

Findings and Decision - Renewal Application of Kelly cove Salmon Ltd. for AQ#0742

1. Overview:

On September 6, 2019, the Nova Scotia Department of Fisheries and Aquaculture (NSDFA) received an application from Kelly Cove Salmon Ltd. to renew Aquaculture Licence and Lease #0742 (AQ#0742), as described below:

Table 1. Description of Aquaculture Licence and Lease #0742

Type: Marine	Size: 1.52HA
Number: AQ#0742	Cultivation Method: Marine Cage
Applicant: Kelly Cove Salmon Ltd.	Species: Atlantic salmon and Rainbow trout
Location: St. Mary's Bay, Digby County	Proposed Term: 10 year Licence/20 year Lease

2. History

AQ#0742 was first issued to D. B. Kenney Fisheries Ltd on March 3, 1995 for a ten-year term (March 6, 1995 to March 6, 2005). AQ#0742 was assigned to Kelly Cove Salmon Ltd. on February 28, 2003. AQ#0742 was renewed on February 2, 2005 for a five-year term (March 6, 2005 to March 6, 2010). AQ#0742 was renewed on October 13, 2015 for a five-year term (March 6, 2015 to March 6, 2020).

3. Procedure

3.1 Performance Review

A performance review of the information submitted by the operator in support of their renewal application was completed. This review recommended that the site be renewed based on the technical and biological assessment. This performance review is required pursuant to Subsection 72(c) of the Aquaculture Licence and Lease Regulations, and was completed on March 17, 2020.

3.2 Public Comment Period

Notice of the application for the renewal of AQ#0742 for the 30-day public comment period was published on NSDFA's website (<http://novascotia.ca/fish/aquaculture/public-information/>) for the period of January 9, 2020 to February 7, 2020. Notice of the application was also published in the Royal Gazette Part I on January 9, January 16, January 23, and January 30, 2020. Several items were raised that will be further discussed in the *Factors to be Considered* section of the decision.

3.3 Submissions

11 submissions were received by NSDFA during the 30-day public comment period (See attached).

4. Factors to be considered

AQ#0742 forms part of Kelly Cove Salmon Ltd.'s multi-site marine aquaculture operation in Nova Scotia. The site had consistent production over the last licence and lease tenure, and resultant employment reflective of the scale of the operation. The operator's future intentions with respect to AQ#0742 indicate continued production and employment. The operator also indicates continued plans to procure goods and services from local and Nova Scotian businesses where practical. Affiliated companies of Kelly Cove Salmon Ltd. also operate a feed mill (Northeast Nutrition, located in Truro) and a seafood distribution outlet (True North Seafood, located in Dartmouth). Should AQ#0742 not be operated as planned, the Department's site utilization review provisions will be implemented.

Concerns were raised with respect to the location of gear and infrastructure outside of the lease boundaries. An amendment application for AQ#0742 is currently under review with respect to this matter. Kelly Cove Salmon Ltd. has applied for an amendment to the existing lease boundaries in an attempt to ensure that all cages and associated site infrastructure are located within the approved boundaries of the site. This amendment application, as per the *Fisheries and Coastal Resources Act* and the *Aquaculture Licence and Lease Regulations*, is within the purview of the Aquaculture Review Board and will follow the prescribed process for such decisions. Should this boundary amendment application not be approved, Kelly Cove Salmon Ltd. will be required to maintain all gear and site infrastructure within the current site boundaries.

As per the *Fisheries and Coastal Resources Act* and the *Aquaculture Licence and Lease Regulations*, renewals of existing aquaculture sites are within the purview of the Aquaculture Administrator. As such, the renewal application was not required to be submitted to the Aquaculture Review Board for decision. As such, the renewal application is considered a separate application, and particulars that solely pertain to the amendment application are not within scope of the renewal application process.

The operators of AQ#0742 will be required to adhere to all Environmental monitoring provisions of the *Aquaculture Management Regulations*, including the need to maintain sufficient oxidic conditions in the benthic environment. Over the most recent tenure of the site, Environmental monitoring results showed the following results: 2015 – Oxidic A; 2016 – Pass under hard bottom protocol; 2017- Pass under hard bottom protocol; 2018 – Pass under mixed bottom protocol; 2019 – Pass under mixed bottom protocol. In events where Oxidic conditions are not maintained, the operator is required to implement mitigation measures with subsequent sampling to ensure compliance. Subsequent site stocking decisions will be made based upon the past environmental performance of the site. Information on the Environmental Monitoring Program, including descriptions of associated terms, can be found at:

<https://novascotia.ca/fish/aquaculture/aquaculture-management/>.

A review of the application and available information indicates that the nearest salmon rivers from AQ#0742 are the Boudreau River and Meteghan River, each located more than 15 km from AQ#0742 and located within the Southern Uplands Designatable Unit. Furthermore, it is a legislated requirement that the operator of AQ#0742 conform to the aquaculture management regulations specific to containment management through the Farm Management Plans. Also, there were no reported escapes from AQ#0742 over the most recent tenure of the site. However,

in the event of an escape, the operator would be required to adhere to measures prescribed in the Farm Management Plan and in Regulation on escape reporting, auditing and mitigation. The Department is also in the process of implementing a salmonid traceability program, through which any escaped salmonids could be traced back to the operator of origin, to mitigate against such future events

The Farm Operations section of the Farm Management Plan for AQ#0742 will require the operator to indicate how they will operate AQ#0742 in accordance with industry best practices with respect to items such as interactions with wildlife, noise, maintain the site in good order, the removal of decommissioned farm supplies and equipment, and the retrieval of gear or debris that has broken loose. Any complaints received by the Province of Nova Scotia specific to a particular aquaculture site are reviewed by Nova Scotia Environment, with appropriate follow-up and prescribed actions taken if necessary. Additional information on Farm Management Plan requirements can be found at: <https://novascotia.ca/fish/documents/compliance-documents/Minimum-compliance-requirements-Marine-Finfish.pdf>.

The Aquaculture Management regulations include regulatory compliance points with regards to aquatic animal health management. The operator is required to have comprehensive aquatic animal health procedures in place as part of the Farm Management Plan and is also required to adhere to the reporting and notification provisions regarding aquatic animal health management. The Farm Management Plan must include elements relating to finfish husbandry and welfare, veterinary care and disease surveillance practices, biosecurity measures, and emergency measures. Pesticide products must be used according to product labels and following all health and safety requirements and all Federal and Provincial regulations. Bath treatments on sites leased/licenced by the province of Nova Scotia must be conducted in completely enclosed containment.

