

**NOVA SCOTIA AQUACULTURE REVIEW BOARD**

IN THE MATTER OF: *Fisheries and Coastal Resources Act, SNS 1996, c 25*

- and -

NSARB-2025-001: Public Hearing on Application for Boundary Amendment for Marine Finfish Licence/Lease AQ#0814x and New Marine Finfish Licence/Lease AQ#1430 and AQ#1431, WFN Fish Farm Limited Partnership, Whycomomagh Bay, Inverness County, Nova Scotia (the "**Application**")

Affidavit of Melissa Rommens affirmed on February 19, 2026

I affirm and give evidence as follows:

1. I am Melissa Rommens, of Emyvale, Prince Edward Island.
2. I have personal knowledge of the evidence affirmed in this Affidavit except where otherwise stated to be based on information and belief.
3. I state, in this Affidavit, the source of any information that is not based on my own personal knowledge, and I state my belief of the source.

Professional Background

4. I am the principal of Sustain Aqua, and have provided technical advice, regulatory and certification advice, training, and writing services for the aquaculture industry for more than twenty years.
5. I hold a Bachelor of Science (Honours) (1993) and a Master of Science in Biology (1997), both from the University of New Brunswick, and am formally educated in the science of aquaculture. I have commercial aquaculture experience in technical roles, R&D and management of operations. I have worked as a consultant to educational institutions, the Nova Scotia Department of Fisheries and Aquaculture ("**DFA**") as well as industry players in both the finfish and shellfish aquaculture sectors. A true copy of my CV is attached as **Exhibit A**.

6. I have a strong understanding of the Fisheries and Coastal Resources Act, Aquaculture Licence and Lease Regulations, Aquaculture Management Regulations, Fisheries (General) Regulations and Aquaculture Activities Regulations as they apply to aquaculture. Using this regulatory familiarity, practical hands-on experience and accrued scientific knowledge, I have developed and taught best management practices for aquaculture and coached Atlantic Canadian finfish and shellfish companies to BAP and organic certification.

Retained by WFN in 2018

7. My role with WFN Fish Farm Limited Partnership (“**WFN**”) is as a biologist, providing science advice for farm operations, farm regulatory compliance and farm certification development. This is an ongoing consultancy position.
8. I have supported WFN since 2018, when Donald Davis approached me to help develop the Farm Management Plan (“**FMP**”) for WFN’s trout aquaculture operation in Whycomomagh Bay (the “**Farm**”). At that time, new Aquaculture Management Regulations required every licensed aquaculture site in Nova Scotia to have an approved, comprehensive farm management plan.
9. I have been directly involved in describing WFN’s fish production protocols through creation and updates to the FMP. Much of the foundational work—biosecurity procedures, mortality response, health monitoring, and environmental integration—is embedded in that FMP.

WFN’s Farm Management Plan

10. The FMP is the Farm’s operational manual. Developing the FMP involved creating an extensive set of Standard Operating Procedures (SOPs), record templates, and explanatory materials describing how the farm meets each regulatory requirement. I continue to update and revise the FMP to ensure it remains accurate and aligned with current farm practices. The full FMP and associated SOPs now exceed 300 pages, covering fish health, containment, environmental monitoring, and general operations. DFA has approved WFN’s FMP for implementation.
11. WFN’s Development Plans, filed in support of this Application (NSARB-2025-001 Exhibits #004a and 004b), outline several aspects of future operations, including harvest biomass

up to 56,000 fish per cage, continued use of triploid stocks if performance remains strong, seasonal feeding windows, and installation of oxygen supplementation systems.

