

From: [REDACTED]
 To: [Aquaculture Review Board](#)
 Subject: AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY
 Date: January 8, 2024 8:33:56 AM

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Krista and Dan Doody

[REDACTED]
 Mersey Point, N S
 [REDACTED]

January 8, 2024

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

Via e-mail: Aquaculture Board@novascotia.ca

We are writing in opposition to the proposed Kelly's Cove fish farm expansion in Queens County. There is absolutely no reason this application should move forward, and it must be denied. We are not "busybodies" – the term used by ARB in discussing applications. We are homeowners who have a direct economic, legal and personal interest in the application and its denial. We would be affected by the noise, the lights and a view not equivalent to Queens County motto of "Seek nature's rewards", as well as the drop in property value associated with living within spitting distance of a fish farm.

Section 3.2

Our research shows that the ocean will be polluted, our wildlife will suffer and the economy will shrink. The map clearly shows that the proposed expansion is much too close to the shore and is much too close to people's homes. Currently properties along the shore are selling at a premium and we pay atrociously high taxes for this "luxury". Property values will decrease which will put fewer tax dollars into the Municipality.

The promise of jobs is a moot point. Every industry in the region is desperate for workers.

Section 3 - 4

At a depth of only 30m, the water is too shallow. Fish farms in Norway require a depth of 700 m. This area is susceptible to damage from storms, and I have copied and pasted the alert for Hurricane Lee of September 16, 2023. "Impacts from storm surge are expected, including coastal flooding, beach erosion, infrastructure damage, spread of coastal debris, and localized coastal road washouts". The proposed cages would be sitting directly in the path of destruction, the damages will land on our shores and the contaminated fish will once more escape.

This area sees many harbour seals which are known to be attracted to the salmon and get themselves caught in the pens unable to escape. They will suffer.

Section 3 - 5.6

Nova Scotia prides itself on its pristine waters and beaches and fish farms are the exact opposite of that. This year we noticed an increase in boating traffic from the Liverpool and Brooklyn Marinas. Despite the poor weather there were ships and boats of every size constantly visible. There were motorboats, fishing vessels and sail boats of all shapes and sizes. It was quite exciting to witness. An increase in boating traffic is good for the economy. These boats will not want to pass by the ugly, contaminated fish farms and will look elsewhere for their boating pleasures.

Two years ago we witnessed the iconic Bluenose II sail into Liverpool harbour. If those fish pens are allowed to occupy that piece of our ocean, the Bluenose II will not have room to sail by and the residents of Queens County will be forever denied the enjoyment of this piece of history.

We cannot say that we are proud of our oceans and then allow large corporations to bully us into polluting them. Tourists will not be interested in visiting beaches with fish farms in sight. They will go elsewhere.

Section 3 - 5

Environment Canada has previously mapped 4 square kilometers of Beach Meadows as a critical habitat for Piping Plovers. The existing fish farm at Coffin Island falls within that zone as does any potential discharge, debris or waste that flows from it. With this area being a known critical habitat zone, we call on all levels of government, from local municipal, to provincial, to federal to uphold their responsibilities in protecting the habitat of the Piping Plover in consideration of permitting or accepting not only the current industrial fish farm at Coffin Island, but the proposed expansion of it.

It is known that Cooke is currently operating outside their lease boundary with no repercussions. They have hence set a precedent that they care not for rules and regulations and must not be allowed to continue to operate in Nova Scotia. Nova Scotia must move forward and be progressive by moving towards land-based fish farms.

I invite you to personally view the proposed site. Once you do, you will see immediately that this is not suitable. Come again during a hurricane and

you will see that the pens would be destroyed, smashed to bits. Put yourself in our shoes. Would you want to live across from a fish farm. The answer is no, why should we?

Nova Scotia must show that it is a progressive province. Fish pens are being removed from the west coast of Canada, therefore the east coast must show consistent values and make the same decision to not allow them in our ocean. The research is clear that fish pens have no future, they are a thing of the past.

We trust you to make the correct decision to not only protect our oceans but also to follow the science as well as listen to the wishes of the residents of Nova Scotia.

Regards,

Dan and Krista Doody

[REDACTED]

[REDACTED]

[REDACTED]

January 10, 2024

The primary mandate of the Queens General Hospital Foundation is the recruitment and retention of Health Care Professionals for Liverpool and Queens County.

Our website and branding emphasize the pristine environment we enjoy here and this is the draw for 100% of the Professionals we are trying to recruit. Liverpool Bay is a beautiful venue for sailing vessels and the volunteer driven Brooklyn Marina hosts travelling sail boats and runs regattas and sailing lessons for beginners . Dr. [REDACTED] one of our physicians developed into a world class competitive sailor because of his ability to train in Liverpool Bay. Having this ability to sail for recreation and competition in Liverpool Bay determined his decision to stay and work in Liverpool. Fish farms in Liverpool Bay impact in a negative way all vessels under sail using Liverpool Bay for recreational / competitive purposes.

The expansion of fish farms in Liverpool Bay threatens what we have been working to achieve and flies in the face of our branding, and the draw of a “pristine environment” . This is what we are selling to attract these valuable professionals who are in such short supply. We cannot afford to loose something that makes us unique !

QGHFoundation wants to go on record as opposing the expansion of further fish farms in Liverpool Bay for these reasons.

[REDACTED]

Dr. Al Doucet,
Chair, QGH Foundation

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:43 am, Jan 22, 2024

From: [Meghan Foran](#)
To: [Aquaculture Review Board](#)
Subject: Section C - Fisheries and Activities.
Date: January 21, 2024 9:14:59 AM

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To: ARB

RE: Site / Lease # 1205X, 1432, 1433

From:
 Meghan Foran

[REDACTED]
 [REDACTED] QC

Dear Chair Person & Board,

I being a visitor the area, was not just overwhelmed by the beauty of the coastline, we were mesmerized by the massive natural beauty of Beach Meadows Beach.

During our visit, we were able to go out on these amazing local lobster fishing boats. This was a once in a lifetime experience.

Sad to hear them explain to us as visitors and tourists to the area, that they were faced with the possibility of this expansion of these salmon farm cages. They explained to us that there would be fish farms put right on top of where they lay their lobster traps in the spring time. Of course being from away and seeing this frustration in their faces, I was terribly upset.

I then looked into what was going on and want our word to be put in print, to support the locals.

The acceptance of this application would negatively impact the use of the public waters by others' surrounding the proposed aquaculture site, not only to it being an eye sore but impacting ability to use the waters in that area. Furthermore, it is clear that this expansion would impact the number and productivity of other aquaculture sites - particularly lobster fishing - in the public waters surrounding the proposed aquaculture site.

Please don't accept this application for expansion, based on what the local lobster fishers have to be faced with.

To further this, we want to visit Nova Scotia again, that area is a treasured gem on this earth, why tarnish it. We understand it to be a huge 60 pen site with farmed salmon. This does not make any sense. Follow the local voice and decide against this.

