set by DFO or fisheries management agencies. This statement also establishes an expiration date. If the work is not completed within the timeframe described, the proponent should seek advice from DFO to ensure that designs and mitigation measures are still in keeping with best management practices.

If the Practitioner finds it necessary to recommend additional mitigation measures then the 'Low Risk – Additional Mitigation Measures' letter should be used. This letter includes a section specific to listing additional mitigation measures.

4.6.1 Wording if SARA species present.

Each of the template letters include a section which notifies the proponent where aquatic species at risk may be affected. This section would simply be omitted if not pertinent to a specific proposal. Reference to aquatic species at risk has intentionally been placed before the *Statement of Decision* to reflect the logical decision-making steps associated with the Risk Management Framework. Practitioners should refer to the *Practitioners Guide to the Species at Risk Act* or seek advice from their regional SARA representative whenever SARA species are likely to be impacted by a proposal.

4.7 Decision (Risk Determination)

The *Statement of Decision* is synonymous with the Risk Management Framework's determination of risk, and reiterates the conclusion in the *Subject Line*.

For high risk proposals it is important to clearly state that an authorization would be required for the project to be in compliance with the *Fisheries Act* and/or SARA. Wording to this effect has been incorporated into the template letters.

This conclusion must be followed by a rationale in support of the decision.

For situations calling for the issuance of a 'Significant Risk – Relocation or Redesign' letter, the rationale should speak to why impacts to fish and fish habitat are considered significant.

For situations calling for the issuance of a 'High Risk – Authorization Process' letter, the rationale should include a list of the relevant legislative sections which are likely to be exercised (Table 6).

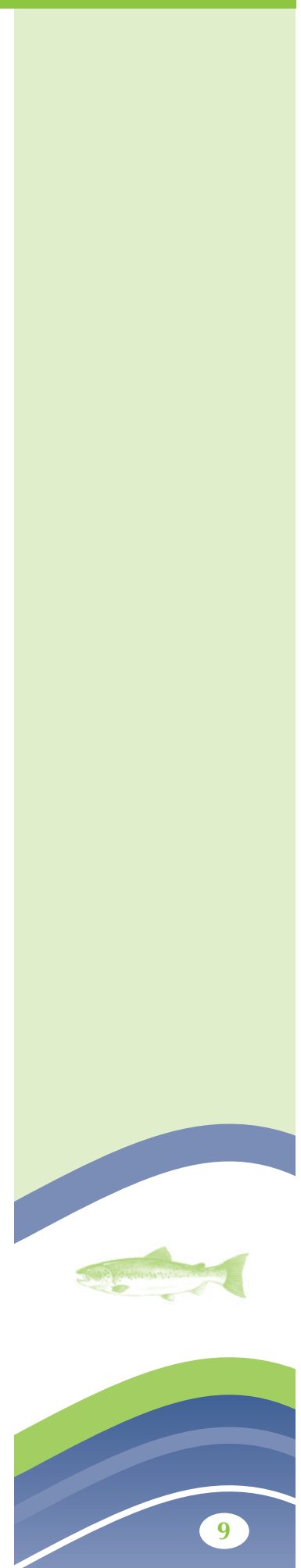


Table 6: Wording used to reflect the sections of legislation being applied

Scenario	Suggested Wording
	Of particular concern is the potential for your proposal to result in:
Section 35 - <i>Fisheries Act</i>	The harmful alteration, disruption or destruction of fish habitat (HADD), which is prohibited under Section 35 of the <i>Fisheries Act</i> .
Section 32* - <i>Fisheries Act</i>	The destruction of fish by means other than fishing, which is prohibited under Section 32 of the <i>Fisheries Act</i> .
Section 20 & 22 - <i>Fisheries Act</i>	[In the context of reviewing new development proposals section 35 is the appropriate regulatory mechanism for dealing with potential impacts to flow or fish passage. Sec 20 and 22 are reserved for dealing with existing facilities. See <i>Practitioners Guide to Fish Passage</i> .]
Sections 32, 33 & 58 - <i>Species at Risk Act</i>	Impacts to aquatic species at risk, which are prohibited under Section 32, 33 or 58 of the <i>Species at Risk Act</i> . Impacts to aquatic species at risk can only be permitted where it can be proven that they will not jeopardize the survival or recovery of the species.

* if both section 35 and 32 need to be exercised for a particular project, a section 35(2) authorization would be the regulatory mechanism in which section 32 conditions would be added.