During the review of the renewal application and the ensuing public submission period, specific concerns were raised with respect to derelict gear and other debris remaining in the marine environment associated with the past operation of AQ#0742. Section 55 of the Licence and Lease Regulations requires an aquaculture licence holder to mark each of their sites in a manner determined by the Minister (see below) and keep each site marked during the term of their licence. Furthermore, AQ#0742 is required to maintain compliance with Transport Canada as it relates to Navigable Waters. The operator of AQ#0742 is also required to maintain a security bond for the site, which can be drawn upon by the Department to perform clean-up activities should the operator fail to perform its obligations with respect to site maintenance. Furthermore, it will be a condition of licence that the operator must comply with any permits, protocols, approvals, licences or permissions which may be required under the laws of the relevant Municipality, the Province or Canada. The operator is also required to adhere to all relevant Government of Canada legislation and regulations that may pertain to conducting aquaculture in the marine environment.

During the public submission period, concerns were raised with respect to the impact of AQ#0742 on local lobster populations and lobster harvesting activity. No specific information was provided that indicated that the past operation of AQ#0742 had a detrimental effect on lobster fishing activities. Several studies from other locations with finfish farming were submitted; however, they did not pertain directly to the aquaculture

renewal application under consideration for AQ#0742. Concerns were also raised with respect to the potential negative impacts of AQ#0742 on the local tourism industry; however, no specific information was provided that indicated that the past operation of AQ#0742 had a detrimental effect on tourism activities. The rate of flushing of the area were also raised during the public submission period. A review of the information available does not suggest that the flushing rate precludes the farming of Atlantic Salmon on this site. Environmental performance, as measured by impacts to the benthic environmental, can be managed on a performance basis.

Public comments outlined general concerns related to super chill events at Marine aquaculture sites in Nova Scotia. A review of information related to AQ#0742 does not indicate losses having occurred due to super chill over the most recent tenure of the site; however, it is a requirement of an approved Farm Management Plan for the operator to have strategies for responding to unusual events and severe weather. It is also required for operators to perform daily monitoring of oxygen and temperature and to implement appropriate mitigation measures when oxygen readings and temperature levels fall below prescribed levels. New technologies exist that were not previously in widespread use in Nova Scotia for salmon farming that allow for real-time monitoring and tracking of oceanographic parameters.

AQ#0742 is one of two marine finfish aquaculture sites currently issued in Grand Passage. AQ#0742 is located approximately 300 metres from the shoreline at its nearest location. The nearest aquaculture site to AQ#0742 is located approximately 1.20 km to the north (AQ#0829). Two additional marine finfish aquaculture sites (AQ#1353 and AQ#1354) are also located within 5.00 km of AQ#0742, located to the east of the village of Freeport on Long Island. AQ#0742 is located within 400 metres of the docking location of the Freeport/Westport ferry. A demonstration tidal turbine is also located in Grand Passage, approximately 800 metres from AQ#0742. Due to the physical separation from other aquaculture sites, the shoreline, and other marine users, there is adequate separation between AQ#0742, the shoreline, and other aquaculture sites to allow for navigation.

5. Decision

Based on the considerations above, Aquaculture Licence #0742 shall be renewed for a period of 10 years (March 6, 2020 to March 6, 2030) and Aquaculture Lease #0742 shall be renewed for a period of 20 years (March 6, 2020 to March 6, 2040).

The Licence and Lease documents shall be prepared in accordance with the standard operating documents of NSDFA, and shall be made publicly available subject to the provisions of the *Freedom of Information and Protection of Privacy Act*.

6. Conditions

In addition, the following condition shall apply:

The operator shall adhere to the following site marking requirements:

- a) mark all corners of the leased site with cautionary yellow buoys of a minimum of 60 cm in diameter;
- b) mark all corners of the leased bottom with a cement block of similar device of a weight sufficient to ensure the cement block or device remains in place at all times; and
- c) display the licence or lease number on 1 corner of the licenses or leased area.

Brennan Goreham

March 31, 2020

Brennan Goreham
Aquaculture Administrator
Nova Scotia Department of Fisheries and Aquaculture

Date

From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Fish Pen Boundary change
Date: February 5, 2020 4:08:30 PM

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Jeanette Denton

[REDACTED]
Westport, NS [REDACTED]
[REDACTED]

To whom it may concern:

I object to the expansion and further use of fish pens in Westport harbour.

When in use, the existing pens have produced an unpleasant odour and fouled beaches which I have witnessed first hand. Periwinkles and clams are not fit to be harvested and the water when viewed at the Irishtown Wharf is murky and coats the keels of boats tied up there. Pollock are no longer seen at the wharf. Truckloads of dead fish have been taken from these pens because of rampant disease.

When in fallow the smell and fouled beaches disappear.

Increasing the boundaries will interfere with the lobster fishers who hold their lobsters in "cars" in this same area. The harbour waters will again be polluted by an industry that does not pay the full costs of operation, i.e., the cleanup of the pollution it creates.

Sincerely,
Jeanette Denton

Sent from my iPhone

The attached records were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse, and is not responsible for, the content of the attached records, including, but not limited to, the accuracy, reliability, or currency of the information contained in the attached records.

From: [Aquaculture Administrator](#)
To: [Aquaculture Administrator](#)
Subject: FW: ASF submissions for AQ# 0742, 0835, 1192, and 1205
Date: February 7, 2020 3:07:20 PM
Attachments: [Kelly Cove Salmon \(AQ 0742, AQ 1192, AQ 1205\) License Renewals - ASF Submission.pdf](#)
[image002.jpg](#)

From: Kris Hunter [REDACTED] >
Sent: February 7, 2020 2:56 PM
To: Aquaculture Administrator <aqua.admin@novascotia.ca>
Cc: [REDACTED]
[REDACTED]
Subject: ASF submissions for AQ# 0742, 0835, 1192, and 1205

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Hello,

Please find attached two submissions from the Atlantic Salmon Federation (ASF). The first submission is with regards to the public consultation on Kelly Cove Salmon's renewal applications for aquaculture sites #0742 at St. Mary's Bay in Digby County, #1192 at Shelburne Harbour in Shelburne County, and #1205 at Liverpool Bay in Queens County. The second submission is with regards to the public consultation on Ocean Trout Farms' renewal application for aquaculture site #0835 at Port Mouton in Queens County. If you have any questions or issues with our submissions then please do not hesitate to contact me.

Sincerely,
Kris Hunter

Program Director for Nova Scotia and Prince Edward Island
Atlantic Salmon Federation / Fédération du Saumon Atlantique



[REDACTED]
[REDACTED]

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Atlantic Salmon Federation
Fédération du Saumon Atlantique

Antigonish, Nova Scotia

February 7, 2020

Aquaculture Administrator
Nova Scotia Department of Fisheries and Aquaculture
1575 Lake Road
Shelburne, NS B0T 1W0

To Whom It May Concern:

I am writing on behalf of the Atlantic Salmon Federation (ASF) concerning the renewal applications by Kelly Cove Salmon Ltd. of their Aquaculture License and Lease #0742 at St. Mary's Bay in Digby County, #1192 at Shelburne Harbour in Shelburne County, and #1205 at Liverpool Bay in Queens County. We have several concerns and reservations about these proposed renewals which are impacts on wild Atlantic Salmon, lack of transparency in the renewal process, other proposed operations in the area of these renewals, unsuitability of the sites for open net-pen aquaculture, and timing in relation to other initiatives such as the new Fisheries Act.