Your Truly,
 Meghan Foran

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:12 pm, Jan 22, 2024

From: [Dianne Muldoon](#)
To: [Aquaculture Review Board](#)
Subject: RE: Section C - Fisheries and Activities - Site / Lease # 1205X, 1432, 1433
Date: January 22, 2024 2:02:08 PM

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Dianne Muldoon

[REDACTED]
[REDACTED] ON [REDACTED]

RE: Section C - Fisheries and Activities - Site / Lease # 1205X, 1432, 1433

Dear Chairperson(s), Board members:

I have visited and stayed in **Beach Meadows, Nova Scotia** several times over the years and have walked the beach as well as swam and played in the ocean. Beach Meadows is one of the most beautiful, tranquil, clean and safe beaches I have ever experienced in Canada. In addition, during our visit, we were taken on a tour on their local "lobster fishing boats", what a fantastic experience, something I will never forget !! I have had the experience of eating fresh lobster there as well, I absolutely love it and will only eat their fresh lobster.

With this being said; as a tourist and visitor, it is truly upsetting to hear that they are faced with the possibility of an expansion to the salmon fish farm cages. It was explained to us, as we were not even aware, that they would put the fish farms right on top of where they lay their traps in the springtime. To hear of this possible project, would definitely bring frustration to those who live at and are close to Beach Meadows. I want to be supportive and ensure that the lobster industry continues to thrive and the fish farm expansion application will not be considered.

I am writing this letter to support the locals of **Beach Meadows**; based on what the local lobster fishers have to be faced with, please do not accept the application for the salmon fish farm expansion.

Visiting **Beach Meadows, Nova Scotia** remains a trip to look forward to, right here in Canada, so why tarnish it to expand it with a huge 60 pen site to farm salmon ?

This would be a shame, please listen to local concerns and decide *against* this fish farm expansion.

Sincerely,

Dianne Muldoon

Laurie Wyatt
[REDACTED]

Mill Village, NS [REDACTED]
[REDACTED]

22 January 2024

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

Via email: Aquaculture.Board@novascotia.ca

RE: The application by Kelly Cove Salmon Ltd. [KCS] for a Boundary Amendment and Two New Marine Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon – AQ#1205x, AQ#1432, AQ#1433

I have lived in Queens County for most of my 58 years. I frequent Beach Meadows beach as it is my grounding sanctuary. The beauty of the ocean together with the shore line is one of our greatest assets. If there's one thing we have learned from the Covid pandemic, it is that the world values low populated areas with outdoor spaces. If you love outdoor recreation, open sea, and beautiful beaches, then Queens County Nova Scotia is the place for you. As a long-time resident I enjoy hiking forest trails, kayaking waterways and beachcombing. This is what keeps me in the area. Yet as I look out across the water toward Coffin Island, I can't help but wonder what is happening beneath the surface.

I am fully opposed to the expansion, licenses, and leases of all three sites in Liverpool Bay. For the purpose of this letter, I will try to stick with the points as they relate to Section 3's 8 Factors. Following is a list of my most pressing concerns, some of which are relevant to more than one factor:

- 1. THE OPTIMUM USE OF MARINE RESOURCES: overall effects impacts, not the best use of marine resources**
 - a. Area 33 is among the richest lobster grounds in the world. Introducing anything that would put that in jeopardy would be short-sighted, reckless, and not in the best interest of our marine resources.
 - b. Tourism and real estate will also be negatively impacted in the region. I feel that increasing the number of open pen fish farms would lower the appeal given how unsightly and noisy they are.
 - c. There is a growing body of scientific evidence that shows salmon hatcheries to be a poor use of public funds that often harm wild fish.
- 2. THE CONTRIBUTION OF THE PROPOSED OPERATION TO COMMUNITY AND PROVINCIAL ECONOMIC DEVELOPMENT: employment details and contributions, or adverse impacts to local and provincial economy**
 - a. I can see in the application, it is predicted to create 20 new jobs. This is not a strong selling point. What negative consequences will there be when hundreds of fishers are no longer able to make a living? What happens to our tax base then?

- b. The website of Cooke Inc., the parent company, reports a revenue of CA\$4 billion annually. How much of that money is allocated to restoring the seabed beneath and surrounding their open pens? How much is allocated to removing the sludge that washes up onto the shoreline?
- c. The list of donations, outlined in the application, that have been made to local community events by Cooke Aquaculture is but a minor advertising/marketing expense for them. A small price to pay for all the damage they cause. I'd like to know how they intend to contribute to our economy, aside from the 20 employees that will be paying taxes, if they live in Queens County, that is.
- d. Why would we allow private companies to make profit from our natural resources whilst simultaneously destroying it? Especially since they do not have to be held accountable for any damages. Will this expense fall to the taxpayers?

3. FISHERIES ACTIVITIES IN THE PUBLIC WATERS SURROUNDING THE PROPOSED AQUACULTURE OPERATION: all types of fishing activities and potential impacts on other species and their habitat in the area

- a. The waste [faeces and feed] that accumulates beneath the pens is known to be toxic. These wastes can change the chemical make-up and biological diversity of the seabed. This will surely be detrimental to all marine life both plant and animal.
- b. By the time we see the impacts of accumulated waste and chemicals on our lobster fishery, Irish Moss harvest, mussel farms, etc. it will be too late.
- c. Beach Meadows beach is a protected area for the endangered Piping Plover. It seems to me that we are putting them at greater risk by allowing open pen fish farming in the area at all –they use chemicals and antibiotics to fight against the pathogens and diseases that go hand in hand with open pen fish farming, these also cannot be contained.
- d. Speak with anyone who frequents the beach and they will tell you how much garbage from the fish farm litters the beach. That is so discouraging to see. My grounding sanctuary, that is meant to be uplifting and restorative and available to all, is now a sad reminder of how little control the individual has over large profit driven industry.

4. OCEANOGRAPHIC AND BIOPHYSICAL CHARACTERISTICS OF THE PUBLIC WATERS: depth of the water and how this has been accounted for in location and design

- a. The harbour does not have the depth required for proper flushing, this is measurable and has been proven.
- b. The applicant is not required to treat or remove the waste.
- c. This will have negative, even devastating consequences.

5. THE OTHER USERS OF THE PUBLIC WATERS SURROUNDING THE PROPOSED AQUACULTURE OPERATION: recreational sites, birds, marine mammals, and other wildlife may be impacted

- a. The last time I went into the water at Beach Meadows, I had a skin reaction when I entered the water. This makes me question what is in the water in such concentration that it would cause my body to have a reaction, and what must it be doing to the wildlife that live in the water or eats things that live in the water.
- b. Present generations of Nova Scotians have a responsibility to future generations to preserve and protect their right to a healthy environment. This method of farming is not conducive to a healthy environment.

6. THE PUBLIC RIGHT TO NAVIGATION: impacts of the waterway

- a. The proposed expansion and additional sites will make the harbour more congested, making navigation difficult for sailors, not to mention less serene.
- b. I believe this expansion would be an invasion of the general use of public space and resources.