Uniqueness of Whycomomagh Bay

12. Historically, trout were grown at sites 0814, 0845, and 0600 in the “inner bay” of Whycomomagh Bay during spring, summer, and fall. In this Application, WFN seeks to amalgamate sites 0814, 0845, and 0600 into site 0814x.
13. WFN’s original aquaculture sites (0814, 0845, 0600) are located in a depositional area where high feeding levels required for viable commercial production are not environmentally sustainable. That reality is central to understanding why WFN needs the outer bay sites on the North and South sides of the larger bay area, being 1430 (North Aberdeen) and 1431 (South Aberdeen).
14. Sites 1430 (North Aberdeen) and 1431 (South Aberdeen) overlap with WFN’s experimental sites 5010 and 5013, respectively. A map of Whycomomagh Bay identifying sites 0814x, 5010 and 5013 is attached as **Exhibit B**.
15. A Google Map image of Whycomomagh Bay identifying sites 0814, 1430 and 1431 as well as WFN’s processing facility is attached as **Exhibit C**.
16. The three sites (0814x, 1430, 1431) work in tandem with each other and are managed collectively as a single integrated farm. The movement of fish between these three sites is an essential part of managing both environmental conditions and fish health. I have helped develop and refine the production schedule over the years. The goal is to ensure that each phase of the fish’s lifecycle occurs in the area best suited for that particular activity.
17. Fish are moved for several reasons:
 - (a) To maximize growth at the sites with optimal biophysical conditions;
 - (b) To keep cages out of the path of seasonal ice movement; and
 - (c) To maintain winter accessibility to the cages when the lake freezes.

18. A primary concern in finfish aquaculture is the accumulation of organic materials - waste feed, feces, and biofouling - on the seabed. This organic matter must break down without degrading benthic communities.
19. Site 0814x cannot support high feeding levels but is naturally sheltered. It can support lower feeding levels and is used for low fish biomasses.
20. Site 0814x has low currents, limited flushing, and a naturally deep, anoxic basin. Historical farming and modelling both indicate limited assimilative capacity. WFN responded to this by capping fed-fish biomass at 200 MT, significantly lower than historic levels, and this mitigation has been accepted by DFA. The site functions well for nursery fish because of the low biomass for feeding and winter holding because no feeding occurs, limiting deposition.
21. The overwintering area is protected from moving ice because it is in the lee of the island, and accessible from shore, allows safe winter access and eliminates exposure to moving ice. Site 0814x is therefore intended to be used as a nursery for small fish (low biomass and low feeding) and for holding fish over winter (when feeding does not occur), including fish from the seasonal production sites 1430 and 1431.
22. By contrast, reported modelling and farming experience suggest that sites 1430 and 1431 can assimilate higher levels of organic deposition due to higher energy environments and increased flushing. These sites are therefore designated as the primary production sites because they best suited for feeding and biomass growth.
23. The seasonal production sites (1430 and 1431) are the locations where most of the fish growth and activity will occur. Previous farming experience and reported modelling show they can support higher a larger tonnage of fish production. However, winter ice makes them inaccessible and exposes them to destructive ice movement in spring.
24. Because rainbow trout require more than a year – and often more than 18 months- to reach market size, WFN must grow each year class through at least one winter.
25. Whycomagh Bay ices over in the winter, typically starting in early January and staying frozen until mid March. Satellites pictures of Whycomagh Bay show significant movement of ice in the spring with flow in a southwest to northeast direction, presumably leaving Whycomagh Bay on its northeast end through the Little Narrows channel.

26. The moving ice is very powerful and can crush or slice any exposed infrastructure in its path. Fish cages in the path of the ice flow are at risk of damage. In the winter, the cages become surrounded by ice so those located away from shore are not accessible for care. Therefore, cages must be moved prior to ice formation to a protected area to protect from damage during the spring ice flow and to enable access in the winter.
27. This makes the movement of cages into the ice-protected 0814x overwintering location essential. All cages from 1430, 1431, and the production area of 0814x are moved to the overwintering location in early winter, then distributed back to the production sites once the ice retreats in spring. This fish are moved while in their cages by tethering an entire cage to a boat with a specially designed bridle system and slowly pulling it. This is repeated for each cage of fish.
28. This seasonal use of sites and movement of cages is the current process used by WFN for their current experimental finfish aquaculture sites which overlap the commercial sites requested in this Application and has proven effective.