Those legislative sections which are not applicable to a particular proposal should be omitted.

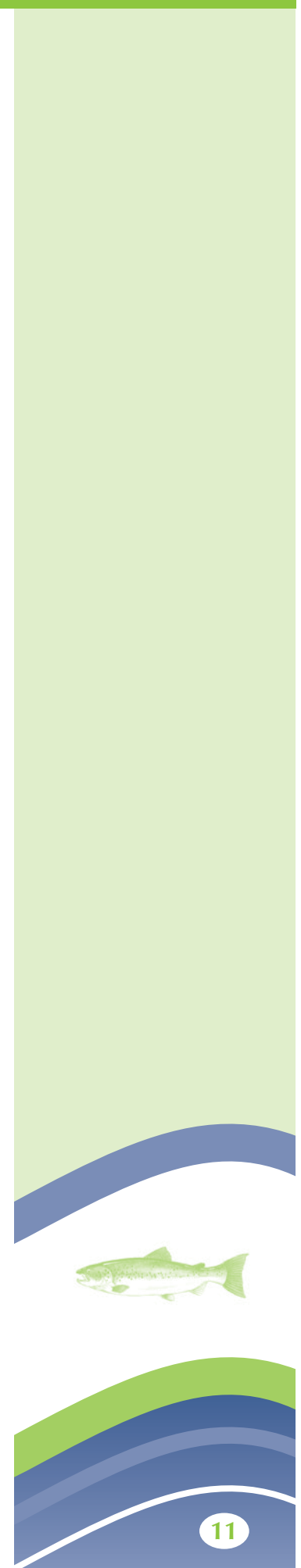
The 'High Risk – Authorization Process Letter' is also intended to notify proponents that an environmental assessment may need to be conducted before a *Fisheries Act* authorization can be issued. Environmental assessments are generally conducted in accordance with the *Canadian Environmental Assessment Act*; except for those parts of the Yukon, Nunavut and the Northwest Territories where other environmental legislation may also exist (i.e. the *Yukon Environmental and Socio-economic Assessment Act* (YESAA), the *Mackenzie Valley Resource Management Act* (MVRMA)). In Nunavut and environmental assessment must be conducted under both CEAA and the *Nunavut Land Claims Agreement*.

Table 7 includes text to be inserted into the 'High Risk – Authorization Process Letter' which reflects the particular environmental legislation applied in various parts of the country.



Table 7: Wording to reflect the various environmental assessment legislations applied across Canada

Environmental Legislation	Suggested Wording
<i>Canadian Environmental Assessment Act</i>	<p>Before a <i>Fisheries Act</i> authorization can be issued, DFO must ensure that an environmental assessment is conducted which meets the requirements of the <i>Canadian Environmental Assessment Act</i>. This process may involve circulating your proposal to other relevant federal departments and making information about your proposal available to the public through the Canadian Environmental Assessment Registry (CEAR). For more information about the CEAR please visit www.ceaa-acee.gc.ca.</p>
<i>Mackenzie Valley Resource Management Act</i>	<p>Before a <i>Fisheries Act</i> authorization can be issued, DFO is required to notify the Mackenzie Valley Land and Water Board and conduct a preliminary screening of the proposal pursuant to subsection 124(1) of the <i>Mackenzie Valley Resource Management Act</i>. This process may involve circulating your proposal to other relevant federal departments and making information about your proposal available to the public through a public registry.</p>
<i>Yukon Environmental and Socio-economic Assessment Act</i>	<p>Before a <i>Fisheries Act</i> authorization can be issued, an environmental assessment must be conducted pursuant to the <i>Yukon Environmental and Socio-economic Assessment Act</i> (YESAA). For more information about YESAA please visit www.yesab.ca.</p>
<i>Nunavut Land Claims Agreement</i>	<p>Before a <i>Fisheries Act</i> authorization can be issued, DFO must ensure that an environmental assessment is conducted which meets the requirements of the <i>Canadian Environmental Assessment Act</i>.</p> <p>Your proposal must also be referred to the Nunavut Planning Commission and/or the Nunavut Impact Review Board (NIRB) to allow for an assessment of the proposal relative to the provisions of Articles 11 and 12 of the <i>Nunavut Land Claims Agreement</i>.</p> <p>These processes may involve circulating your proposal to other federal/territorial departments and information about your proposal may be made available to the public through the Canadian Environmental Assessment Registry and the NIRB public registry. For more information about these processes please visit www.ceaa-acee.gc.ca and http://ftp.nunavut.ca/nirb/.</p>



This reference is only meant to notify the proponent of the potential for an environmental assessment and is not meant as a formal notification that the environmental assessment process is being initiated. This gives the proponent an opportunity to consider the options of relocation and redesign, before having to develop compensation and monitoring plans or collect the additional information which is often required to complete an environmental assessment. For those situations where an environmental assessment is being triggered, please refer to PATH for the appropriate CEAA template letters.