7. THE SUSTAINABILITY OF WILD SALMON: measures proposed by applicant in regards to recovery, restoration, and containment efforts

- a. Open pen fish farming is not new. History has shown us of the risks to **the environment, to the health of the wild salmon population, and other marine life**. We have seen devastation in every region around the globe where this method of fish farming has been done. There are no happy endings.
- b. In a news article following a large storm, I read a quote from the applicant that said no fish had escaped from the pens. It is impossible to make such a claim and speaks to an unwillingness to be transparent.
- c. Farmed salmon are a threat to wild populations. When escapees breed with wild fish, they water down our wild fishes' ability to survive. No one's really talking about this, even though we know our wild salmon numbers are plummeting in many places.
- d. And no one's talking about the fact that salmon farms don't have to report "small escapes," which means there's conceivably a constant flow of farmed fish infiltrating our wild waters. It takes an inconceivable amount of time for fish to adapt to their environment, the way our wild fish have adapted to the specific temperatures, pH, seasonality, flow rates, and more. They pass that DNA along to their offspring so they can thrive here too. While hatcheries are sometimes necessary to save endangered stocks from extinction, hatchery-bred salmon are genetically inferior and pollute the wild gene pool, making wild fish less resilient to climate change and other stressors.
- e. I understand the applicant conducts regular and routine monitoring of the penned fish for health issues. Are they required to conduct the same for fish outside the pens to see how they are being affected? I would like to have access to these reports.
- f. There are very serious diseases found in Farmed Fish.
 - i. Infectious Salmon Anemia [ISA] is so serious that it is an International Reportable Disease and is being compared to smallpox and the bubonic plague.
 - ii. Salmon Alphavirus, which caused pancreas disease. This virus, if identified, requires that the entire population be killed off in the same way as with Mad Cow.
 - iii. The Piscine Reovirus, which **affects 80% of ALL open pen farmed salmon**, is linked to a host of health problems for fish, including heart and skeletal muscle inflammation, causing heart attacks and hemorrhaging of the internal organs. It is highly contagious and since 2011 it has been detected in wild Cutthroat and Steelhead trout, as well as wild Chinook, Sockeye, Coho and Chum salmon. It is believed to be the biggest cause of PRE-SPAWN MORTALITY.
 - iv. As I researched this topic, I was horrified by the graphic images and appalled to learn that diseased salmon have been found for sale in grocery stores and restaurants. One has to wonder what effects ingesting these viruses can have on people over time. I doubt there has been any studies to support it is safe for

yourself why it is that The Canadian Blood Services will NOT accept blood donations from any person that has been in Europe during the outbreak of the Mad Cow epidemic so many years ago. These people remain forever rejected from being a donor.

- v. I am also very concerned about the dangerous parasites and pathogens that open pen farms cannot capture or control. If we want to protect the sustainability of the wild salmon population, we have to move to closed-pen fish farming. Period.
- g. Given the applicant's record of non-compliance, I do not have confidence that they will abide by proper guidelines and regulations.

8. THE NUMBER AND PRODUCTIVITY OF OTHER AQUACULTURE SITES IN THE PUBLIC WATERS SURROUNDING THE PROPOSED AQUACULTURE LOCATION: cumulative impacts that may result

- a. We need to consider other livelihoods in this area. Livelihoods of Nova Scotians who work, live, and contribute to the area. We cannot sacrifice the many for the few.
- b. During the Cohen Commission ISA Hearings, evidence and testimonials were given from top world specialists from the World Reference Labs, and from the Head of Molecular Genetics for the Department of Fisheries and Oceans to support the presence of disease in farmed fish. These diseases pose a tremendous risk that reach beyond that species.
- c. More recently, DFO has confirmed that escapees from fish farms are positively harming wild populations of salmon.
- d. We need to engage the Precautionary Principle which clearly states that there is a social responsibility to prevent harm, when it is within our power to do so, even when all the evidence is not in. It takes into account our social responsibility to protect and steward our environment. The Precautionary Principle has been codified in Canada's Oceans Act and several international treaties that Canada is signed onto.

Please do not detract from whether or not I have placed each concern appropriately. My concerns are both valid and relevant. As I stated in 5b, present generations of Nova Scotians have a responsibility to future generations to preserve and protect their right to a healthy environment. If it were up to me alone, I would not only say NO to the expansion, I would have the existing pens removed. They are a hazard in every regard. There are other alternatives that are more environmentally responsible. I will never be confident enough to eat fish from open pen farming, nor will I ever serve it to my friends and family. I do hope that my concerns are taken into consideration, and that the application by Kelly Cove Salmon Ltd. is undeniably and irrevocably rejected.

Kindest regards,

A black rectangular box redacting the signature of Laurie Wyatt.

Laurie Wyatt

RECEIVED

By Nova Scotia Aquaculture Review Board at 12:26 pm, Jan 24, 2024

NSARB-2023-001-WRT-009

LaHave River Salmon Association

[REDACTED]
Bridgewater N.S.
B4V 2W6



To: The Clerk of the Nova Scotia Aquaculture Review Board

I am writing on behalf of the LaHave River Salmon Association, to express significant concern about 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.

This project will result in additional domesticated Atlantic salmon being stocked in existing, newly approved, and pending cage sites, including in places where the industry is not currently present and the status of rare and threatened wild fish populations is unknown.

The salmon aquaculture industry has had severe negative effects on wild Atlantic salmon and the environment in Atlantic Canada. Peer-reviewed studies on escapes and interbreeding, and mass pollution events like the 2019 Mowi mass die-off are examples.

Everywhere open net-pen salmon aquaculture exists in Atlantic Canada, wild Atlantic salmon are considered threatened or endangered by the Committee on the Status of Endangered Wildlife in Canada, including the southern upland population found on the Southwest coast of Nova Scotia. This expansion will put more rivers, including the LaHave River, which has recently seen an increase in wild fish at risk of collapse and extirpation.

As an organization dedicated to the preservation of this iconic species, it is disturbing that the Review board is entraining the proliferation of a known threat to a threaten species. Hundreds of people in organization such as our own, dedicate an invaluable amount of time to enhancing wild Atlantic salmon stocks. A project like this undermines all of this effort.

We are urging you to not allow this expansion in Liverpool Bay.

Thank you for your time.

Jamie Mason
(President)
[REDACTED]

NSARB-2023-001-WRT-010

January 27, 2024

[REDACTED]
Liverpool, NS

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

Dear Nova Scotia Aquaculture Review Board,

**Re: Kelly Cove Salmon Ltd. Application for a BOUNDARY AMENDMENT and TWO NEW
MARINE FINFISH AQUACULTURE Sites – AQ#1205x, AQ#1432, AQ#1433 in Liverpool
Bay, Queens Co.**

I am writing this letter to express my opposition of this application for expanded and new fish farms in Liverpool Bay. I am asking that ARB deny these applications. I do not think the costs at the community level outweigh the possible benefits.