The Stocking Cycle & Production Plan

29. The annual stocking cycle for a single year class typically proceeds as follows:
 - (a) In the fall of Year 0, small fish (about 100 g) arrive from the hatchery. They are held and grown in the nursery grid at 0814x, then moved into the overwintering location for winter.
 - (b) In spring of Year 1, these fish are moved to site 1430 for feeding and growth.
 - (c) Larger small fish (150 g+) of the same year class arrive from the hatchery in spring of Year 1 and are placed in the same grid at 1430.
 - (d) In early winter of Year 1, the entire year class is moved to the overwintering location at 0814x.
 - (e) In spring of Year 2, the year class moves to site 1431 to complete growth to market size. Harvest begins in the fall of Year 2 but cannot be completed before winter.
 - (f) Some market-size fish are therefore moved back to the overwintering location at 0814x, where harvest continues until the year class is removed.

30. Year classes are rotated continuously to maintain uninterrupted production.
31. WFN's production plan for 2026-2029 is illustrated in **Exhibit D**.

WFN's Mitigation Efforts

32. WFN uses a suite of mitigation strategies to reduce the Farm's environmental impacts:
 - (a) **Extended fallowing:** Each commercial site (1430 and 1431) will have two cage arrays; only one will operate per year, giving each array at least 15 months of fallow time.
 - (b) **Improved cage orientation:** The commercial configuration at 1430 will allow cages to be oriented parallel to the shoreline and positioned in deeper water.
 - (c) **Improved feeding accuracy:** Feed barges with high-quality underwater cameras have improved feeding efficiency. Observing the fish underwater during feeding allows control of the feed rate according to feeding activity, including stopping when the fish give cues that they are satiated. Historically, environmental monitoring detected feed in the benthic mud; more recent monitoring shows a reduction.
 - (d) **Real-time monitoring:** Since 2025, probes measuring oxygen and temperature inside and outside cages have been deployed. These help feeders adjust feeding based on environmental conditions.
 - (e) **Enhanced biofouling management:** Net washing is now conducted weekly during the summer, and grid cleaning occurs more frequently to reduce biofouling build up. Reducing biofouling reduces the amount of organic material falling to the bottom. An additional net washer was available for use in 2025.

Fish Health

33. The sites in this application have a strong history of supporting high-quality steelhead growth. The 0814x site may be one of the longest-running finfish aquaculture locations in Nova Scotia.

