

**RECEIVED**

*By Nova Scotia Aquaculture Review Board at 1:38 pm, Jan 23, 2024*

2023

NSARB 2023-001

Nova Scotia Aquaculture Review Board

Between:

**KELLY COVE SALMON LTD.**

APPLICANT

- and -

**MINISTER OF NOVA SCOTIA DEPARTMENT OF FISHERIES AND  
AQUACULTURE**

PARTY

- and -

**KWILMU'KW MAW-KLUSUAQN NEGOTIATION OFFICE,  
QUEENS RECREATIONAL BOATING ASSOCIATION, 23  
FISHERMEN OF LIVERPOOL BAY, REGION OF QUEENS  
MUNICIPALITY, and PROTECT LIVERPOOL BAY  
ASSOCIATION.**

INTERVENORS

**Affidavit of Susan McGibbon  
Sworn on January 22, 2024**

I, Susan McGibbon, of Liverpool, in the Province of Nova Scotia affirm as follows:

1. I have personal knowledge of the evidence affirmed in this Affidavit except where otherwise stated to be based on information and belief.
2. 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.
3. I have been asked to review and provide expert opinion regarding the impacts of the proposed Kelly Cove Salmon Ltd. aquaculture boundary amendment and lease application for locations in Liverpool Bay, Queen's County enumerated as AQ#1205x, AQ#1432, AQ#1433 (the "Application"), on the Region of Queen's Municipality's ("RQM") branding strategy, branding investment and tourism strategy.

4. I have authored a report detailing my analysis and conclusions regarding the impacts of the proposal set out in the Application, on the RQM's brand ("the Report"), attached hereto as **Exhibit "A"**.
5. My qualifications as a subject matter expert on the impact of the Application on the RQM brand, are set out in my Curriculum Vitae at page 10 of my Report.
6. Based on my education and experience, my areas of expertise include marketing and creative industries as well as brand management and brand strategy.
7. The Report attached to this affidavit as Exhibit "A" represents my professional opinion with respect to the impacts of the proposed aquaculture operation as set out in the Application, on the RQM brand.

**AFFIRMED** before me at Halifax  
 Nova Scotia, this 22<sup>nd</sup> day of January 2024,  
 using real-time, audio-visual  
 technology:



\_\_\_\_\_  
 Barrister of the Province of Nova Scotia

)  
)  
)  
)  
)  
)  
)



\_\_\_\_\_  
**Susan McGibbon**

**NATASHA PUKA**  
 A Barrister of the Supreme  
 Court of Nova Scotia

2023

NSUARB 2023-001

This is Exhibit "A" referred to in the  
Affidavit of Susan McGibbon sworn to  
before me this 12 day of January 2024



---

Barrister of the Province of Nova Scotia

**NATASHA PUKA**  
A Barrister of the Supreme  
Court of Nova Scotia

**REPORT TO THE NOVA SCOTIA  
AQUACULTURE REVIEW BOARD**

**The Potential Effects for the Region of  
Queens Tourism Brand and Tourism  
Revenue from the proposed Kelly Cove  
Salmon Ltd. Marine Aquaculture Lease  
Locations in Liverpool Bay**

**Susan McGibbon  
January 21, 2024**



T H R E E  
S I X T Y

---

**collective**

## CONTENTS



1. Statement of Substance
2. Region of Queens Branding Process
3. Region of Queens Environmental Elements
4. Nova Scotia Tourism Brand
5. Nova Scotia Tourism Strategy
6. Summary & Conclusions
7. Appendix - CV



## 1. STATEMENT OF SUBSTANCE

The Tourism industry in the province of Nova Scotia has a value of \$3 billion dollars. The provincial Nova Scotia brand and the tourism brand is strategically rooted in “connecting people to the sea”.

Citizens of the province reinforce that daily with license plates that state we are “Canada’s Ocean Playground”. The Nova Scotia tourism brand strategy is based on reinforcing that by stating “we are a province that is shaped by the sea”. That strategy has then been translated into a brand promise for visitors that conveys that you will “find joy as pure as the sea”.