As a long time, home builder and small business operator in Queens Co, who employs 4 to 6 workers, the contribution economical to the community is limited and will hurt my home building business. I know that I need to express my opposition based on the regulations. Section 3 has the following items that are related to my opposition:

- a) the contribution of the proposed operation to community and Provincial economic development;
- b) the other users of the public waters surrounding the proposed aquacultural operation;
- c) the public right of navigation;

The shoreline where these fish farms will be placed are prime real estate. Property values and therefor home build values will suffer from the placement of these farms. Potential new home builders are not going to want to look at this type of industrialized operation out their windows and properties. Some of the properties views will have clean lines of sites of all three sites. People who would be interested in using the bay for personal boating and other recreational activities will have their choices greatly limited.

For these reasons I oppose the applications and strongly encourage the ARB to deny these applications.

Sincerely,

[REDACTED]
George Williams
Home Builder

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:34 pm, Jan 29, 2024

NSARB-2023-001-WRT-011

From: [Linda Lippa](#)
To: [Aquaculture Review Board](#)
Subject: Fwd: Section C - Fisheries and Activities - Site / Lease # 1205X, 1432, 1433
Date: January 27, 2024 3:44:06 PM

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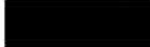
From: Linda Lippa [REDACTED]@novascotia.ca
Date: January 27, 2024 at 2:40:51
Subject: Fwd: Section C - Fisheries and Activities - Site / Lease # 1205X, 1432, 1433

To: aquaculture.board@novascotia.ca

Linda & Tony Lippa



Toronto, ON



RE: Section C -Fisheries and Activities - Site /Lease # 1205X, 1432, 1433

Dear
Chairperson(s), Board members:

Beach

Meadows, Nova Scotia has been one of my travel destinations for years and is such a beautiful, clean, quiet beach. We have had several opportunities to walk this pristine beach and take in the awesome views of the huge rocks, clean sand and mighty water. During our visit we were also able to hire a lobster fishing boat to take us out into the waters. Lobster is not my type of food; however, I did try it and have to say it tasted so much better coming from the fresh ocean waters of Nova Scotia.

On one occasion while walking the beach, we had a chance to talk to the locals (such friendly people) who explained the possibility of an open pen fish farm expansion. As a tourist/visitor, it is truly upsetting to hear that there is a chance of an expansion to the salmon fish farm cages.

Why would anyone want to destroy the waters by doing this ? We were told that they would put the fish farms right on top of where they lay their traps in the springtime. To hear of this possible project; would be a terrible concept for both the locals who love their pristine beach and to those who can escape to this wonderful beach/water.

By allowing **non-local fish farm industries to profit**; will only destroy the tourism and economic dependence of the locals. These non-local fish farm industries have little or no respect for the locals and the clean waters of Nova Scotia.

The application for the open pen salmon fish farm expansion should not be carried out; so that the lobster industry continues to thrive, which is one of the wonderful things that brings tourists to the great waters/province of Nova Scotia.

Please accept our letter to support the locals of Beach Meadows, Nova Scotia and listen to the local concerns and decide against this open pen fish farm expansion.

Sincerely,

Linda and Tony Lippa

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 27, 2024 3:56:42 PM

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Jacqueline Leach

[REDACTED]
Liverpool, NS
[REDACTED]

January 18th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a newer resident to Queens County, and I have to say I'm rather shocked that the province is considering moving forward with this application for expansion of the Kelly Cove Salmon site. I have been reading up on this application and I do have a view of the operation from my windows as I live a few blocks from the waters edge. I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations and I don't understand why it is being considered when they have not respected the obligations of their current lease.

I have been actively trying to find out why the province would entertain this idea because these are the issues I see as being most concerning:

- 1) The beauty of the beaches in this area of Nova Scotia is outstanding and I would imagine one of the highest selling points for tourism in the province. The debris over the years and affect of the waste from increased numbers of fish will have a terrible effect on Beach Meadows, an area that I love and use regularly. NS Aquaculture License & Lease Regulations – Section 3 – Factor 8
- 2) Storms that I have seen since being here, can and have disrupted the integrity of the pens and therefore expose the wild fish populations to salmon infected with high rates of sea lice from farmed salmon that escape the nets. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7
- 3) I have heard that jobs are the reason that the province would support this expansion, yet I can't find any information about how many local people are employed at this operation. As I understand it, the workers that are there are coming from away and/or, the work is mainly automated currently. On the other side of the argument, I worry about the local lobster fisherman who I see out in their boats, who will very likely not be able to lay their traps where these expanded pens are. What about their jobs and livelihood? NS Aquaculture License & Lease

Regulations – Section 3 – Factor 3

4) I no longer buy farmed salmon because what I have learned through this process makes me feel like this is not a sustainable option, it is not good for my health, and it is not good for the natural population of fish in the sea.

Exposure to the fish affected by sea lice, the chemicals used to control illness in these farmed fish and the fact that this may be putting natural populations of sea life at risk should be enough of a concern to stop this practice and any thought of expansion. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

In conclusion, there isn't an area to register a complaint about how I feel this will negatively affect my quality of life in Queen's County but that is what I am expecting as a resident. I do feel that those who are making these decisions are putting at risk so many of the natural elements of our environment here and again, for no real benefit to the people of Queen's County and Nova Scotia. I want this expanded application stopped, if they break this beautiful place, it may not be repairable.

Sincerely,

Jacqueline Leach

From: [Cindy Kyle](#)
To: [Aquaculture Review Board](#)
Cc: [Premier](#); Kim.maslandmla@gmail.com; ministerofred-ministreduder@ised-isde.qc.ca; dfo.minister-ministre.mpo@dfo-mpo.gc.ca; leader@greenpartyns.ca; dnorman@regionofqueens.com
Subject: NS Aquaculture License & Lease Regulations, Lease # 1205x, 1432, 1433 - Section 3
Date: January 27, 2024 6:42:48 PM

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In reference to the NS Aquaculture License & Lease Regulations, Lease # 1205x, 1432, 1433 - Section 3

Our concerns that specifically impact myself and my family are related to Factor 5 - "The other users of the public waters surrounding the proposed aquaculture operation".

I am a daily walker of Beach Meadows and surrounding area beaches with our family dog. In the summer we often spend the day enjoying the facilities at Beach Meadows beach (which have recently been expanded). Every summer our adult children and grandchildren come to visit from out of province and we take them to Beach Meadows beach often where there are washrooms, change facilities, boardwalks for safe beach access and picnic facilities. The beautiful long stretch of sand beach makes it a great beach for recreational swimming, playing, walking, boogie boarding, sand castle building etc. for our visitors and ourselves. The Open pen fish farm currently existing off Beach Meadows beach is only 200 meters from shore and causes us concern for the safe condition of the water and debris and pollution washing ashore to the beach. I have personally witnessed waste that accumulates during certain phases of the production process, it is disgusting to say the least.

