

**From:** [Bear Cove Resources Storm-cast](#)  
**To:** [Aquaculture Review Board](#)  
**Subject:** RE: Upcoming hearing on Kelly Cove Salmon Ltd. in Liverpool Bay, Request to make an oral statement  
**Date:** February 8, 2024 11:23:02 AM  
**Attachments:** [REDACTED]

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

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Bear Cove Resources

Robert Luliucci with Elizabeth Hartt

[REDACTED], Brooklyn, N.S. [REDACTED]  
[REDACTED]; [REDACTED]

RE: Applications have been made by **KELLY COVE SALMON LTD.** for a **BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES and LEASES** for the cultivation of **ATLANTIC SALMON (*Salmo salar*) - AQ#1205x, AQ#1432, AQ#1433** in **LIVERPOOL BAY, QUEENS COUNTY.**

Good morning,

We would like to make an oral statement before the Board to express our concerns about the possible approval of the Kelly Cove Expansion plans for Liverpool Bay. When the Intervenor Application made by South Queens Chamber of Commerce was denied status Bear Cove Resources was named as one of the members who may wish to make a written or oral statement.

Bear Cove Resources is a small family business located in East Berlin Queens County owned by Robert Luliucci and operated with his wife Elizabeth Hartt. This is our 31<sup>st</sup> year of collecting wrack under license from NS Department of Natural Resources and Renewables; we have 50 years of watching storm events in Liverpool Bay. Our business model is changing as demand for seaweed increases and we have been exploring seaweed farming possibilities in Liverpool Bay and how it may fit with the many other activities in the bay.

We feel that we have input of value in this discussion of expansion of the lease to Kelly Cove Salmon Ltd. particularly on **Factor 1** the optimum use of Liverpool Bay and on **Factor 4** the oceanographic and biophysical characteristic of the site environment, especially sites AQ#1432 and AQ#1433.

Please accept our request to make an oral statement at the hearing.

If accepted, do we send a written version ahead or simply provide copies at the hearing?

Respectfully submitted,

Robert Iulucci & Elizabeth Hartt



***Bear Cove Resources, Storm-cast***

[Redacted] East Berlin Brooklyn, Nova Scotia [Redacted]

[Redacted] [Redacted]

Phone [Redacted] Mobile: [Redacted]

**From:** [Kate Collins](#)  
**To:** [Aquaculture Review Board](#)  
**Cc:** [REDACTED]  
**Subject:** Request for oral submission at KCS ARB  
**Date:** February 12, 2024 10:21:52 AM

**RECEIVED**

By Nova Scotia Aquaculture Review Board at 11:03 am, Feb 12, 2024

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February 12, 2024

RE: KELLY COVE SALMON LTD. application for a BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES and LEASES for the cultivation of ATLANTIC SALMON (*Salmo salar*) - AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEFENS COUNTY

On behalf of the Aquaculture Association of Nova Scotia (AANS), I am requesting permission to make a sworn oral statement at the ARB hearing for the application by Kelly Cove Salmon for a boundary amendment and two new marine lease/licenses in Liverpool Bay.

The oral statement will be made by the Executive Director of the AANS, who will be hired this month and settled in time to provide the oral statement in March or April. If the ARB requires a name and civic address now in order to approve our request for an oral statement, please use Michelle Samson:

- Michelle Samson is the President of the Board of Directors of the AANS and the Director of Aquaculture at Premium Seafoods Limited located in Arichat, Richmond County, Cape Breton.
- Civic address: [REDACTED] ARICHAT NOVA SCOTIA [REDACTED]  
CANADA

The oral statement made by the AANS will address factors a, b, f and h set out in section 3 of the Aquaculture Licence and Lease Regulations. Can you please reply with an email confirming my request?

Thank you,  
Kate Collins



Kate Collins, MSc.  
Director of Projects

[REDACTED]  
[SEA FARMERS.CA](http://SEA FARMERS.CA)



**RECEIVED**

By Nova Scotia Aquaculture Review Board at 5:18 pm, Feb 12, 2024

**From:** [Andrew Tyler](#)  
**To:** [Aquaculture Review Board](#)  
**Subject:** Request to make an oral statement  
**Date:** February 12, 2024 12:49:48 PM

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Hello,

I would like to make a sworn oral statement at an upcoming Aquaculture Review Board meeting in Liverpool, on either March 4th or April 2nd, 2024, regarding Kelly Cove Salmon applications AQ#1205x, AQ#1432, and AQ#1433.