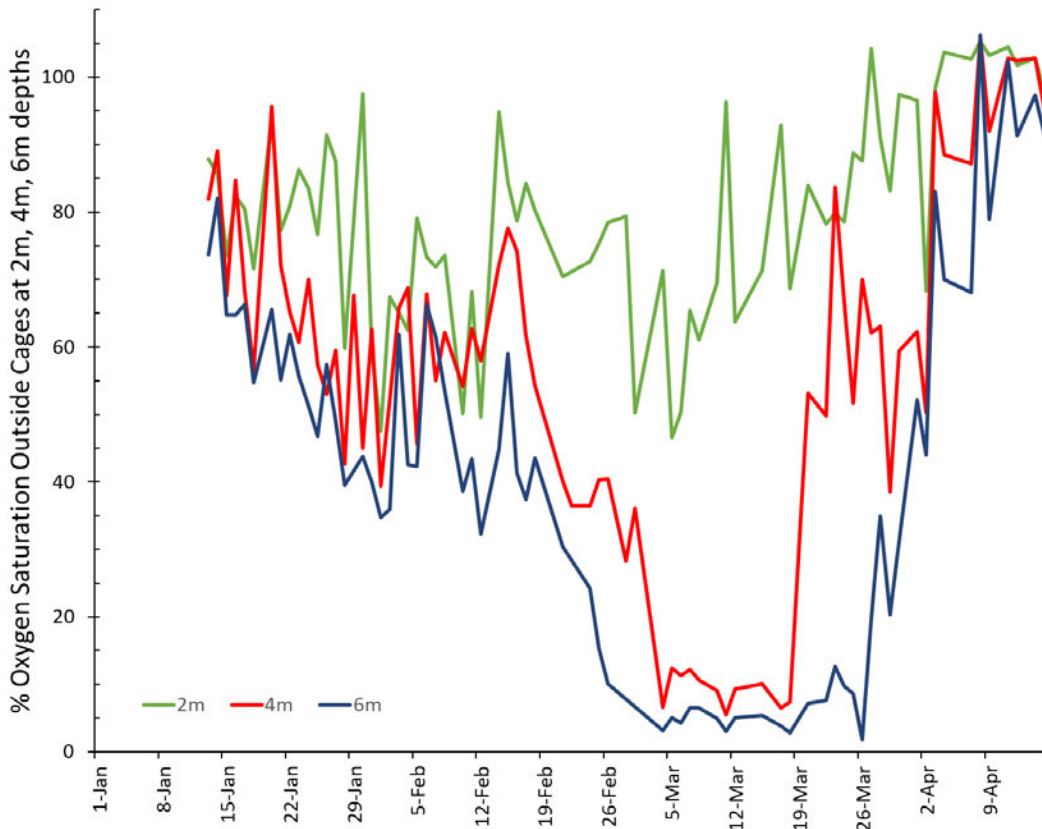
34. While seasonal challenges such as winter ice movement, persistent oxycline and elevated summer temperatures must be managed, the sites offer important fish health advantages including:
- (a) Low salinity conditions (approximately two-thirds seawater strength) in this area of the Bras d'Or Lake significantly reduce disease risk, particularly sea lice pressure.
 - (b) Reduced salinity also lowers osmotic stress, allowing fish to maintain homeostasis with less energy expenditure.
 - (c) The geographic isolation of the sites from other salmonid farms further reduces biosecurity and disease transmission risks.
35. The low salinity water is particularly relevant for sea lice which can be a significant welfare and health issue for marine salmonid operations, both in terms of direct impact of the lice on the animals as well as lice infestation being associated with other diseases. Peer reviewed literature describes that sea lice, both *Lepeophtheirus* and *Caligus* species, are negatively impacted by low salinity water, particularly regarding fecundity, hatching success, and early life stages.
36. The salinity of the water at the Farm also imparts a lower osmotic differential between the blood of the fish and the surrounding environment relative to full salinity sites. Simply speaking, the fish have to use less energy to maintain the salt-water balance of their tissues. It is easier for them to maintain homeostasis. In aquaculture, use of reduced salinity water is a well-established tool for reducing stress in salmonid fish.
37. I am not aware of any pathogen-driven disease outbreaks at the Farm.
38. Historical mortality events at the Farm have been associated with localized, discrete events associated with transport stress, equipment malfunction, and low dissolved oxygen during periods of high temperature and high biofouling growth. Infrastructure upgrades, revised procedures, and enhanced monitoring have been implemented to mitigate recurrence.
39. The most common issues have stemmed from fish transport between the hatchery and the Farm. With approximately 30 truckloads per year, issues such as high temperature, low pH, low oxygen, or gas supersaturation in transport water have occasionally caused

mortality. WFN has updated its transport SOPs to mitigate water quality issues previously encountered and those that may occur.

40. Past mortality events have also occurred due to net cleaner malfunction or improper use, leading to physical trauma or reduced water flow and low oxygen in cages. Since then, guards have been installed on equipment, redundancy has been added through a second net washer, and annual training has been implemented.

March 2025 Mass Mortality Event

41. In March 2025, a rare and unprecedented anoxic water upwelling event caused localized fish mortality at the overwintering site 0814x.
42. WFN has since deployed real-time oxygen and temperature monitoring and is collaborating with an academic institution to better understand and predict similar events. Additional mitigation measures, including enhanced oxygenation technologies, are being investigated.
43. It has long been established (since the 70's) that Whycocomagh Bay features some basins with anoxic (low or no oxygen) water and sediment in deep water (Krauel 1975; Strain & Yeats 2002). These basins have stratified layers of water and very little mixing of deep layers occurs. This is demonstrated in water chemistry profiles relative to depth which show distinct thermoclines, oxyclines and haloclines. Although there is some movement of the clines and minor mixing of the top layers, as well as reports from past farming operations of upwelling of low oxygen "fingers" in the area, in my knowledge, the ascension of large quantities of the deep anoxic layers to near surface depth has never been recorded.
44. One of these basins that is anoxic at depth is adjacent to the area used to over-winter the fish at site 0814x.
45. In March 2025, this anoxic water ascended and expanded to the area where the fish were held, creating an oxycline measurable at only 2.5 m below the surface. Below this oxycline, the level of oxygen was so low, it resulted in high mortality.
46. A graph of recorded oxygen saturation levels at 2m, 4m and 6m depth outside of the fish cages, as collected at the Farm illustrates the significant decrease in oxygen:



47. Ecologists have been monitoring this area for decades and have never seen such an event before. There is no clear understanding of exactly what happened; however, it appears there was a water displacement event that moved the deep anoxic water up into shallower water, including where the cages and fish were housed. The reason for the water displacement has been suggested to be due to changes in water densities in the upper layers. These water density changes caused rapid adjustments in the stratified layers of water.
48. A possible explanation is that a sudden freeze increased salinity at the water surface, causing dense water to sink and displace the anoxic deep layer upward.
49. Sampling in May 2025 confirmed that the deep basin water was dramatically altered—it showed oxygen present to the seabed and no detectable H_2S or CH_4 . This contrasts the anoxic water with high levels of H_2S and CH_4 which previously existed there. This

indicates that bottom anoxic water was displaced with higher oxygen water from upper layers.

50. WFN has partnered with Cape Breton University and the Carnegie Institute of Science to model these dynamics and identify potential predictors. Sampling began in May 2025.
51. WFN has also installed its own real-time probes to enable real time monitoring of temperature and oxygen. The goal is to have a forewarning about low oxygen water moving in. Enhanced oxygen injection technology is also being investigated as a possible means to mitigate risks in case this event threatens to happen again.

February 2026 Super-chill Event

52. In February 2026, a super-chill event occurred at the overwintering site 0814 which led to mass mortality. The event was reported to DFA.
53. In late January 2026, water temperatures at the overwintering site dropped to as low as -1.1°C . The recorded temperature was low enough to cause a concern of super-chill in the fish. Lethal freezing temperature for rainbow trout is -0.75°C in the presence of ice (Fletcher et al., 1988). Temperatures recorded with the hand probe reached -1.1°C , and temperatures as low as -0.7°C were recorded with the real time probes. Oxygen levels remained high.
54. Because of the low temperatures, harvesting and all other activities on the Farm were stopped to reduce stress on the fish during this period and to prevent the fish from rising into the surface waters where there was an increased chance of ice crystals coming into contact with the fish.
55. By February 16, 2026, water temperature increased enough to begin site activities, including harvesting. While preparing for harvest, it was noted that a significant mortality was evident in the cages closest to shore.
56. This mortality has been attributed to super-chill, or mortality caused by low water temperature. As of swearing this affidavit, the extent of this mortality is still being assessed, although current estimates indicate that cages in shallower water have the greatest mortality numbers. In the future, cages will be held in deeper water as a

mitigation measure. This will give the fish more room to avoid the ice. There is no record of temperatures this low in this area since WFN took over the operation.

57. To the best of my knowledge, both the March 2025 event and the recent February 2026 event at the Farm are unprecedented for the history of WFN's trout farming activities, beginning in 2011. WFN is now taking steps to implement mitigation plans to address these contingencies.

Response to Public Written Comments

58. I have reviewed the written public comments submitted to the Board in this Application (NSARB-2025-001 Exhibit #007) and provide the following comments in response.
59. WFN has operated experimental sites 5010 and 5013 since 2019. Transitioning these to commercial status (1430 and 1431) will not increase stocking levels substantively.
60. Instead, if the Application is allowed by the Board, it will provide WFN more space and thereby enable longer fallow periods at 1430 and 1431 (15 months, instead of 3-4 months). This is designed to allow the seafloor to naturally assimilate any organic matter that may accumulate during the production period. It will also improve the cage orientation at 1430, so that it is parallel to shore and in deeper water, which together support better environmental performance.
61. Concerns were raised regarding the prior environmental performance of the sites.
62. The accumulation of organic matter and environmental impacts, if any, will continue to be monitored annually at minimum by independent third-party. The environmental monitoring will monitor the build up of biofouling, feces and feed beneath the fish cages and monitor impacts in benthic communities. Both provincial and federal regulations establish thresholds and response requirements.
63. WFN has already reduced the biomass at 0814x, as suggested by the Vandeplass, 2023 thesis referenced in the written comments, and proposed increased fallowing times that will be applied at 1430 and 1431 in response to previous environmental monitoring results, if the commercial licences and leases are issued.
64. I make this affidavit in support of WFN's Application and for no improper purpose.