The existing pens are a terrible eyesore to our beautiful shoreline, I am sad and angered at the thought that MANY more of these pens will be allowed in the area. If there is an expansion I will NOT be taking my children and grandchildren to Beach Meadows Beach and am cautious to take them even now with the existing fish farm. The existing pens already present an eyesore of our beautiful coastline and with the proposal of additional open pens who will want to even look out at our ocean!

People purchase property in the area to enjoy the beautiful coastline and beaches, who will purchase here if more of these negatively impactful fish farms become

even more visible and impactful to the shoreline. Current property values will certainly decline if no one wants to purchase in the area, including our property that is close by. It will affect my family financially as well as the decline in our recreational activities.

We recently looked to purchase a piece of property for sale on the shoreline of Brooklyn to build a rental vacation property for others to enjoy the beauty of the area coastline and beaches. After reviewing the possibility of additional fish farms being proposed just off shore in the area, we decided not to pursue the purchase of that piece of vacant land. What a shame for the impact of financial loss to the community that otherwise would have been generated by bringing tourists to the area to spend their dollars! We are no longer looking to purchase any property in the Liverpool Bay area or to any locations in Queens County unless this approval for expansion is declined.

Why is Nova Scotia allowing the destruction of our ocean waters, marine life and beaches for corporate financial gains? British Columbia has already put a "whoa" on Open Pen Salmon farms and is moving to land based fish farms to protect their waters and coastal environment while still maintaining the growing demand for salmon as a food source for humans. The provincial government of Nova Scotia is actively promoting tourism and a 'move to Nova Scotia' campaign has become the focus of Nova Scotia's growth. Why destroy the best thing that Nova Scotia has to offer, beautiful, clean oceans and beaches!

Cindy and Ken Kyle

[REDACTED]

Eagle Head, NS

[REDACTED]

Cindy Kyle

[REDACTED]

**Healthy Bays**
NETWORK**WRITTEN STATEMENT From Healthy Bays Network****Re: AQ1205 (Coffin Island), 1432 (Brooklyn), 1433 (Mersey Point)****January 29, 2024**

The Healthy Bays Network is a community-driven alliance of provincial organizations with a shared vision for healthy bays, free of open net-pen aquaculture in Nova Scotia. Recognizing the autonomy and individual needs of each organization, our intent is to work together, to share information, resources, and to develop and execute strategies to realize our common goal.

Factors to be addressed:

1. The optimum use of marine resources
2. The contribution of the proposed operation to community and provincial economic development

Coastal communities around the province are concerned by the way that the Aquaculture Review Board (ARB) has functioned to date.

The choice of intervenors chosen or not chosen are very arbitrary and do not allow for a full analysis of the application. When the Ecology Action Centre is not able to intervene there is not a full presentation of the environmental effects of this application both locally and provincially. When the Chamber of Commerce is not accepted as an intervenor we don't hear from businesses whose livelihoods may be at risk and/or affected. When expert witnesses like Doug Frantz and Catherine Collins are not allowed to intervene the questions about the sustainability claims of the proponent cannot be cross examined.

HBN believes that this application is not the optimum use of the marine environment and that the outcome of this application has provincewide effects. Beyond the decision of these 3 lease applications this Board is set to rule on several applications that would quadruple the number of marine based fish farms in this province. The standards set by this hearing will be used as precedent in future hearings. This means potentially increased levels of escapes, which means a very real threat to an already endangered wild salmon population. It means potentially more cases of sea lice and disease outbreaks, more antibiotic and pesticide use, and much more waste, buildup of dead fish, feed and feces in our public waters. Our coastal communities are dependant on healthy harbours for the wildcatch fisheries and tourism

industries that sustain us. If the wider effects of a lease on our coastal waters are not in the Board's purview, then where should they be considered?

Our organization believes that it is vital to evaluate the history of a company in assessing the license application and yet this information has been disallowed by this Board. Lease # 1205 is one of 4 leases in this province that have operated for many years outside their boundaries. Kelly Cove Salmon operated in the Aquaculture Management area where at least 300 fish escaped in December 2023 in the Bay of Fundy and this went unreported to the public for 4 weeks so that nothing could be done about it. This same proponent had fish escape in August 2023 in the Bay of Fundy; reporting it 3 weeks after they were first detected by the Atlantic Salmon Federation. They had 50,000 salmon escape from a Cooke cage in Maine in early August 2023. How is it that the history of the operator and the inability of the department to regulate are not considered relevant in evaluating an application? Fish escapes put local endangered populations of wild salmon at risk. The population of Inner Bay of Fundy Salmon has declined by 95% since the 1980's when fish farms in that area were expanding.

The Healthy Bays Network is part of a global movement of people who because of their experiences and knowledge are opposed to this industry operating in our public waters. The issues and concerns about this industry are the same around the world. It is thus very disturbing that in the creation of our regulations and in the process of the ARB reviews of applications that none of the history and experiences from around the world are examined.

Finally the issue of social license is not assessed in this process. Whether a community wants a development or not has no bearing on the outcome of the application before the Board. Despite the recommendation by Doelle Lahey to have a review board hear community concerns and complaints, we have an ARB that fails at including important stakeholders in the process, forces communities to pay for and go through an arduous legal process to adequately present their case, and gives no weight to social license in the decision making.

The DFA has said that they support low impact, high value aquaculture development in this province. This application does not meet that definition. The provincial government said that they will listen to the concerns of Nova Scotians. If that is the case this application will be denied.



Wendy Watson Smith, President
Healthy Bays Network

RECEIVED

By Nova Scotia Aquaculture Review Board at 2:24 pm, Feb 04, 2024

From: [Trisha Muldoon](#)
To: [Aquaculture Review Board](#)
Subject: Liverpool Bay, Site #1205, 1432, 1433
Date: February 2, 2024 5:18:17 PM

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****I would like to retract my former letter (via email) and re-submit the following below.****

To: ARB

From:
Alexander Ross
[REDACTED]
Hamilton, Ontario
[REDACTED]

Dear Chairperson and Board,

RE: Section C - Fisheries and Activities

I was a visitor in Liverpool Bay (Lease Sites: 1205, 1432, 1433) this past summer - July 2023. I stayed in a guest house directly on the coastline. The views of the Atlantic ocean, from Beach Meadows, were absolutely breathtaking.

During my visit I walked the beach several times a day admiring the sand, rocks, seaweed, and shoreline. I was quite surprised to notice pieces of Styrofoam that had washed up on the shore. I saw first hand the devastating consequences of the salmon fish farms. A family member described to me, visibly frustrated, that the farms also disrupt the local lobster traps and fisherman.

I did more research once I returned home to look into what was going on. I want to support my family and the local community whom I met during my stay in Liverpool Bay.

Please do not accept this application for expansion, based on the research and devastating consequences of what local fishermen and residents are experiencing.

I would like to visit Nova Scotia again in the near future, but I am quote rattled by the potential expansion of a 60-pen farmed salmon site. This will have lasting effects on the existing genetic diversity and survival of the native salmon species. Furthermore, I saw firsthand the waste and pollution from the industry. The people of Beach Meadows are extremely upset. They do not want to hurt local lobster and fish industry, and the habitat.