The Region of Queens determined in 2019 that it was time to develop a new brand strategy to support their economic development goals targeting the attraction of new residents, business investment and tourism.

The Region’s abundance of natural assets has played a big part in the growth of commercial and residential development throughout the area. Primarily located on lakeshores and the coastline, this form of development has accounted for much of the development that has occurred during the last few decades. The tourism industry has now grown from being seasonal to year-round for many operators including two the largest accommodation providers on the south shore.

The strategic foundation of the new brand was to be focused on the its diverse geography of superior natural landscapes including the ocean, beaches, lakes, rivers, and National and Provincial parks. A new brand was developed that celebrated this part of Nova Scotia’s “ocean playground”. An investment of over \$4M relaunched this nature focused brand, fully in line and supporting the governments Nova Scotia Tourism brand strategy.



## 2. REGION OF QUEENS BRANDING PROCESS

As part of the new brand development extensive research and consultations were undertaken. It became immediately clear the one thing the Region stood for should be drawn from the natural environment. Every part of the Region is blessed with natural beauty and unmatched outdoor experiences.

When the Region talked with residents about what they believe to be the area's icons, by far the most common response was beaches or a specific beach. Beyond that the responses referenced other aspects of nature. The amount of support for the beaches and ocean, coupled with the external assessment that the region's beaches are a truly differentiated asset (in a province filled with natural beauty, the region's beaches are truly remarkable) led to the recommendation to design the brand identity to evoke these strategic elements.

As such, the new brand speaks specifically to the natural environment. The new name became the "Queen's Coast" and the brand positioning invites everyone to "Seek Nature's Rewards"





### 3. REGION OF QUEENS ENVIRONMENTAL ELEMENTS

The Region is rich in its environmental elements, and they form a remarkable environmental basis for the Region's tourism sector. And brand. In November 2023, the Nova Scotia government announced that CARTERS BEACH (97 hectares) in Queens will be designated a new provincial beach. The area features some of the highest dunes in Nova Scotia, as well as salt marsh. It provides habitat for colonial nesting birds, the endangered piping plover and at-risk lichen, moss and orchids. It will be managed as a natural environment park so its unique environmental and cultural heritage can be protected and appreciated for generations to come.



Assembly of Nova Scotia  
Mi'kmaq Chiefs

ENVIRONMENT AREA / GROUP	FOCUS
UNESCO BIOSPHERE RESERVE	SouthWest Nova Biosphere Reserve One of only 18 ecosystems in Canada Internationally recognized
NOVA SCOTIA NATURE TRUST	Port Joli Conservation Lands Sand Beach Conservations Lands
NATURE CONSERVANCY OF CANADA	<b>COASTAL:</b> Port Joli Nature Reserve, Toby Island Nature Reserve, <b>INLAND:</b> Long Lake Bog Nature Reserve, Shingle Mill Bog Nature Reserve
NOVA SCOTIA PROVINCIAL PARKS	<b>COASTAL:</b> Thomas Raddall Provincial Park, Port L'Hebert Provincial Park, Summerville Beach Provincial Park, Carters Beach Provincial Park (pending) <b>INLAND:</b> Ten Mile Lake Provincial Park, Camerons Lake Provincial Park
PARKS CANADA	<b>COASTAL:</b> Kejimikujik Seaside Park, Port Joli Migratory Bird Sanctuary, Port Joli <b>INLAND:</b> Kejimikujik National Park
REGION OF QUEENS PARKS	<b>COASTAL:</b> Beach Meadows Municipal Park, Fort Point Park, Port Medway Lighthouse Park <b>WATERWAYS:</b> Pine Grove Park, Cub Scout Park, Tupper Park
ASSEMBLY OF NOVA SCOTIA MI'KMAW CHIEFS	National Marine Protected Park and terrestrial conservation area - an early stage project





## 4. NOVA SCOTIA TOURISM BRAND

Nova Scotia's destination brand is the promise that is made to potential travellers. It was crafted to capture the feeling of authentic experiences and serendipitous moments that make lasting memories and great stories and provides a strong emotional appeal. And it is intended to demonstrate "ownership" of the sea.