VIRTUALLY AFFIRMED before me in Halifax, Nova Scotia, on MS Teams, with Ms. Rommens in Emyvale, Prince Edward Island on February 19, 2026.

[Redacted]

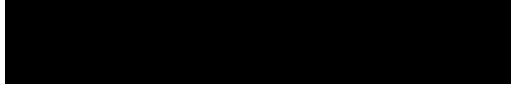
A Barrister of the Nova Scotia Supreme Court
Sara D. Nicholson

[Redacted]

Miss Rommens

**WFN Application re AQ#0814x, AQ#1430,
AQ#1431 in Whycocomagh Bay, Inverness
County**

This is Exhibit A referred to in the Affidavit
of Melissa Rommens, virtually affirmed before
me on February 19, 2026.



A Barrister of the Nova Scotia Supreme Court

Melissa Rommens

myvale, PE,
CANADA
M: [REDACTED]
[REDACTED]

Work Experience and Consulting Services Provided

Industry Production and Business Experience

- Wolffish and halibut broodstock management (2024-ongoing)
- Production and sustainability advice for cage culture of steelhead trout (2019-ongoing)
- Sustainability biologist for mussel aquaculture operation (2017-ongoing)
- Oyster hatchery feasibility assessment and business planning (2025)
- Recirculating aquaculture system optimization and risk mitigation for institutions and commercial operations (2019-2025)
- Conceptual design and financial modeling for chinook land-based operation (2021-2024)
- Feasibility assessments for land-based aquaculture operations (American eel, Atlantic salmon, Atlantic halibut, lumpfish, stock enhancement) (2015-2024)
- Suspended oyster culture feasibility modeling for Nova Scotia, relative to scale and start-up (2021)
- Business planning for medium-scale land-based salmon aquaculture in Atlantic Canada (2019-2021)
- Troubleshooting marine fish (halibut, sablefish) hatchery production (2017-2021)
- Biology advice for recirculating aquaculture system engineering design (2014-2019)
- Management of operations for land-based marine hatchery, nursery and grow out (2016-2017)
- Management of R&D and operations for land-based marine hatchery and nursery (1998-2016)

Research and Development

- Oyster aquaculture in a high energy environment (2024-ongoing)
- Striped bass pond culture productivity improvement (2013-2023)
- Development and management of land-based salmonid (Arctic char, Atlantic salmon) production efficiency improvement projects (2008-2016)
- Management of multi-year broodstock domestication program for Atlantic halibut, including the development of commercial all-female stocks and cryopreservation of milt (2004-2015)

Best Practices and Regulatory Programs

- Harmonization of finfish and shellfish health programs across regulatory districts (2024-ongoing)
- Land-based and marine finfish and shellfish aquaculture lease and licence applications for new sites, renewals, and amendments (NS) (2018-ongoing)
- Preparation of farms for certification: finfish and shellfish: Organic, BAP (2016-ongoing)
- Nova Scotia Aquaculture Management Regulation Farm Management Plan compliance: finfish and shellfish (2016-ongoing)
- Revision and development of Prince Edward Island Aquaculture Alliance's Aquaculture Environmental Code of Practice (2017, 2024)
- Development of industry facing documents and internal departmental documents and processes for adoption of Provincial Aquaculture Licence & Lease Regulations and Aquaculture Management Regulations (NS) (2016-2021)
- Facilitated outreach to industry regarding NS aquaculture regulation implementation (2016, 2019)
- Facilitation of government - industry - NGO discussions on a Pan-Atlantic Code of Containment for marine finfish (2018)
- Development of AANS Codes of Best Practice for shellfish and finfish farmers in Nova Scotia (2014-2016)