Wild Atlantic Salmon – Atlantic Salmon are an iconic species of immense ecological importance. As an anadromous species and as a keystone predator they can be used as a proxy for ecological integrity and health. This importance is recognized by the Government of Nova Scotia and the Government of Canada in numerous policies and regulations including the decision criteria of the Nova Scotia Aquaculture License and Lease Regulations. Currently wild Atlantic Salmon populations in the Southern Uplands region of NS, which encompasses all three bays covered in these license renewal applications, are not doing well. The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) has recommended the Atlantic Salmon in this region be listed as endangered under the federal endangered species act. While this process is still ongoing, Fisheries and Oceans Canada (DFO) has been providing NS organizations in the Southern Uplands with significant funding to address Atlantic Salmon as a species at risk of extinction. Given the importance and status of wild Atlantic Salmon, industries that have significant negative impacts, such as the open net pen aquaculture industry, must be subject to intensive scrutiny and review during regulatory reviews like these license renewal applications. To our knowledge no effort has been made to ascertain the status or potential impacts on Atlantic Salmon in the bays and rivers adjacent to these renewal sites by either the proponent or by the government of NS. From our own affiliates and partners in the area there are small but significant wild Atlantic Salmon populations persist in the Mersey River (adjacent to AQ # 1205), and in the Meteghan and the Sissibo (adjacent to AQ# 0742). These struggling local populations represent a genetic diversity and islands of refuge for the broader Southern Uplands populations that cannot be lost without risking the overall loss of the species. On both the Mersey and the Meteghan there are active groups working to conserve protect these important remnant populations. There is an extensive body of scientific evidence that has clearly demonstrated that open-net pen aquaculture operations have a significant negative impact on wild Atlantic Salmon populations, including work by leading NS researchers. Aquaculture operations attract predators, are potential vectors for disease, affect the local water quality, and alter the biophysical and oceanographic conditions of the bays disrupting migrations. While the NS government is on record saying that they have the best aquaculture regulations in the world and this will allow for coexistence of wild Atlantic Salmon and open net pen aquaculture,

it is a fact that wherever open net pen Atlantic Salmon aquaculture operations and wild Atlantic have been collocated wild Atlantic Salmon populations have declined dramatically, regardless of the management or regulatory regime that has been put in place. It is therefore our opinion that these sites should not be renewed due to the potential threat that they pose to endangered wild Atlantic Salmon.

Lack of transparency - As is the unfortunate case with all aquaculture licensing and lease applications in Nova Scotia, there is a very limited amount of publicly available information on the company's proposed renewals for these sites. In fact, the only available information provided is within the context of proposed expansions of two of these sites (#0742 and #1205) outside of these renewal applications. Even this information does not provide details about the history of the sites and how the previous operation of the site impacted the local environment and biodiversity. This lack of information on site performance and negative impact makes a fair and independent evaluation of the potential risks and impacts associated with the renewal near impossible.

Without evidence to demonstrate that these sites are not causing negative impacts to the oceanographic and biophysical conditions in these bays, the precautionary approach dictates that a renewal should not be approved unless it can be demonstrated that the site did not have a significant negative impact on the local environment and fisheries in the area and that it is up to the proponent and the regulatory to provide this information. The precautionary approach is the standard that Fisheries and Oceans Canada has identified to which all fisheries and projects that potential impact fisheries should be managed. Therefore, there needs to be empirical evidence provided either by the proponent or by government to demonstrate that these sites have not been negatively impacting the oceanographic and biophysical characteristics of the public waters surrounding the aquacultural operation before it the site can be considered for renewal. If this information exists, then the government must release it under their recently announced commitment to transparency and to adhere to the spirit of public consultation process outlined in regulations. If this information does not exist, then the site renewal needs to be deferred.

Other aquaculture sites in the public waters surrounding the proposed aquacultural operations – Kelly Cove Salmon Ltd has applications before the Department of Fish and Aquaculture (NS DFA) to significantly expand the site (AQ# 0742) in St. Mary's Bay and to both expand the site (AQ# 1205) and add more sites (AQ# 1432 and AQ# 1433) in Liverpool Bay. These applications if successful will significantly change the scope and potentially impact of aquaculture operations on the oceanographic and biophysical conditions in these bays. From communications we have had with NS DFA these expansions/additions are triggering more extensive adjudicative application reviews that will address the impacts of these expansions and additions. However, to fully understand the potential impacts and cumulative effects that renewals will have on wild Atlantic Salmon and the oceanographic and biophysical conditions in these bays it is necessary to consider them in the context of these expansions/additions. Renewal decision criteria in section 3 of the NS Aquaculture License and Lease regulations indicates as much in line h). Given this inherent connection between these renewal applications and those more extensive adjudicative reviews, it is felt by ASF that the renewal decisions on these sites (AQ# 0742 and AQ# 1205) should be deferred until such time as the more thorough adjudicative reviews are complete.

Unsuitability of the sites - Without any new information being provided by either the proponent or the government, historical evidence must be utilized to determine the suitability of these sites for aquaculture operations. Sites operated by Kelly Cove Salmon, Ltd along the Atlantic Coast of NS have experienced super chill events in 2015 and in 2019 that resulted in large losses of the stocks held on site. The likelihood of this type of event reoccurring is quite high, especially given the exposure of these sites and the increase in extreme weather due to climate change as evidenced by the flash freeze events that have occurred the past few winters. For further proof that these events are not uncommon one only has to look at other aquaculture operations in NS in this region that have a similar exposure profile. Both Snow Island Salmon and Ocean Trout Farms, Inc. have similarly exposed sites and both experienced super chill events (2013, 2015) resulting in the loss of many thousands of salmon. This repeated loss at these exposed sites speaks to both the economic viability of these renewals and to the unsuitability of the oceanographic and biophysical characteristics of the bays along the Atlantic coast of Nova Scotia. As both criteria are listed in the regulations as factors that must be taken into consideration when making aquaculture application or renewal decisions it seems a foregone conclusion that these sites should not be renewed.

Timing of the renewal applications/approvals - ASF also has strong reservations about the timing of these renewals as there are numerous regulatory and policy changes that have occurred since original licensing or that are about to occur. These regulation and policy changes could significantly alter the conditions and requirements for finfish aquaculture operations in the area. As such ASF is firmly of the opinion that no finfish aquaculture site should be approved or renewed until such time the consequences of these new regulations and policies are clear.