### → Brand Positioning

---

#### New Discoveries Born of the Sea

---

For explorers who seek out an immersive travel experience, Nova Scotia is the Canadian destination where the history, culture, people and landscape are distinctly shaped by the sea. In **Nova Scotia**, you will never be far from the sea and its influence.

### → Brand Promise

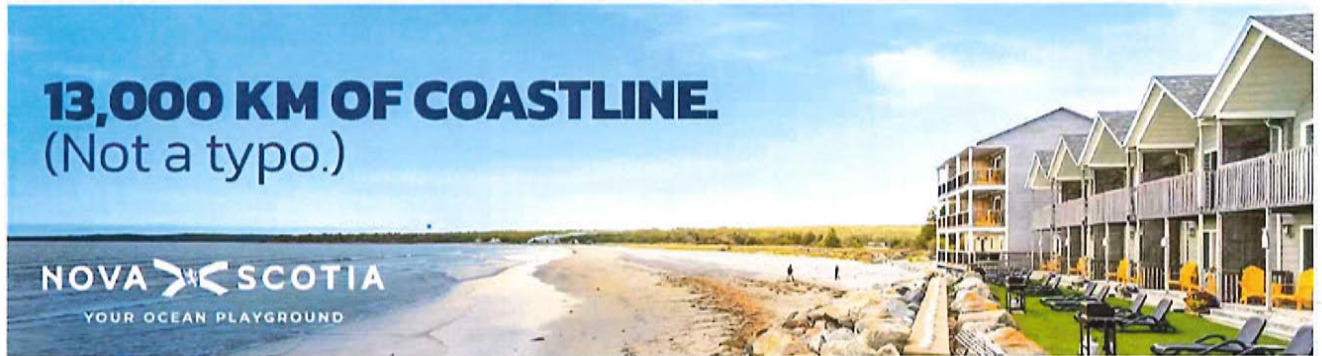
---

Find joy as pure  
as **the sea.**



## 5. NOVA SCOTIA TOURISM

Post covid Tourism Nova Scotia shifted it's strategy to a total focus on "Your Ocean Playground". This new marketing campaign focuses on seacoast adventures by exploring 13,000 kilometres of the Nova Scotia coastline. And importantly, it is a 4 season tourism strategy indicating the strength of Tourism as on of the largest revenue generators in the province and it's continued growth.



Summerville Beach, Region of Queens.

### OUTDOOR WINTER ACTIVITIES IN NOVA SCOTIA



NOVA SCOTIA  
YOUR OCEAN PLAYGROUND





## 5. NOVA SCOTIA TOURISM

Based on the most recent Atlantic Canada Travel Study, the most common reasons for choosing to visit Nova Scotia include “wanting a seaside/coastal/beach vacation” or wanting an outdoor vacation to get back to nature”. 46% of visitors have that intent. And 83% of visitors come because the province offers “great outdoor adventures”.

Atlantic Canada Travel Study | Spring 2022

### REASONS FOR CHOOSING NOVA SCOTIA

#### Main Reasons for Choosing Nova Scotia

Among Those Planning Overnight Pleasure Trips To NS The Next 12 Months

Visiting family/friends there	27%
I want a seaside/coastal/beach vacation	26%
I want an outdoor vacation/to get back to nature	20%
Has attractions/activities that interest me	19%
Close to home/not far to travel	19%
Generally, has lots of activities/there's a lot to keep me and my family busy there	17%
Is less expensive/better fits my budget than other destinations	16%
Never made a pleasure trip there/would be a new and different trip for me	15%
It's safer to travel there right now due to COVID	15%
Fewer tourists than in some other destinations	10%
Is easy to find information about travelling there	9%
I want to experience a different culture	9%
Is my usual travel destination	7%
I want a vacation in the mountains	5%

- From a provided list of reasons, the most common reasons for choosing to visit Nova Scotia include visiting family/friends or wanting a seaside vacation.
- Notably, 15% of those planning a trip to/within Nova Scotia in the next 12 months indicate they have never made a pleasure trip to Nova Scotia before, suggesting there is strong potential for first-time visitation in 2022.