Please listen to the local community and visitors like myself.

RECEIVED

By Nova Scotia Aquaculture Review Board at 4:10 pm, Jan 29, 2024

NSARB-2023-001-WRT-016

Renate Baldwin

██████████
Moose Harbour, Queens County N.S.
██████████

January 28, 2024

Clerk of the Board

Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

Via email: Aquaculture.Board@noascotia.ca

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 this letter on my own behalf in opposition to the captioned application. I am a resident of Queens County at the above address and have been living here for almost 2 years.

I am a concerned residents that loves the nature and the surrounding waters here at the south shores of Liverpool. The reason I moved to this area was how untouched it is and how beautiful the beaches are. The numerous bird species (Piping Plover core nesting habitant at Beach Meadows, Harlequin Ducks, Bald Eagles, just to mention a few) that are starting to migrate back to this area and considered at risk, are making this their home. The seals in the area and sharks that have been cited here this summer.

The tourism that brings people from all over to our beaches, whether they are surfers, swimmers, or families that want to spend the day at the beach.

When we are looking at the climate change that is happening around us. Even within the 2 years that I have been living in this area I have noticed that there are increased windstorms. The sizes of waves are so powerful, that it has taken out part of a cement block wall just down the road from me in Western Head. If it can take out a cement block wall, what would it due to fish pens.

The optimum use of marine resources- It is difficult to understand how restricting the area to single use open net pen cages can be considered as optimal use, when there are so many other existing uses as lobster fishermen, indigenous lobster fishermen, sports fishermen, Irish sea

moss harvesters, surfers, pleasure boating. What could be considered more optimal than what the area is presently used for.

The open pen net fish operation does not contribute to the sustainability of wild salmon. There appears to be proof that concentration in cages increases disease which cannot be contained. For example, fish lice, which would affect the wild salmon and other species that feed on fish.

The existing cages in 1205 which is significantly more protected being somewhat hidden by Coffin Island, have been broken up or apart by storms, resulting in the release or kill of the penned salmon. When the existing pen broke apart years ago, pieces of it landed on the shore line located adjacent to the Western Head Lighthouse where they remained for months. Dead Salmon hauled from the Coffins Island site in March 2019 due to suspected cold temperature issues.

The depths of cages are uniformly 9 meters including the predator net in all three locations.

The average depth of the sides according to the Notice of Works filed under the Navigation Protection Act Canada forms are:

Mersey Point 7 to 20 meters

Brooklyn 6-20 meters

Coffin island 8-20 meters

That indicates that the depths under the cages range from -3 meters to +11 meters. I see that as a flushing issue.

Location 1433 would make access to the shore line difficult to Irish sea moss fishers, assuming the moss still grows. Sea grass is often described as ecosystem engineers for their ability to modify their physical, chemical, and biological environment. Harvesting seems to be decreasing and this possibly due to the pollution from the fish farm.

The surfers would not have sufficient distance from the boundary of the pen to the shore line to allow for safe rides. To my knowledge there are surfers coming from Australia every year to enjoy the waves here in Liverpool Queens County.

Kelly Cove Salmon Ltd had been fined \$500 000 for illegal use of pesticides in the Bay of Fundy, \$332 000 penalty for pen collapse in Puget Sound, \$2.75 million over a net pen collapse, US \$156,213 for a number of incidents at its net pen sites in Hancock and Washington counties, including having too many fish in pens, failing to conduct environmental sampling, and failing to follow a number of procedural measures laid out in the company operating permit, including on-time filing of pollution sampling reports and fish spill prevention plans.

Extract from WBA Report

The World Benchmark Alliance reports Cooke Aquaculture ranks 27th out of 30 global seafood companies. The Index measures how the world leading seafood companies contribute to the sustainable management of our oceans and coastal ecosystems. Despite people around the world relying on the seafood industry for employment, sustenance and wellbeing, large companies are failing to provide sustainable and equitable food systems that also protect and **restore oceans.**

Having this information, I am as a resident of Moose Harbour, Queens County **why would I** want to have this kind of operation here at my front door. Nova Scotia is known for its coastlines and beauty, is this something we want to give up for these big companies that don't consider the environmental impact to our coast, species and people that live here in our community.

If this project goes ahead and **I hope not**, this won't be the last fish farm along the coast and our coast lines will be known not for its beauty instead of the fish farm pollution.

Let's make the right decision for our province and economy, ocean and wildlife and environment. We are always talking about how we have to make changes to protect the environment and climate change. Let's preserve it!

Thank you for taking your time to hear my concerns.

Yours Truly

Renate Baldwin

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:24 pm, Jan 30, 2024

NSARB-2023-001-WRT-017

30 January 2024

Suzanne Morton

[REDACTED]

Port Medway, NS

[REDACTED]

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

Dear Clerk,

I am a resident of Port Medway writing with regard to the “boundary amendment” of AQ#1205x, Coffin Island and the establishment of two new marine finfish aquaculture licenses and leases in Liverpool Bay (Namely AQ#1432 (Brooklyn) and AQ#1433 (Mersey Point), Liverpool, Queens County, Kelly Cove Salmon Ltd.). I oppose all three applications that if granted would increase the number of farmed fin fish in the Bay by 370 percent. My concerns are as follows.

2) The contribution of the proposed operation to community and provincial economic development

The expanded presence of open pen fin fish farms would have a negative economic impact. The proposed “boundary amendment” is adjacent to Beach Meadows Beach, a spectacular white sand public beach and one that the Region of Queens has recently prioritized with new tourist infrastructure through the construction of public changerooms and washrooms. The view from this public coastal property is already marred by the existing lease. Past storms have led to its waste washing up on the mile-long, fine sand beach. Debris from the farm washed up on the beach as recently as the fall 2023. Queens has had an important tourist sector for over a hundred years and there are efforts by organizations such as South Shore Tourist Cooperative to encourage a year-round season based on “the coast.” An open pen fin fish farm should not be located directly adjacent to one of the great and accessible public beaches on Nova Scotia’s Atlantic coast. Part of the Nova Scotia and local branding for tourism is strongly link to nature and yet the proposed expansion is only 250 metres from a provincially-designated nature reserve on Coffin Island.

3) Fisheries activities in the public waters surrounding the proposed aquaculture operation

All licenses and leases are in lobster fishing and public boating areas. The 2021 DFO report recognized that all three were active areas of lobster fishing. Although you can make correct larger claims about the general health in LFA 33 as a whole, this claim matters little for individual local fishers. The lobster fishery is an intensely local fishery and it is equally governed by official regulations and local customs. One of the most important aspects of the “informal law” is a community-based understandings based on local ecological knowledge so that certain fishers usually fish specific shoals. (I taught Atlantic Canadian history at McGill University for over thirty years and have been recognized by DFO as an expert reviewer on matters connected to the historic lobster

fishery in the region.) The establishment of new leases and licenses and the expansion of the Liverpool site will negatively impact adjacent local fishing communities.