Since the initial approval of these renewals the NS government has accepted the Doelle-Lahey Report calling for an overhaul of finfish aquaculture regulations in NS and imposed a 3-year moratorium on finfish aquaculture to develop new regulations and guidelines. As these sites were not originally vetted through this new lens, they should be required to go through that process as part of their renewal. At this time, it is unclear as to whether these sites renewals will be grandfathered in in perpetuity or eventually be referred to the newly established Aquaculture Review Board (ARB). This process needs to be communicated to the public prior to the review of any proposals (new sites or renewals). Even if these renewals are to be referred to the ARB it is unclear whether enough information has been collected and presented to evaluate this renewal. For instance, the new regulations require the establishment of go / no-go zones for aquaculture as well as the establishment of oceanographic and biophysical characteristics of the bay to determine its suitability to maintain aquacultural operations. It doesn't appear that this has occurred.

Other regulatory and policy developments are the now-official revisions to the Fisheries Act and the pending development of a new federal Aquaculture Act. The newly revised Fisheries Act has recently received royal assent, resulting in new policies and regulations that will be subsequently developed and implemented. Provisions within the new Act, along with these new policies and regulations could potentially impact aquaculture operations. In addition to the Fisheries Act changes, Fisheries and Oceans Canada (DFO) is developing a new federal Aquaculture Act, for regulating aspects of the aquaculture industry in Canada. The implications of these new Acts, policies, and regulations are not yet known, therefore any new application or renewal will potentially be impacted when these come into effect.

Given the threats posed to endangered wild Atlantic Salmon, the lack of new information associated with these renewals, the history of the adverse events at these sites, the likelihood of adverse conditions reoccurring, and regulatory changes, ASF is seriously concerned about the suitability of these locations for aquaculture operations. Therefore, ASF urges the Nova Scotia Department of Fisheries and Aquaculture to ensure that the best interests of Nova Scotians, optimum use of marine resources, and sustainability of wild salmon are represented and protected by denying these renewals.

Sincerely,

[REDACTED]
Kris Hunter
Director of NS and PEI Regional Programs
Atlantic Salmon Federation

[REDACTED]
[REDACTED]
About ASF:

The Atlantic Salmon Federation (ASF) is a world-leading science and advocacy organization dedicated to conserving and restoring wild Atlantic salmon. Domestically, ASF conducts research on wild salmon throughout the North Atlantic, performs complex river restoration projects and advocates for good environmental decisions. Internationally, ASF negotiates conservation agreements with commercial fishermen in places like Greenland and the Faroe and is represented at important forums such as the North Atlantic Salmon Conservation Organization and the International Council for the Exploration of the Sea. Headquartered in New Brunswick, Canada, ASF oversees a network of six state and provincial councils, and 103 affiliated groups. In Nova Scotia ASF works closely with its provincial council, the Nova Scotia Salmon Association (NSSA), and over two dozen affiliate groups. Altogether ASF represents more than 25,000 members and volunteers.

The attached records were submitted to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse, and is not responsible for, the content of the attached records, including but not limited to, the accuracy, reliability, or currency of the information contained in the attached records.

From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Fwd: Kelly Cove Applications
Date: February 5, 2020 12:06:53 PM

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Mary Dixon

[REDACTED]
Tiverton N.S.
[REDACTED]

I am writing to plead with you to stop expansion of fish farms in Nova Scotia. In particular I speak of those in the Westport harbour which is near my home. Expansion could further pollute the beach, shellfish and seaweed with sludge. I am uncertain what the sludge is? Is it salmon feces? Or uneaten salmon feed?

I am also concerned about lobster fishers in the area there are lobster cars in that area for storing lobsters before they go to market. Lobstering is a huge industry in our area and the biggest provider of employment I would not want to see lobster fishing jobs risked by expansion.

Whale watching and tourism are also important industries in our area. More salmon farms could potentially harm these industries as well.

The Kelly Cove farms in Westport currently employ two local people.

Please do not allow any further expansion of fish farms in Nova Scotia. Please investigate and invest in fish farming on land!!

Thank you,
sincerely,
Mary Dixon

Sent from my iPhone

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Kelly Cove Applications
Date: February 5, 2020 11:52:59 AM

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Thank you,
sincerely,
Mary Dixon

Sent from my iPhone

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Kelly Cove Salmon and Ocean Trout Farms, #AQ1205, #AQ0742, #AQ0835, #AQ1192
Date: February 6, 2020 9:07:20 AM

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Dear NS Dept of Aquaculture and Fisheries,

It is apparent now that farming fish in our ocean bays and harbours is a very bad idea. Now is also the time when you can decide to end the above leases.

I think it's a much better idea for all of us humans to change our eating habits, and if we want to eat fish, to eat more expensive, sustainable, healthy fish instead, than to further damage our bays and harbours.

We humans have done plenty enough damage to our oceans. Someone needs to give us a cease and desist order. There is no one but us to give that order, and it is now overdue to do just that.

Let us pledge to our precious grandchildren that we will do all we can to undo the harm we have done and are doing to our planet. Take that pledge with me.

sincerely,
Janet Shotwell

[REDACTED], Halifax, NS [REDACTED]

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From: [REDACTED]
To: [Aquaculture Administrator](#); [REDACTED]
Subject: Kelly/ Cooke renewal license for aquaculture at Westport site
Date: February 7, 2020 11:21:10 AM
Attachments: [Kelly Cooke License Renewal.pdf](#)

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Please read the attached letter.

Thank you,
Julie & Tim Long

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Live Well Community Church

[REDACTED] Tiddville
Digby County, Nova Scotia
Canada
[REDACTED]
[REDACTED]

February 7th, 2020

To: **Aquaculture Administrator**
Nova Scotia Department of Fisheries and Aquaculture
1575 Lake Road, Shelburne, NS B0T 1W0
Aqua.Admin@novascotia.ca

To the Aquaculture Administrator:

My wife, Julie, and I are writing this letter to officially state our position that the license for Cooke Aquaculture / Kelly Cove should not be renewed until there has been a thorough review of the current site at Westport, Nova Scotia.

I am a pastor of 2 churches in the area, Live Well Community Church and Tiverton Baptist, and I hear a lot of concerns not only from fishermen but from the community at large.

A common complaint I hear is the space the cages take up in the harbour, and they do not have adequate lighting to show up in all weather conditions. Boats have run into the cages and I am concerned there will be damage done to either fishing boats or the cages themselves.

Another complaint is the amount of slime and oils that wash up on the shorelines. The fishermen and local residents have been unable to obtain an answer as to what the residue actually is and if it is harmful. Also, some of the equipment/ cage housing has come apart and washed up on shores as far away as in the Meteghan area. I have to wonder about the integrity of the cage structure when this happens and if fish have escaped. Again, no one seems to be able to get this information.