- Which of the following reasons best describe why you are planning or thinking of taking this trip within [Nova Scotia], instead of somewhere else?



Atlantic Canada Travel Study | Spring 2022

### PERCEPTIONS OF NOVA SCOTIA

#### Completely/Somewhat Agree About Nova Scotia

*Offers everything I want to experience, close to home (ATL residents only)	87%
Offers great outdoor adventures	83%
Has charming towns/communities	83%
Provides a more relaxing, leisurely trip than other destinations	78%
Delivers the main things I need from a travel destination	77%
Has unique and different features that other destinations don't	77%
Has lots of activities to fill a vacation with	77%
Is a safer place to travel than other destinations right now	77%
Has lots of interesting "out-of-the-way" places	76%
Has lots of family friendly experiences	75%
Has a surprising number of destinations and attractions	72%
Is good value for the money	72%
Offers consistently high-quality travel experiences	70%
Is great for fun and being constantly entertained	68%
Offers exciting urban/city experiences	64%
Is a trendy destination	62%
*I'd prefer to vacation in another area that is less familiar/more out-of-the ordinary to me (ATL residents only)	62%

- Overall perceptions of Nova Scotia among Canadian travellers are very positive, with a majority of respondents endorsing all statements.
- Those attributes most ascribed to Nova Scotia by Canadian respondents include that it has great outdoor adventures (83%) and charming small towns and communities (83%).
- Additionally, close to nine in 10 Atlantic Canadian travellers agree Nova Scotia offers everything they want to experience, close to home.



- Based on your impressions of it, how much would you agree or disagree that [Nova Scotia]...?
- These items were asked of Atlantic Canada residents only



## 6. SUMMARY AND CONCLUSIONS

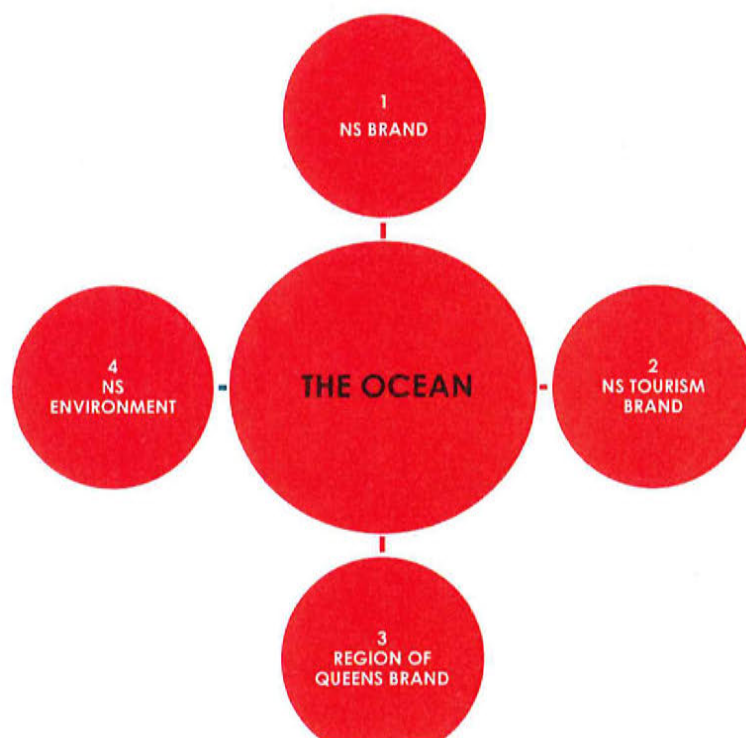
There is a direct link in our opinion between the environmental elements of the province (which fully exist in the Region) and the economic benefits that result by the promotion of those elements.