4) Oceanographic and biophysical characteristics of the public waters

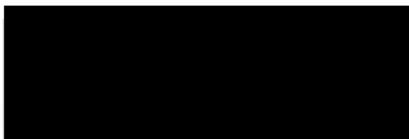
This is not a sensible location of any of the open pen fin fish farms as the water is too shallow, the location is exposed to storms and sea surges, and the DFO 2021 scientific evaluation report described the bottom habitat for all three sites as the hard-bottom substrates preferred by larval lobster.

The shallow water is a threat to the fish with the temperature extremes of climate change and the presence of polar vortexes generate super chill events. In Winter 2019 10,000 salmon died at this location as a result of the water being too cold. An interview with a Kelly Cove spokesman at the time indicated that this was to be expected every five years. The shallow water may also contribute to the concentration of food and feces under the cages.

Coffin Island offers little protection to the open Atlantic and the DFO (2021) noted that while it could not predict wave action for the proposed site, there appeared to be vulnerability especially from the east and southeast. There is no question about the increasing strength of storms and sea surges and these leases and licenses are situated in locations with little protection. The washing ashore of a large pillar buoy at nearby East Berlin this fall is evidence of the difficulty of keeping anchored infrastructure in place as the oceans change. (Most local people of a certain age remember the escape of 500,000 rainbow trout associated with Post Tropical Storm Noel in 2007 and the spring 2010 attacks by seals that tore holes in the cages that raise concerns about fish escaping and disrupting local ecologies)

I want a future that is both prosperous and environmentally sustainable. The expansion of AQ#1205x, Coffin Island and the establishment of two new marine finfish aquaculture licenses and leases in Liverpool Bay (Namely AQ#1432 (Brooklyn), AQ#1433 and (Brooklyn), AQ#1433 (Mersey Point), Liverpool, Queens County, Kelly Cove Salmon Ltd.) is not the way to get there.

Sincerely,

A black rectangular box redacting the signature of Suzanne Morton.

Suzanne Morton

Cc

Honourable Kim Masland, MLA Queens Kim.maslandmla@gmail.com

Honourable Steve Craig, Minister of Fisheries and Aquaculture stevecraigmla@gmail.com

Premier Tim Houston premier@novascotia.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:25 pm, Jan 30, 2024

NSARB-2023-001-WRT-018

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#); [Aquaculture Review Board](#)
Cc: [Karen Miller](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 1:52:29 PM

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Ron Miller
[REDACTED]
Liverpool, NS
[REDACTED]

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a resident of 25 years of Queens County, and I have to say I'm rather shocked that the province is considering moving forward with this application for expansion of the Kelly Cove Salmon site. I have been reading up on this application and I do have a view of the operation from my windows as I live on the waterfront approximately 200 feet of from the exposed site. I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations and I don't understand why it is being considered when they have not respected the obligations of their current lease.

I have been actively trying to find out why the province would entertain this idea because these are the issues I see as being most concerning:

The application by KCSL description the depths of the locations for the proposed cages raises reason for concern. The depths of the cages, including the predator nets, are 9 meters; yet the average depths of sites according to the notice of works is under this measurement in all three sites. This would result in a significant flushing issue and is not acceptable. Presence of floating ice in the winter will most certainly contribute in a detrimental way to this problem. NS Aquaculture License & Lease Regulations – Section 3 – Factor 4

2) Storms that I have seen since being here, can and have disrupted the integrity of the pens and therefore expose the wild fish populations to salmon infected with high rates of sea lice from farmed salmon that escape the nets. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

3) I have heard that jobs are the reason that the province would support this expansion, yet I can't find any information about how many local people are employed at this operation. As I understand it, the workers that are there are coming from away and/or, the work is mainly automated currently. On the other side of the argument, I

worry about the local lobster fisherman who I see out in their boats, who will very likely not be able to lay their traps where these expanded pens are. What about their jobs and livelihood? NS Aquaculture License & Lease Regulations – Section 3 – Factor 3

4) I no longer buy farmed salmon because what I have learned through this process makes me feel like this is not a sustainable option, it is not good for my health, and it is not good for the natural population of fish in the sea. Exposure to the fish affected by sea lice, the chemicals used to control illness in these farmed fish and the fact that this may be putting natural populations of sea life at risk should be enough of a concern to stop this practice and any thought of expansion. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

In conclusion, there isn't an area to register a complaint about how I feel this will negatively affect my quality of life in Queen's County but that is what I am expecting as a resident. I do feel that those who are making these decisions are putting at risk so many of the natural elements of our environment here and again, for no real benefit to the people of Queen's County and Nova Scotia. I want this expanded application stopped, if they break this beautiful place, it may not be repairable.

Sincerely,

Ron Miller

From: JACQUELINE LEACH
To: Aquaculture Review Board; Aquaculture Review Board
Cc: [REDACTED]
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 2:24:10 PM

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Douglas Thompson

[REDACTED]
Liverpool, NS
[REDACTED]

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a property owner/resident of 45 years in this area. I have to say I'm rather concerned that the province is considering moving forward with this application for expansion of the Kelly Cove Salmon site. I have been reading up on this application, I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations.

I have been actively trying to find out why the province would entertain this idea, these are the issues I see as being most concerning:

1) Feces, chemicals and antibiotics create a degraded marine environment. KCSL claims to be (and is designated as a 'farm'). Issues of runoff and pollution created by farms are properly regulated to create a clean industry. Where are the regulations in place with the existing fin fish farm AQ1205x? Why is effluent which includes feces and antibiotics allowed to be flushed into our bays twice a day, into the backyards of Nova Scotians? A large percentage of Nova Scotian homes have private and/or community access to our coastline so essentially this effluent will be flushed directly into our backyards. This is not acceptable and, with the new application, the sewage equivalent to 107,000 people piped directly into our bays. KCSL has been fined for illegal use of pesticides in the Bay of Fundy – the precedent has been set. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

2) Proliferation of sea lice and infectious diseases. It has been proven that existing fin fish farms have had ongoing problems with sea lice and infectious disease. The history of fish farms has resulted in millions of escaped fish which has led to a devastating impact on endangered wild Atlantic salmon. NS Aquaculture License & Lease

Regulations – Section 3 – Factor 5

3) Storms that I have seen since being here, can and have disrupted the integrity of the pens and therefore expose the wild fish populations to escaped salmon infected with high rates of sea lice from farmed salmon that escape the nets. The height of waves in our area with hurricane force winds will beat the salmon in the pens. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

4) I no longer buy farmed salmon because what I have learned through this process makes me feel like this is not a sustainable option, it is not good for my health, and it is not good for the natural population of fish in the sea. Exposure to the fish affected by sea lice, the chemicals used to control illness in these farmed fish and the fact that this may be putting natural populations of sea life at risk should be enough of a concern to stop this practice and any thought of expansion. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

In conclusion, the substantial increase in this operation is truly going to risk the enjoyment of my beach walks and swimming at Beach Meadows.