A particularly disturbing comment has been that some of the staff have made comments to various locals that the salmon are not edible and that they wouldn't feed it to their animals. The fishermen had asked the company workers if they could have the remains of the fish after processing was complete. The response was that the fish wasn't fit.

The last concern, and perhaps the most important, is the extent of the "dead zone" under and around the current cages. Divers have described the bottom as looking like the moon- completely dead. Fishermen have said the lobsters from in the vicinity do not smell or look the same, even when cooked. Since this is a continual site and there is no "rest" period for the ocean floor to recover, the size of the affected area continues to get larger.

The attached reports were submitted by third parties to the Department of Fisheries and Aquaculture and the Department of Environment and Planning. The Department does not endorse, and is not responsible for, the content of the attached records, including but not limited to, the accuracy, reliability, and completeness of the information contained in the attached records.

Although I have no personal first hand knowledge of the concerns I have brought forth, they are very real concerns of people who share their feelings with me. We have a few suggestions we would like to see prior to blindly renewing the license at this site:

1. Have an independent diver come and assess the ocean floor and the damage that has been done so as to determine the amount of further damage that will occur with ongoing and/or increased farming at this site;
2. Hold 3 public information sessions (Meteghan, Sandy Cove, Tiverton/ Westport) so that fishermen and locals can feel their concerns are being heard, which is extremely important;
3. Have an independent company identify what the substance is that washes up on the shorelines to determine if it is dangerous, especially to humans and other wildlife; and
4. If the license is renewed against the wishes of the community at large, then the cages need to be better lit and the public needs to be notified of any damage to the cages, especially after storms.

I have also attached a letter, which is being presented to [REDACTED] of Cerman today at the Digby Neck Firehall meeting at 2:00. It further explains concerns we have regarding an increased presence of aquaculture in our waters. We are of the opinion that the Province of Nova Scotia should follow the direction Prime Minister Justin Trudeau has regarding open-pen aquaculture on our coastlines, and that it be banned the same as what is occurring in British Columbia. On land aquaculture has already been proven successful and less toxic to the surrounding environment.

Thank you for reading this letter.

Sincerely,

Reverend Tim and Mrs. Julie Long
Live Well Community Church
www.livewell.church

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Live Well Community Church
Tiddville
Digby County, Nova Scotia
Canada

February 7th, 2020

To:
Cermaq Group AS

Attention: [redacted], Sustainable Development Director Cermaq Canada

Dear Cermaq:

My wife, Julie, and I are writing this letter to officially state our position that Cermaq should not establish either open-pen or experimental "closed-containment" fish farms in St. Mary's Bay.

We recognize you are a global fish farming organization with much experience and a sincere desire to minimize harm to environments in direct vicinity of your farms. During the afternoon community meeting at the Digby Fire Hall on January 15th, when asked if you had experience farming in waters with our level of tidal activity, you stated publicly you do not. Our Bays are unique. The tidal range in our area is approximately 13 metres (43 feet). The worldwide average is about one metre. The currents around Long Island and Brier Island are severe and have proven deadly.

Our understanding of your presentation is that you plan to place four such pens in the Bay and actively use 2 while the other 2 rest to recover the ocean floor- to recover the "dead zone". Given the severity of our tidal power, there is absolutely no way you will be able to contain to one area the feed, feces, chemicals, pesticides, and whatever else you may find necessary to use during the growth of the salmon. All of these substances will wash up along the shoreline of our Bay just as they do with the current salmon cages in the Grand Passage, but only on a larger scale due to the size of your proposed operation.

We understand your company performs research on how to best treat conditions related to salmon farming, such as sea lice, algae blooms and infectious salmon anemia, and that you do your best to try to prevent them in the first place. However, we are all but human and we are not perfect. For most of human history, we have tried to harness nature to use it for our purposes, and we have failed. Nature needs to be respected for its power and its beauty.

The conditions in this Bay are anything but consistent for farming. During our full moons and highest tides, the tidal range exceeds 40ft. And if there happens to be a gale, which in our area winds regularly exceed 100km/hr, traps are entangled, land and ocean structures are destroyed, and it is deadly to ask

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any worker to go on the water during these times. If the storms aren't bad enough, the swells in the Bay can top 20-30ft. You will not be able to perform any consistent farming or research under these conditions. There are simply too many variables.

What you can rely on, however, is the 100s of years of research our fishermen have under their belts. Long before our fisher-men and -women had sonars, fuel engines, and motorized winches, their fathers, grandfathers, great-grandfathers (and so on) looked to the skies, watched the wildlife, listened to their surroundings, and knew every white cap, swell and ocean movement. They were instinctual, and if they were wrong, someone died. Not fish... people.

Cermaq needs to understand that when you "threaten" the waters on which these fishermen make a living, you are virtually threatening the very nature of these men and women. Hundreds of years of inherited knowledge is part of who they are. They still fish instinctively. We are not afraid of change or progress- we embrace it when it makes sense. After all, we do have fuel engines, mechanical winches and sonar. What we are not okay with is RISK, especially with a company who has no experience fish farming in our tidal waters.

Despite reports that the lobster industry is thriving, St. Mary's Bay is not. You need only Google lobster landings and St. Mary's Bay to read about it. We will not allow this Bay to be put under any more stress. It can not sustain it.

We know that Cermaq has many, many years of fish farming experience. Even with all this experience, you are not without problems. In 2019 alone, you experienced algae blooms in both British Columbia and Northern Norway. In Norway, it was described as an "acute situation". You also now find yourselves being asked to leave BC waters by 2025. Our Federal Government does not support open fish farms along Canada's coastal waters and wants to see them banned. We will be pushing our Province to follow suite. There have been many successful on-land fish farming sites around the world.

In 2019, not only did Cermaq struggle with algae blooms, you also had an incident of ISA (infectious salmon anemia) at the Chilean site. Prior to this, in 2016 there was another algae bloom in Chile, which caused many fish to die. Also, before the 2019 algae bloom in British Columbia, you had previously battled sea lice for 2 years.

You have also stated you want to be transparent. Yet, during the recent Canadian algae bloom when asked about the number of deaths, Andrew Nikiforuk wrote: "*The Tye asked Cermaq on Tuesday to confirm the number of fish killed by the bloom but Cermaq said it won't release the numbers for "commercial reasons"* If you were in our Bay, and so much as one fish died, we would demand to know about it and what caused its death.

You may be doing your very best, but you will always have problems. We are not willing to RISK our Bay. If you were in our Bay and developed algae blooms, there is no way you could contain it, even with algae skirting. Just look at the previous description of the tides, currents and waves in our Bay. Neither the netting nor the topside of your cages are any match for these weather conditions.