Tourism Nova Scotia is also razor focused on "sustainable tourism". Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities.

Additionally, the Province is committed to protecting 20 per cent of Nova Scotia's land and water mass by 2030. It is 2024.

Introducing a new aquaculture facility in Liverpool Bay would be both a challenging and opposing strategy to both the Nova Scotia government's brand strategies and tourism strategies.

The introduction of the new fish farm within the Region would be strategically opposite philosophically and economically based on the current environmental areas and elements that exist and tourism strategies that are in place. The role of the environment, and specifically the ocean is critical to the tourism sector within Queens.



## 6. APPENDIX - CV



SUSAN MCGIBBON

email: [REDACTED]

phone: [REDACTED]

---

### PROFESSIONAL PROFILE

Senior creative and strategic brand leader, strategist and innovator with 35+ years of experience in the Marketing, Research and Creative industries. Successful in combining business acumen, strategy and marketing knowledge with a high level of creativity and superior team-building skills to generate significant business, brand and market share results. Recognized for setting and achieving high standards. Industry leader in Canada. Known for my high energy and entrepreneurial leadership style that fosters a culture of creativity and innovation. Recognized for uncovering robust insights, developing insightful ideas and formulating powerful strategies.

---

### PROFESSIONAL EXPERIENCE

2016 – PRESENT

THREE SIXTY COLLECTIVE

#### Chief Experience Officer

*Managed business development, client service, with a focus on branding, marketing, research and strategy.*

- Independently owned firm of strategists, urban planners, researchers and marketers
- Offering exceptional knowledge and depth of expertise with regards to developing and retail strategy in the world of development based on a sound strategic rationale
- Our robust expertise includes traditional and non-traditional retail sectors, communities, development and real estate
- We create impact through brands, experience and places
- We are forward thinking and specialize in creating vibrant and viable brands, communities and remarkable experiences
- Key Achievements
  - Strategic counsel and positioning leadership (*real estate & development*): Bentall Kennedy, Brookfield, Cadillac Fairview, Choice REIT, First Capital, Ivanhoe Cambridge, Liberty, McCor, Kingsett Capital, Oxford, Riocan
  - Strategic counsel and planning (*retail & retail services*): Malls, Mixed use, Office Towers, Outlet Malls, Power Centres, Public Markets, Shopping Centres
  - Strategic counsel and planning (*other*): Business Improvement Areas & Districts (BIAS), Municipal Cities & Towns across Canada

2005 – 2015

CHEMISTRY & THE RETAIL LAB

#### President & Partner

*Managed business development, client service, financial P & L, strategic planning.*

- Independently owned firms specializing in brand management and strategy
- Offering included positioning, employee engagement, customer experience, branding, naming, identity, marketing communication planning
- Key Achievements
  - Strategic counsel and positioning leadership (*retail*): Addition Elle, Bombay Company, Boston Pizza, Cadillac Fairview, CMT Canada, Mango, Gap, Neatfreak, Penningtons, RAM Golf, Reitmans, Royal Canin, Smart Set, Thyme Maternity, Tommy Armour, Umbra, Wine Online.
  - Strategic counsel and positioning leadership (*other*): Canadian Film Centre, Monogram Appliances, Ontario Tourism, Peterborough & The Kawarthas, President's Choice Financial, SaskTel, Telus, Town of Wolfville.