If an environmental assessment is not required for a given development proposal (e.g. project on the exclusion list, maintenance activity, emergency works, etc.) then this paragraph should be omitted.

4.8 Next Steps

Each letter should clearly state what is expected of the proponent.

Low risk letters include a statement indicating that the proponent is able to proceed with their proposal. If this conclusion is based on the application of additional mitigation measures, then this too must be clearly described in the letter.

For 'High Risk' and 'Request for Additional Information' letters the key message is that something must happen in order for the review or authorization process to continue.

This might include one or more of the items listed in Table 8.

Table 8: Common next steps and standardized wording for high risk template letters

Scenario	Next Steps
Application form required	Complete the attached application form.
Additional information required	Provide additional information regarding:
	<ul style="list-style-type: none"> The fish and fish habitat that is likely to be affected by your proposal.
	<ul style="list-style-type: none"> The detailed design, construction techniques and mitigation measures being proposed.
	<ul style="list-style-type: none"> The proposed compensation plan, including a rationale on how it will achieve no net loss to the productive capacity of fish habitat.
	<ul style="list-style-type: none"> A monitoring plan that will ensure compensation and mitigation measures function properly.
Application form required for Nunavut	<ul style="list-style-type: none"> Any relocation or redesign options considered for reducing impacts to fish and fish habitat.
	<ul style="list-style-type: none"> Complete the NIRB Part 1 application form and the Part 2 form if it is relevant to your proposal. NIRB forms can be found at: http://ftp.nunavut.ca/nirb/NIRB_ADMINISTRATION/NIRB_FORMS/



Those items which are not applicable to a particular proposal should be omitted. Where they exist, it may also be appropriate to refer to attachments such as information requirement sheets.

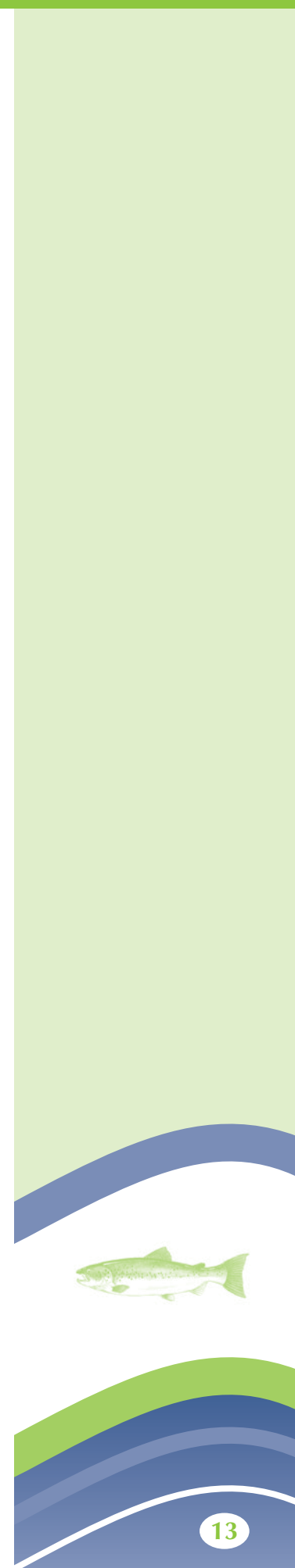
4.9 Closing

The *Closing* of each letter is composed of a disclaimer which has been tailored to reflect the specific circumstances surrounding the proposal. Table 9 provides the standardized wording which applies to each template letter.

Table 9: Standardized wording for the disclaimer in the Closing of each template letter

Template Letter	Standardized Wording
	Please be advised, that any impacts to fish and fish habitat which result from ...
Request for Additional Information	... proceeding with your proposal ...
Low Risk – As Proposed	... a failure to implement this proposal as described ...
Low Risk – Additional Mitigation	... a failure to, implement this proposal as described or, incorporate the additional mitigation measures included in this letter ...
High Risk – Authorization Process	... proceeding with your proposal without first obtaining a <i>Fisheries Act</i> authorization ...
Significant Risk – Relocation or Redesign	... proceeding with your proposal without first obtaining a <i>Fisheries Act</i> authorization ...
	... could lead to corrective action such as enforcement.