We are not insensitive to global food insecurity. As humans we need to look toward the future and prepare for food shortages. Having said this, as a pastor of 2 small churches in the area, I see food insecurity and hunger every day. Yes, we need to prepare for the future, but we also need to acknowledge the today. We recently received a grant from the Province to establish a sustainable food

box program for seniors who are hungry in their homes. We have called it **CONNECTCare Boxes**. We have also made this program available to the disabled, sick and poor.

The health of St. Mary's Bay has a direct impact on our ability to put food on tables, and we will do everything we can to protect it. If you look around the room at each of your meetings, you will see the faces of people who want to put food on our tables. We need them to stop worrying about how to stop you from coming here and disrupting our food supply and our economic ability to provide for our community.

We can discuss research papers for and against salmon farms for years. But at the end of the day, it is fundamentally **WRONG** for Cermaq to bring fish farms to our Bay when the vast majority of the public are so openly against it.

We are asking you to make the decision **TODAY** to not put fish farms in St. Mary's Bay

We have listed so many reasons why your farms and our Bay are not a good fit. Please respect us enough to understand that we know what we are talking about. Our fishermen are the experts in this particular instance.

Respectfully written to you,

Reverend Tim & Mrs. Julie Long
Live Well Community Church
www.livewell.church

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Lease extension in Grande Passage site 0742
Date: February 7, 2020 8:08:26 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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To whom it may concern,

I am the local municipal councillor I am trusted to represent the community in any matter they deem fit. As well I live in a water front home on the Freeport side of Grande Passage and have worked in the local lobster industry.

In the last few months I have received dozens upon dozens of letters and phone calls in regards to the public's opposition to the current proposed expansion of the Salmon Cage industry in the Saint Mary's Bay. I have received letters of opposition from the Villages of Westport, Freeport and Tiverton. One of the driving factors in such strong opposition to the expansion of the Salmon industry in the Saint Mary's Bay is due to the local experience with the Salmon cage Lease site 0742 in Grande Passage.

As the Municipal Councillor I can attest to the near universal opposition to the current Salmon Cage operation located in Grande Passage. I have never heard a single Islander voice support for the Grande Passage Salmon cage in the past ten years either publicly or in private.

The local villages were subject to a SLAPP (Strategic Lawsuit Against Public Participation) by Kelly Cove/Cooke's. Cooke's made frequent promises for local processing and employment which never occurred. The area of the harbour the current lease sits on is very shallow and has poor tidal circulation. As well according to local knowledge the harbour has been coated in S--t and the Lobster caught in the harbour have a foul taste and smell. I would point to studies that back up local knowledge but in my opinion the Province has been very careful to take a "what we don't know can't hurt us" attitude to aquaculture, and as a result there have been inadequate science.

The relationship between the Salmon cages of Kelly Cove/Cooke's and the surrounding community can be described at best, as mutual contempt or at worse, open hatred. The community does not trust Kelly Cove/Cooke's and they wish that they would leave.

I would like to point out that the relationship with the Salmon Cages in Grande Passage did not start poorly. Islanders took a wait and see approach. After seeing the impact the Grande Passage Salmon Cages had upon the harbour and in seeing how poorly the industry kept its promises we Islanders decided we don't like the pollution and we didn't like the industry itself. We would like for them to stop casting a shadow on our communities and go away.

This aquaculture site and its owners earned their reputation.

Just yesterday it came to my attention that there was an application to extend the Salmon farm lease located in Grande Passage and that the deadline for comments was less than 24 hours away. So here I am rushing a letter just a couple hours from the deadline to try and communicate the depth at which we do not want this lease extended. The fact that I an elected official, who is currently involved in the fight against open net Salmon feedlots, had no idea about this lease extension until it was almost too late to comment says a great deal about this process. This attempt to extend the lease for the Grand Passage site almost slipped under the radar without a chance for the local impacted community to have its say.

You sitting on the board who are to determine our fate might I suggest that the province first prove that Salmon cages can safely co-exist with the Lobster industry. That has not happened and according to local knowledge they are not safe to have near lobstering grounds. I trust my friends to know whats happening in our Harbour better than any expert sitting in Halifax. Tell the province that local knowledge has worth and side on the side of precaution and do not extend this lease.

If you have any questions of me or about the above letter you may contact me at,

David Tudor

[REDACTED]

Freeport Nova Scotia

[REDACTED]

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: lease renewal
Date: February 7, 2020 8:56:07 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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Nova Scotia Department
of Fisheries and Aquaculture

RE: Lease Renewal (St. Mary's Bay AQ#0742)

I reside in Nova Scotia along the shore of St. Mary's Bay. Understanding the economic dependence of our province on the lobster industry and because of my deep concern for the life of the oceans I am compelled to express this to you.

Fin-fish aquaculture is incompatible with local marine life and the lobster industry. As well, it brings few or no benefits to local communities.

The fish at the Kelly Cove site are owned, processed and sold outside of NS and most of the money goes to NB. Meanwhile the 'poop' from the hundreds of thousands of salmon does not. It ends up on the floor of the Bay. Apparently, unlike me and the local inhabitants who cannot toss our 'business' (feces) into the bay the Cooke business can. Tides, storms, ocean currents are not selective in what they move around in the water and onto the shorelines. Thousands of kilos of salmon feces included.

Research shows that dead zones form around aquaculture pens and also that numbers of market size lobster diminish significantly.

The more our oceans / waters are handed over, privatized and polluted by multi-national corporations the more our quality of life, the life of the Bay, and the economic stability of the NS lobster industry is in peril.

Think long-term. Think of what you leave for your grandchildren's grandchildren.

Please acknowledge these concerns and duly consider them in review of lease # 0742.

M. L. Ouellette

[REDACTED]
Grosses Coques, NS

[REDACTED]
Mailing address: M.L. Ouellette

[REDACTED]
Church Pt., NS, Canada

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submitted by third parties to the Department of Fisheries and Aquaculture
for processing. The Department does not endorse, and is not responsible for,
the accuracy, reliability,
or currency of the information contained in the attached records.

From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: OPPOSITION
Date: February 6, 2020 1:45:32 PM
Attachments: [Katherine Feiel.docx](#)

** EXTERNAL EMAIL / COURRIEL EXTERNE **

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Attached please find a letter of opposition to the proposed expansion in Westport harbour as well as overall opposition to the proposals by Cermaq Canada

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Katherine Feiel
[REDACTED]
Freeport, Nova Scotia
[REDACTED]

[REDACTED]
February 5, 2020

To whom it May Concern:

I am writing to express my opposition to expansion of fish farms in Nova Scotian waters. This particular letter refers to both the Kelly Coves application to expand in Westport harbour and applications made by Cermaq Canada to introduce industrial scale feedlots in various locations around the province.

With regard to both Westport Harbour and the other locations I am concerned with the following: further congestion of the harbour and waterways; pollution and sludge on beaches, shellfish and seaweed; more risk of whale entanglements (particularly the already endangered North American Right Whale); increased untreated fish feces and release of feed and lice treatments; debris collecting on beaches; displacement of lobster cars (used to hold lobster in the ocean for market); navigational difficulties (in particular the coast guard which has a station on Brier Island).