My full name: Andrew Tyler

Civic address: [REDACTED] Liverpool NS [REDACTED]

I would like to speak to Aquaculture Licence and Lease Regulations Section 3, specifically:

- B) the contribution to the local community and economic development; and
- E) other users of public waters.

Thank you in advance for your consideration.

Sincerely,  
Andrew Tyler

February 10, 2024

**RECEIVED**

By Nova Scotia Aquaculture Review Board at 8:58 am, Feb 13, 2024

Leslie Clarke

Sender [REDACTED]

Brooklyn, NS [REDACTED]

E-mail: [REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board  
60 Research Drive  
Bible Hill, NS B6L 2R2  
E-mail: [Aquaculture.Board@novascotia.ca](mailto:Aquaculture.Board@novascotia.ca)

Attention: Nova Scotia Aquaculture Review Board,

**Re: The application by Kelly Cove Salmon Ltd. for a BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES AND LEASES for the cultivation of Atlantic Salmon (*Salmo salar*) – AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.**

I am writing to the Aquaculture Review Board to request for a Oral Presentation, maximum of 6 minutes to be presented on the following in Section 3.

My family and I have been residents of Queens County by the coast for 48 years and counting. It is important that I receive the opportunity to present to the board what is important to me as a long time citizen with ties to the following.

Legislation: Fisheries and Coastal Resource Act, and the Aquaculture License and Lease Regulations Section 3

### **Section 3**

In making decisions related to marine aquaculture sites, the Review Board or Administrator must take all of the following factors into consideration:

**a) the optimum use of marine resources;**

I will speak to what I have experienced first hand of the marine resources in Liverpool Bay and how they provide the wealth of local food and the contribution these resources have brought.

**d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;**

With 48 years of living by the coastal waters, I have witnessed many characteristics that have changed these public waters. This is with the existing site in place, having my voice in front of the board is important for citizens here in Queens County to be heard.

**f) the other users of the public waters surrounding the proposed aquaculture operation;**

With my grandchildren, children and previous generations, we have swam, dug clams, picnics on the beaches, climbed the coastal rocks and have first hand reports on what has happened with just the existing site, the thought of this increasing by 370%. I need the opportunity to share what the public waters mean to residents in Beach Meadows and nearby.

I want to thank the Aquaculture Board to let me take the opportunity to share what it is like living by the coastal waters and to hear what the effects are when an existing site is here and to imagine the enormity of the expansion and the effects it will have with me and my community.

Regards,  
Leslie Clark

February 12, 2024

**RECEIVED**

By Nova Scotia Aquaculture Review Board at 9:42 am, Feb 13, 2024

Scott Christian

Liverpool, NS

E-mail:

Clerk of the Board: Nova Scotia Aquaculture Review Board  
60 Research Drive  
Bible Hill, NS B6L 2R2  
E-mail: [Aquaculture.Board@novascotia.ca](mailto:Aquaculture.Board@novascotia.ca)

Attention: Nova Scotia Aquaculture Review Board,

**Re: The application by Kelly Cove Salmon Ltd. for a BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES AND LEASES for the cultivation of Atlantic Salmon (*Salmo salar*) – AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.**

Dear members of the Nova Scotia Aquaculture Review Board,

My name is Scott Christian, at this point the only person to announce their candidacy to run for Mayor of the Region of Queens Municipality in the upcoming election to be held on October 19, 2024. I am writing to request the opportunity to make an oral presentation at the upcoming hearing to argue against the boundary amendment and granting of new licenses/leases for cultivation of Atlantic Salmon in Liverpool Bay.

It is my understanding that one element your board must consider in this process is 3(b) *the contribution of the proposed operation to community and Provincial economic development*. I would like to focus on the foreseeable negative economic impacts the proposed operation could lead to in our local community. Specifically, I would like to speak to how much our community relies on tourism, boating and coastal leisure activities as an economic driver, and the extent to which our region has positioned the economic future of our community as a pristine costal landscape to be discovered and enjoyed. Open-pen feedlots at the entrance point to our community when arriving via boat or observing from the Brooklyn/Western Head shore roads, is a terrible first impression. Businesses in our community cannot afford to have future visitors choose an alternative location because our bay is filled with salmon farms. This operation would also diminish property values for developable residential lands, substantially so along the harbor entrance. Inversely, our community does not benefit economically from these operations either directly via tax/lease revenue or indirectly via job creation.

Part of my platform in running for Mayor is to work to attract right-fit investments in our community, it is clear to me that open-pen fish farms are not the solution. I would appreciate the opportunity to present this oral argument at the hearing.

