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March 18, 2011  
File No.: 259040.00032/14288

**VIA EMAIL**

Don Staniford  
The Global Alliance Against Industrial Aquaculture  
dstaniford@gaaia.org

**Attention: Don Staniford**

Dear Sirs/Mesdames:

**Re: Defamatory material and links to defamatory material on  
<http://www.gaaia.org> (the “Website”)**

We are legal counsel to Cermaq ASA, and its subsidiary EWOS Canada Ltd, doing business, in part, as Mainstream Canada (the “Companies”). Cermaq is a Norwegian company, which is a global leader in the sustainable aquaculture industry. Mainstream and EWOS are business areas within Cermaq involved in fish farming operations and production of fish feed globally and in British Columbia. The activities in British Columbia are carried out through the company EWOS Canada Ltd., where the division Mainstream Canada is responsible for the fish farming operations.

We write to you about the false and defamatory postings on the Website, which is operated by you and the Global Alliance Against Industrial Aquaculture (“GAAIA”). These statements, summarized below, entitle the Companies to sue you and GAAIA for defamation, and to seek general damages, special damages and punitive damages.

We understand that you are ideologically opposed to fish farming and that you are pursuing a campaign against the aquaculture industry in support of your ideology. While you are, of course, entitled to your opinions on the merits of aquaculture, as you know from your experience in litigation with Creative Salmon, you must get your facts straight when expressing your opinion. You have not done this on the Website. You have done the opposite. You have posted many false statements of fact as the basis of your campaign against the aquaculture industry, including against our clients.

There are so many false and defamatory statements on the Website that it is impractical to catalogue them here. A particularly striking example, however, is found in your “press

release” entitled “Salmon Farming Kills”.<sup>1</sup> Your statements compare farmed fish to tobacco products and our clients are labelled as “killers”.

This press release is accompanied by graphic images, containing the words “Norwegian Owned” and “92% Norwegian Owned”, which links the publication to the Companies. The fish farming industry in British Columbia is a concentrated marketplace with very few participants. The words and images used by you and GAAIA would lead people acquainted with fish farming in British Columbia, and elsewhere, to believe that your defamatory statements are about Cermaq, Mainstream and EWOS.

The law has long recognized that free speech does not extend to damaging the reputation of another. A person whose reputation is injured in this way is entitled to a legal remedy. The Companies will not sit idly by and see their employees in British Columbia being met with false statements that salmon farming kills and is cancer, or let the Companies’ goodwill and reputation be damaged by your improper conduct.

We hereby demand a formal apology, and that all defamatory statements about salmon farming be removed from your Website. In particular, on behalf of our clients we demand that you:

1. Remove all false statements from the Website, and elsewhere, including, but not limited to, Facebook and Twitter. These statements have been published under three titles: The “Salmon Farming Kills Campaign”, the “Silent Spring of the Sea”, and “Smoke on the Water, Cancer on the Coast”. The following is a non-exhaustive list of examples, included for illustrative purposes, of the false statements found on the Website:
  - (a) “Salmon Farming Kills”
  - (b) “Salmon Farming Kills Communities”
  - (c) “Salmon Farming Spreads Disease”
  - (d) “Salmon Farming Seriously Damages Health”
  - (e) “Salmon Farms are Cancer”
  - (f) “Salmon Farming Kills Around the World”
  - (g) “Salmon Farming is Poison”

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<sup>1</sup> <http://www.gaaia.org/salmon-farming-kills>

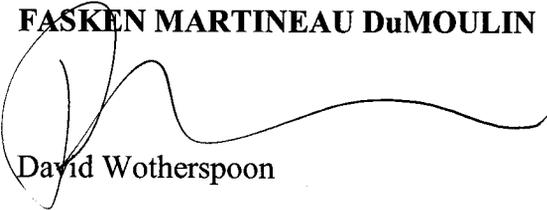
- (h) “Salmon Farming Kills Workers”
2. Remove all references to, or statements about, the Companies and salmon farming operations wherever they may be, whether those statements name the Companies directly or by innuendo and implication;
  3. Cease and desist the same or similar conduct in the future; and
  4. Provide an apology, in the form attached to this letter, signed by you on your own behalf and on behalf of GAAIA, that will be published on the front page of the Website and that may be used by our clients as they see fit.

We require confirmation, by 1:00 pm on Wednesday, March 23, 2011, that these steps have been taken. If you have not done so, we will file a Notice of Civil Claim against each of you and GAAIA without further notice. If this step is necessary we anticipate seeking general, special, and punitive damages, along with costs.

We look forward to your favourable response and would be pleased to discuss any of the foregoing with you or your legal counsel.

Yours truly,

**FASKEN MARTINEAU DuMOULIN LLP**



David Wotherspoon

DKW/grc

## **Don Staniford and GAAIA Apologize**

I write to apologize and to retract false statements made by me, that were published on the Global Alliance Against Industrial Aquaculture (“GAAIA”) website, Facebook, Twitter and elsewhere, in which I criticized industrial aquaculture generally and Cermaq and Mainstream in particular.

Over the past two months, I have published statements on the GAAIA website making false claims that salmon farming is harmful to human health and the environment. Those statements wrongly compared farmed salmon with tobacco products, and claim farmed salmon is a hazardous product, which, among other things, causes cancer.

These statements were untrue and are without foundation. I unreservedly retract and withdraw these statements, and apologize for my actions.

I am pleased to make this apology and retraction, on my behalf and on behalf of GAAIA, and sincerely regret any embarrassment or inconvenience that may have been caused by the statements, which were completely false.