Eco-Tourism is a major summer industry of this province. It employs many residents and visitors appreciate Nova Scotia's whales, hiking trails, lobsters, and empty coastlines. I wonder how Nova Scotia's \$2.61b (2018) tourism industry will be affected by industrial scale salmon feedlots in iconic locations like Mahone Bay, Lunenburg, Saint Mary's Bay, and Brier Island harbour? Are impacts to tourism not something the provincial government is considering? It seems as if our politicians are not thinking long term, but rather looking for a fast cash infusion without considering the inevitable risks.

Our winter industry is Lobster fishing. District 33/34 has huge landings, with the Nova Scotian lobster industry being worth over \$500 million. Again, Tourism Nova Scotia uses this industry to promote Nova Scotia as a destination. Expansion in Westport Harbour, Saint Mary's Bay, Liverpool Bay, Mahone Bay and elsewhere in the province will displace some fishers, creating congestion in other areas and putting an overall strain on the industry. Will visitors to the province wish to see the quality of their seafood products diminish?

Other considerations include: What is the effect of industrial scale fish feces released untreated in the water? How does it affect other marine life? How is feed monitored to ensure it is not released in the open water? What are effects of sea lice treatments on other species? Will these changes to the ocean environment affect lobster quality? These are questions which need to be answered but it seems there are no clear answers.

It appears that not all promised jobs materialize. The lobster industry provides middle class salaries in coastal areas with little potential for comparable earnings in the aquaculture industry. The lobster and tourism industries employ thousands province wide. It seems that the promise of a few aquaculture jobs is not worth the potential risk to the tourism and lobster industries, economies of coastal communities, and the ocean environment.

Nova Scotians are disgusted that the Aquaculture Review Board has given us little time to comment and that it seems that industry is given preferential treatment over communities and residents of this province. There has also been no forthcoming communication from the offices of the Ministers of Fisheries and the Environment with regard to these proposals. It seems that the concerns of constituents do not matter in this province, preference appears to be given to large corporations.

Regards

Katherine Feiel

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Renewal of the license/lease 0742
Date: February 6, 2020 1:03:27 PM
Attachments: [image003.jpg](#)
[cooke_plan_3.jpg](#)

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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Aquaculture Administrator
Nova Scotia Department of Fisheries and Aquaculture
Dear Sir/Madame,

I'm writing from Freeport, Nova Scotia in opposition to renewal of lease:
AQ#0742

Kelly Cove Salmon Ltd.

St. Mary's Bay, Digby County (Grand Passage – near Westport)

Atlantic salmon and Rainbow trout

Based on review of the 1.52 hectare lease boundaries, an aerial image of existing use, and the boundary amendment application it appears that Kelly Cove Salmon Ltd. may be in violation of their existing lease boundaries. Please see attached figure where it appears that 8 pens are crammed into an area close to the existing lease. I expect that the moorings extend outward from the existing lease area.

Prior to consideration of any renewal, public consultation is required regarding the past decade of operations, existing use (including an as laid figure), and planned future use of the site.

Furthermore, stated public opinion of this site is quite negative, including claims of beach fouling, dead zones, and limited economic benefit. The oceanographic (flushing) conditions do not seem suitable for the 8 pens operated at this location, with associated risks to the marine ecosystem, including potential spread of disease to wild salmon and other fish.

In general, I recommended an evaluation on how well (or if) this location, and others managed by Kelly Cove Salmon and/or Cooke Aquaculture adhere to the 4 pillars for aquaculture development laid out in Nova Scotia's Aquaculture Strategy.

In my opinion, if an expansion beyond existing lease boundaries has occurred, the first 3 are not upheld.

%%%

1) Farming Responsibly

8 commercial pens require a larger space than 1.5 hectares. The existing lease size is more appropriate to a research/test location, or community-scale aquaculture operation. Negative impacts with the existing operations at AQ#0742 have been observed by local residents on the adjacent beaches, with associated risks to the marine ecosystem, including wild salmon and other fish.

2) Aquaculture Engagement

The community is not informed of existing operations, or future plans. There is currently a lot of confusion related to the proposed 1.5 hectare renewal, the requested boundary amendment to 11 hectares (2016), and existing use of space.

3) Regulatory Safeguards

Based on the 2016 boundary amendment request, including the following text,

“A boundary amendment application is being filed to fully encompass existing occupation including all cages, mooring lines and anchors.”

it appears that regulators may be aware of mooring lines and anchors outside of the lease area.

Based on publicly available information, it seems likely that an expansion has already occurred.

There are currently more, and larger, pens present than the initial build. With the pens occupying,

and drifting from, the existing lease space. A figure showing the existing operations, including mooring lines and anchors is required.

In connection with Farming Responsibility, a 1.5 hectare lease is not appropriate for 8 commercial pens. To demonstrate regulatory safeguards are in place, in my opinion, if the operation exceeds the current 1.5 hectare lease there should be a fine, followed by requirement to scale back to fit within existing lease boundaries, or removal.

4) Jobs and the Economy

There are a couple of valued local jobs, and I feel bad writing in opposition due to them. However, a sustainable operation can not stand on a couple jobs alone.

%%%

I hope that the review process takes this information into account, and provides a public update on the existing operations at AQ#0742. After which, we will be better informed to comment on the future of this and other open pen salmon sites throughout Nova Scotia.

Best regards,

Greg Trowse

[Redacted address]

Freeport, Nova Scotia

[Redacted address]

Gregory Trowse, P.Eng.

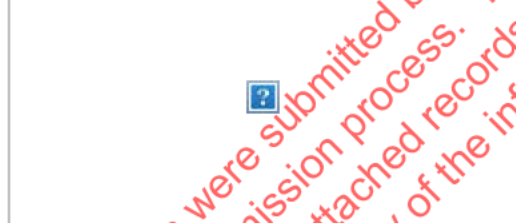
Director

SOAR – Sustainable Oceans Applied Research Ltd.