Regards  
Scott Christian



**RECEIVED**

By Nova Scotia Aquaculture Review Board at 3:22 pm, Feb 14, 2024

*Premium Lobster From The North Atlantic*Monday, February 12<sup>th</sup>, 2024

**Attention:** Clerk of the Board. Nova Scotia Aquaculture Review Board.  
60 Research Drive, Bible Hill, Nova Scotia. B6L 2R2.  
Email – [Aquaculture.Board@novascotia.ca](mailto:Aquaculture.Board@novascotia.ca)

Re: Applications made by Kelly Cove Salmon Ltd., for a Boundary Amendment and Two New Marine Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon (*salmo salar*) – AQ # 1205x, AQ1432, AQ1433 in Liverpool Bay, Queens County, Nova Scotia.

Good Day:

I request permission to make a 6 minute oral statement before the Board to express my concern on behalf of **Tangier Lobster Company** with respect to potential expansion approval re. the above Applications for **Liverpool Bay**.

As Managing Director of Tangier Lobster I have 43 years consecutive experience in the lobster sector. I have exported during that time in excess of 150 million pounds of live lobster to clients in 21 countries around the world.

By way of background reference only, I was a founding member and Director of the Lobster Council of Canada and I am a current Board Member and Secretary of the Nova Scotia Seafood Alliance. I am also a Member of the Minister's Aquaculture Advisory Committee.

I would propose to appear before the Board's upcoming hearing only in my capacity as Managing Director of Tangier Lobster Company.

████████████████████  
██████████ Tangier Nova Scotia Canada ██████████  
Tel: ██████████ Fax: ██████████

In the time allotted, I would propose to briefly speak to the following factors listed as among those which the Aquaculture Review Board must consider:

- a) The optimum use of marine resources
- b) The contribution of the proposed operation to community and Provincial economic development
- c) Fishery activities in the public waters surrounding the proposed aquaculture operation

Thank you in advance for your consideration of this request.

Sincerely,

Stewart Lamont  
Managing Director  
Tangier Lobster Company Limited  
Tel [REDACTED]



**RECEIVED**

By Nova Scotia Aquaculture Review Board at 8:36 am, Feb 13, 2024



Clerk of the Nova Scotia Aquaculture Review Board  
60 Research Drive, Bible Hill, NS B6L 2R2

February 12, 2024

**Re: Ecology Action Centre request to present a sworn oral statement at the KCS Liverpool Bay NSARB hearing | AQ#1205x, AQ#1432, AQ#1433**

Dear Clerk of the Nova Scotia Aquaculture Review Board,

Please accept this request by the Ecology Action Centre (EAC) for a sworn oral statement at the Nova Scotia Aquaculture Review Board (NSARB) hearing for the Kelly Cove Salmon (KCS) Liverpool Bay application, commencing March 4, 2024.

Our statement will address four of the “factors for consideration” outlined in the Nova Scotia Aquaculture Lease and License Regulations as follows:

**(a) the optimum use of marine resources:**

In our view, the “optimum use” of any marine resource should be defined by those who use, steward, benefit from or have a stake therein; we argue that the KCS proposal cannot thereby be defined as the optimum use of the marine resources in question.

**(b) the contribution of the proposed operation to community and Provincial economic development:**

The economic contribution of the proposal to the community and the Province is not sufficient to warrant an approval of the project relative to other concerns. An approval of the application on these grounds would necessitate an overwhelming economic contribution when considering: (1) the potential risk to other, existing economic interests; and (2) the community’s clearly demonstrated opposition to the project.

**(d) the oceanographic and biophysical conditions at the site:**

The proponent is not offering industry best practices of sustainability at its existing or proposed Liverpool Bay sites. This application risks avoidable harm to the local marine ecosystem and to the fish stock raised in public waters.

**(g) the sustainability of wild salmon:**

Sea lice outbreaks and escapes are more likely to proliferate in the Liverpool Bay area through the approval of the KCS proposal. These incidents can cause significant harm to wild Atlantic salmon nearby. We assert that this increased risk is unacceptable for vastly depleted wild Atlantic salmon populations on Nova Scotia's South Shore, and for the many people who care greatly about these fish throughout the region.

We thank you for the opportunity to share our views before the Board. Please don't hesitate to reach out with any questions or concerns.

Sincerely,



Simon Ryder-Burbidge  
Senior Marine Coordinator  
Ecology Action Centre  
Kjipuktuk, Mi'kmaw Territory  
2705 Fern Ln., Halifax, NS B3K 4L3