Aquaculture Training Delivery

- Instructor for Canadian Aquaculture Institute: Water quality assessment and troubleshooting; RAS systems; Live feed production; Salt water system maintenance (2014-ongoing)
- Curriculum development for 19-week Aquaculture Operations Course (NSCC) (2020-2021)
- Course development and instruction for Aquaculture segment of ORFA (NSCC) (2016-2021)

Education and Professional Development

Education

- Masters of Science in Biology, University of New Brunswick, Fredericton, NB (1997).
- Bachelor of Science, First Class Honors in Biology, University of New Brunswick, Fredericton, NB (1993).

Professional Training and Achievements

- TCPS 2: CORE-2022: Ethical Conduct for Research Involving Humans (2024)
- Aquaculturalist of the Year Award, presented by the Aquaculture Association of Nova Scotia (2023)
- m.S.O.A.R. Mindfulness Meditation for Professionals (2022)
- Seafood Safety Awareness & HACCP (2021)
- ISO 9001:2015 Foundation (2017)
- Principles and Applications of HACCP (2016)
- “The Next Phase” Workshop (business case preparation and pitching for private investment) (2015)
- Community Engagement Training for Aquaculture (2014)
- Life Cycle Analysis for Decision Makers (2013)

Additional Affiliations

- Adjunct Professor, University of Prince Edward Island (current)
- Board Member of Aquaculture Association of Nova Scotia (2016-ongoing) (Executive member 2018-2024)
- Member of PEI Aquaculture Alliance (2015-ongoing)
- Member of Aquaculture Association of Canada (2007-ongoing)

Publications in Refereed Journals

Overy, D.P., Groman, D., Giles, J.S., Duffy, S., Rommens, M., and G. Johnson. 2015. *Exophiala angulospora* causes systemic mycosis in Atlantic halibut: a case report. *Journal of Aquatic Animal Health* 27(1):12-19.

Ding, F., Milley, J.E., Rommens, M., Jun, Y., Lei, J. and S. Lall. 2012. Effect of hormone implantation on cryopreservation of Atlantic halibut (*Hippoglossus hippoglossus* L.) sperm. *Cryobiology* 65(1):51-55.

Ding, F., Milley, J.E., Rommens, M., Jun, Y., Lei, J. and S. Lall. 2011. Cryopreservation of sperm from Atlantic halibut (*Hippoglossus hippoglossus* L.) for commercial application. *Cryobiology* 63(1):56-60.

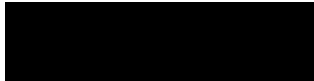
Reid, D., Smith, C.-A., Rommens, M., Blanchard, B., Martin-Robichaud, D., and M. Reith. 2007. A Genetic Linkage Map of Atlantic Halibut (*Hippoglossus hippoglossus* L.). *Genetics* 177:1193-1205.

Martin-Robichaud, D.J. and M. Rommens. 2001. Assessment of sex and evaluation of ovarian maturation of fish using ultrasonography. *Aquaculture Research* 32(2):113-120.

Morrison, C. Bird, C., O’Neil, D., Leggiadro, D., Martin-Robichaud, D., Rommens, M. and K. Waiwood. 1999. Structure of the egg envelope of the haddock, *Melanogrammus aeglefinus*, and effects of microbial colonization during incubation. *Canadian Journal of Zoology* 77(6):890-901.

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A Barrister of the Nova Scotia Supreme Court



**WFN Application re AQ#0814x, AQ#1430,
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19

WFN Processing Facility

AQ 1430

AQ 1431

AQ 0814x

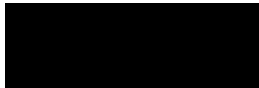
Image © 2026 Airbus
Image © 2026 CNES / Airbus

Google Earth

Imagery Date: 7/24/2023 45°57'40.31" N 61°04'17.37" W elev 0 m eye alt 12.13 km

**WFN Application re AQ#0814x, AQ#1430,
AQ#1431 in Whycocomagh Bay, Inverness
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