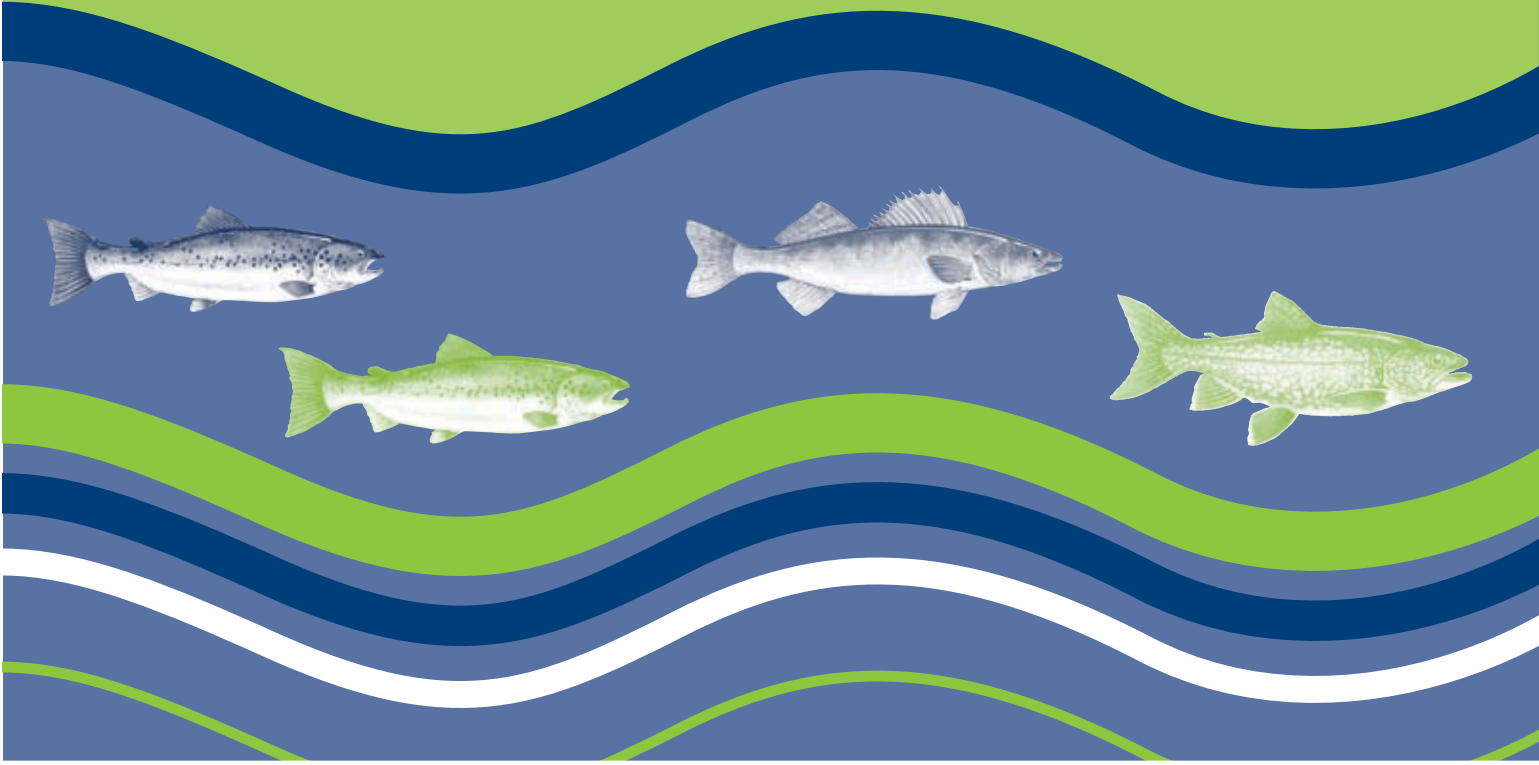
This is followed by a concluding statement, offering clear direction on who to contact should there be any questions. The template letters provided reflect DFO's internal signing protocol in so much that Low Risk letters are signed by the Practitioner, while High Risk letters are signed by someone other than the person reviewing the file. Where this wording does not reflect regional processes, the closing should be modified appropriately.





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