## 6. APPENDIX



2002 – 2004

### TAXI ADVERTISING & DESIGN

#### Director Strategy & Brand Planning

*Reported to the President as a member of management group.*

- Responsible for strategic and brand planning.
- This included brand management, positioning & strategy, integrated marketing communication planning, competitive assessment & analysis, experience strategy, name generation, organizational integration, portfolio architecture.
- **Key Achievements:**
  - Re-branded and re-positioned key brands: Addition Elle, Reitmans, The Shoe Company, Town Shoes, WestJet
  - Developed groundbreaking launch programs: MINI Cooper Canada (Canadian launch, Customer Loyalty program), Telus (Fresh – youth brand)
  - Developed groundbreaking marketing communication plans and campaigns: Addition Elle, Corel, Desjardins Financial, MINI Canada, Molson (Bavaria, Pilsner, Rickards), NIKE, Penningtons, Pottery Barn, Telus, The Movie Network, The Shoe Company, Williams Sonoma.

1998 – 2001

### COSSETTE COMMUNICATION MARKETING

#### Vice President, Group Client Service Director

*Reported to the President as a Senior Director of the Canadian management group. Managed financial P & L of \$50M, 10 direct reports and a convergent team of 25 in offices in Toronto, Montreal and Halifax.*

- Responsible for convergent marketing communications planning, creative and media for: Bell Mobility, Petro-Canada, Bank of Bermuda, MTT, Aliant, Delano Technology, Irving Tissue, The Canadian Olympic Association, edeal and The Learning Partnership. This included strategic planning, advertising, branding, media, promotion, direct marketing, research, sponsorship, interactive and design.
- Key Achievements:**
- Re-branded and re-positioned key brands: Bank of Bermuda (You can get there from here), Bell Mobility (Boldly Go), MTT/Aliant (From here to everywhere), Petro-Canada (Canada's Gas Station).
  - Developed and executed groundbreaking retail brand promotion strategies: Bank of Bermuda (EasyLink), Petro-Canada (ROOTS, Petro-Points 'Pump 'n Win GM Cars for life', Olympic Torch Scholarship Fund).
  - Planned and executed new product launches through multi-media channels: Bank of Bermuda (EasyLink ATM, EasyLink Debit, EasyLink Online), Bell Mobility (PCS Real Time, SOLO pre-paid), Petro-Canada (SuperClean WinterGas). This resulted in winning a CASSIE for Petro-Canada.
  - Co-managed the acquisition and integration of Cossette Atlantic (formerly Pulse Marketing) into the Cossette Group upon winning the Aliant Telecom pitch.



## 6. APPENDIX

1990 – 1997

IKEA NORTH AMERICA

### **Director of Marketing**

*Responsible for leading the strategic development, management and execution of all external and internal marketing including advertising, direct marketing, POP, PR, merchandising. Managed a \$30+M budget and four advertising agencies.*

- Developed and implemented 5 years brand re-positioning strategy which resulted in a 25% sales increase and a 2% market share gain, outpacing the market.
- Key Achievements:
  - Pioneered, launched, and managed the first IKEA North American loyalty and credit programs “IKEA Family”, successfully growing the database to 250,000 active members.
  - Initiated and developed the strategy and plan for the first “Home Shopping Division”, resulting in a launch that exceeded its goals by +25%.
  - Developed and launched a first ever business furnishings division “IKEA Business”.
  - Development and management of new concept, format and distribution of annual catalogues (4 million) and mini catalogues (4 million x 6 yearly).

1988 – 1990

VISTA Magazine, a division of Magna International

Director of Marketing

1987 – 1988

MCCLELLAND & STEWART

Director of Consumer Marketing

1982 – 1987

SATURDAY NIGHT MAGAZINE

Director of Consumer Marketing

1981 – 1982

LAURA ASHLEY INC.

Design Director

---

### EDUCATION

Bachelor of Arts, Business Communications & Fine Arts

McGill University – 1981

---

### VOLUNTEER

Federation of Ontario Public Libraries

Board of Director, Rural Trustee – Current, 1st Term

Township of Georgian Bay Public Library

Board Chair – Current, 2<sup>nd</sup> Term

---