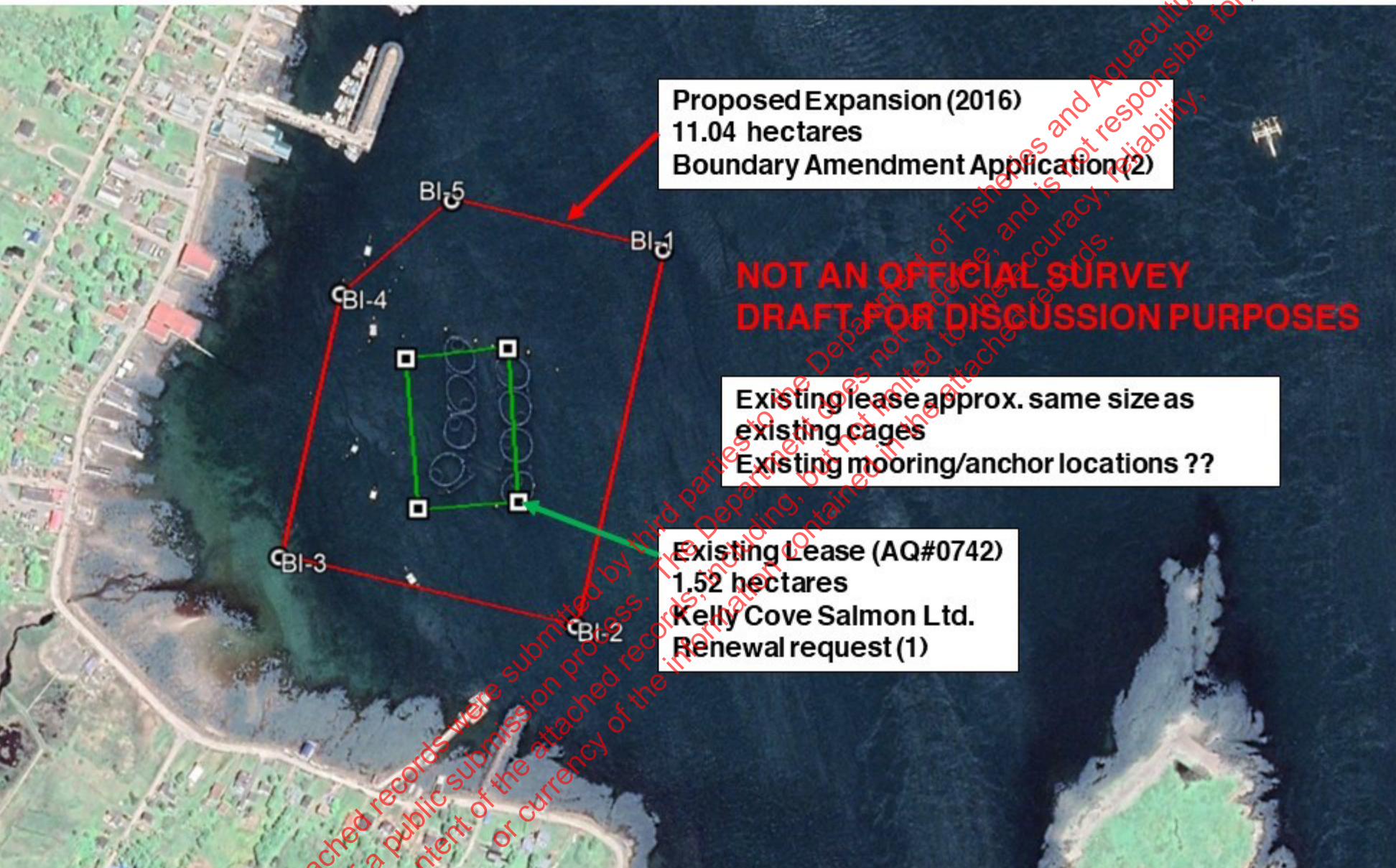
[Redacted contact information]

~ Innovations with coastal communities and transformational technologies for a sustainable future

soar email



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Proposed Expansion (2016)
11.04 hectares
Boundary Amendment Application (2)

NOT AN OFFICIAL SURVEY
DRAFT FOR DISCUSSION PURPOSES

Existing lease approx. same size as
existing cages
Existing mooring/anchor locations ??

Existing Lease (AQ#0742)
1.52 hectares
Kelly Cove Salmon Ltd.
Renewal request (1)

- https://novascotia.ca/fish/aquaculture/public-information/public-notice/Administrative_Hearing-AQ_0742-2020.01.09.pdf

- https://novascotia.ca/fish/aquaculture/KCS_0742.pdf

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Cc: [REDACTED]
Subject: ST. MARY'S BAY, (Kelly Cove Salmon Ltd.) - AQ#0742
Date: February 7, 2020 6:59:07 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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To whom it may concern,

As a permanent and resident of Sandy Cove, Digby Neck and property owner whose family has lived in this village since 1784 I feel I have a right, and a duty to speak on this matter. I understand the economic value that our local fishing industry represents, particularly the Lobster industry. As a part owner and manager of a locally based Social Enterprise Café located here I am keenly aware of the value of tourism to our area, and the overall value of tourism in our area as it contributes to the overall tourism industry in Nova Scotia.

The optimum use of marine resources:

I do not believe that open-pen fin-fish aquaculture is in any way compatible with our traditional local marine resource uses such as lobster fishing, clamming, shell fish culturing, recreational boating or use of the nearby beaches. Extensive research by independent studies has shown this industry to pollute the waters while offering little or no economic benefits to local communities. Additionally, it threatens to displace a large number of fishers and others employed in our traditional fishing industry.

The contribution of the proposed operation to community and Provincial economic development:

In fact it has been shown that jobs in the fin-fish aquaculture industry are very limited. Jobs, in the numbers promised by Cooke/Kelly Cove, never materialized. Statistics show that the number of direct, full-time, permanent jobs in this industry throughout Nova Scotia have declined, and this is certainly evident in our area. Further automation in the feeding process will only result in fewer of these jobs. The wages for these non-specialized staff members are low, the work on the water is dangerous and lay-offs frequent. Cooke (Kelly Cove) aquaculture sites often use mainly New Brunswick specialized personnel, vessels and trucks to ship all of the fish for processing back to NB, so there is very little economic gain for local communities or for Nova Scotia.

The other users of the public waters surrounding the proposed aquaculture operation:

The waters that surround this site are used by lobster and bait fishers, recreational boaters, tourists, divers, and wildlife including whales, dolphins and wild migrating juvenile Atlantic Salmon. The reduction of area available to our lobster fishers threatens the very livelihood of the local community. The ensuing pollution spoils our waters and fishing grounds with large amounts of fecal matter and other harmful contaminants and our shores with sludge and discarded, and broken pieces of pen infrastructure. The more our ocean resources are handed

over, privatized and polluted by these multinational companies the more our quality of life and economic stability is threatened.

Gwen Wilson

[REDACTED]

Sandy Cove, Digby Neck
NS [REDACTED]

[REDACTED]

CC Gordon Wilson, MLA, Minister of Environment
CC Chris D'Entremont, MP

Gwen Wilson

[REDACTED]

Sandy Cove, Digby Neck

[REDACTED]

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From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Westport Harbor
Date: February 7, 2020 3:19:48 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

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Julie Akers

[REDACTED] Amherstburg, ON [REDACTED]

Hello, I am against the boundary changes of the pens in Westport Harbor. Not only will it affect the environment, it will also affect the jobs of those who live and work in the area.

Thank you for your consideration

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