Sincerely,

Douglas Thompson

A black rectangular redaction box covering the signature area.

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#); [Aquaculture Review Board](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 3:09:51 PM

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Loretta M. Cook

[REDACTED]
Liverpool, NS
[REDACTED]

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

Dear Sir or Madam:

At a time when we should be concerned about our environment - why is Cook's Aquaculture's application to triple the size of an existing salmon farm in Liverpool Bay even being considered. As an owner of a cabin on Coffin Island we can attest to the pollution that has muddied the waters around Coffin Island.

A few years ago our children and guests swam and snorkeled around the island we watched the boys and could see them clearly. Now the new generation is snorkeling we can only follow the bubbles to know where they are and they get out of the water covered in slime. So no more snorkeling or swimming in that water. This has to be affecting the wild fish. Who wants to eat fish from Cooke's Fish Farm that are contaminated.

Help us protect our beautiful beaches. Say "NO" to fish farms! Listen to the marine biologists.

We've had guests from all over Canada visiting us and we always took them to Coffin Island and other scenic beaches in the area, they were enthralled with the beauty. The fish farm just off Coffin Island has destroyed that and now Cooke Aquaculture is going to destroy the beaches all along our coasts. I strongly object to this expansion going forward.

Sincerely,

Loretta M. Cook

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#); [Aquaculture Review Board](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 3:22:13 PM

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

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Isolde Savage

[REDACTED]
Liverpool, NS
[REDACTED]

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a 50 year resident to Queens County, and I have to say I'm rather shocked that the province is considering moving forward with this application for expansion of the Kelly Cove Salmon site. I have been reading up on this application and I do have a direct view of the operation from my shore front property. I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations and I don't understand why it is being considered when they have not respected the obligations of their current lease.

I have been actively trying to find out why the province would entertain this idea because these are the issues I see as being most concerning:

In the proposed AQ1433 area there already exists a year-round Aboriginal lobster fisheries as well as active commercial lobster fisheries during the months of November to May which dates back more than 3 centuries. Seasonal activities in these public waters include sport herring and mackerel fishing, general sport fishing and Irish sea moss gathering. NS Aquaculture License & Lease Regulations – Section 3 – Factor 3
The application by KCSL description the depths of the locations for the proposed cages raises reason for concern. The depths of the cages, including the predator nets, are 9 meters; yet the average depths of sites according to the notice of works is under this measurement in all three sites. This would result in a significant flushing issue and is not acceptable. Presence of floating ice in the winter will most certainly contribute in a detrimental way to this problem. NS Aquaculture License & Lease Regulations – Section 3 – Factor 4.

In conclusion, there isn't an area to register a complaint about how I feel this will negatively affect my quality of life in Queen's County but that is what I am expecting as a resident. I do feel that those who are making these decisions are putting at risk so many of the natural elements of our environment here and again, for no real benefit to the

people of Queen's County and Nova Scotia. I want this expanded application stopped, if they break this beautiful place, it may not be repairable.

Sincerely,

Isolde Savage

From: [samuel baldwin](#)
To: [Aquaculture Review Board](#)
Subject: Applications AQ#1205, AQ#1432, AQ1433
Date: January 30, 2024 3:29:18 PM

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January 30th

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

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#1205, AQ#1432, AQ1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a new resident to Queens County to express my adamant opposition to the expansion of the Kelly Cove Salmon site. I moved to Liverpool due to its Natural Uniqueness in Nova Scotia. Liverpool is the only town in all of Nova Scotia where you have world class surfing, an affordable marina (**Section 3- Factor 6**), and a town all within a 5km radius (**Section 3- Factor 1 and Factor 2**). I assure you, that this is the case, I have spent years looking into it. The expansion of the fish farm would compromise this unique beauty of Liverpool, its bay, and the surrounding areas. The effect of the existing fish farm is already felt in the surfing community, as the sedimented fecal matter of the fish there becomes suspended in the water column in storms which bring the best surf to the area. This is a fact that is both smelt, and felt in the water, as after being in the water I have been coated from head to toe in a slime of an awful nature (**Section 3- Factor 5 and Factor 1**). As a new resident, I have dived into the local community, making use of my high level of education to teach in the county schools and take on the treasurer role at the Mersey Point Community Hall. If you hope to bring more people to the community, committed to its success, it is imperative that the natural abundance here is not further contaminated (**Section 3- Factor 1 Factor 2 and Factor 5**).

Other than attracting new residents with the existing natural beauty of Liverpool, It is important to think of the current residents. The expansion of the fish farm would impact the local fisheries including the lobster industry (**Section 3- Factor 3**), both commercial and first nations; decrease existing property values (**Section 3 - Factor 2**) ; render local coastlines unswimmable (**Section 3- Factors 1, 2, and 5**); pollute the new 154 acre Sand Beach Conservation Lands, purchased by the Nova Scotia Nature Trust in 2021 as part of the Twice the Wild Campaign (**Sector 3- Factor 1**); Limit the navigation of the harbour by boaters and tourists (**Section 3 - Factor 5**); require exemptions in the depth of water for operation

(Section 3 Factor 4); and provide no defined path to increased provincial economic development such as new hires, or processing the fish locally **(Section 3-Factor 2)**.

In summary, this is a decisive voting issue for me. I can not stress enough that I moved here to engage in the unique natural beauty and facilitating infrastructure of this town and municipality and participate in the thriving community that is liverpool. There is an opportunity here to have Liverpool become a hub for nature enthusiasts, or to become a town surrounded by an open flow sewer with the equivalent of 107,000 human's waste in the harbour every day.

Sincerely and with Concern,

Dr. Samuel James Baldwin, PhD.

From: JACQUELINE LEACH
To: Aquaculture Review Board; Aquaculture Review Board
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 3:52:18 PM

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Janet Fletcher
[REDACTED]

Liverpool, NS
[REDACTED]

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am writing as a long time resident of Queens County, and I am concerned about the application for expansion of the Kelly Cove Salmon site. My family history is that they owned much of the land that overlooks this area of the bay. I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations and I don't understand why it is being considered.
I am most concerned about the following:

Feces, chemicals and antibiotics create a degraded marine environment. KCSL claims to be (and is designated as a 'farm'). Issues of runoff and pollution created by farms are properly regulated to create a clean industry. Where are the regulations in place with the existing fin fish farm AQ1205x? Why is effluent which includes feces and antibiotics allowed to be flushed into our bays twice a day, into the backyards of Nova Scotians? A large percentage of Nova Scotian homes have private and/or community access to our coastline so essentially this effluent will be flushed directly into our backyards. This is not acceptable and, with the new application, the sewage equivalent to 107,000 people piped directly into our bays. KCSL has been fined for illegal use of pesticides in the Bay of Fundy – the precedent has been set. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

Broken net debris. The frequency and strength of storms in Nova Scotia have resulted in increased debris on our shores. Predator nets in fin fish farm needed to repel birds such as seagulls and eagles are, through necessity, on the surface of the pens making them even more susceptible to damage and destruction during storms than the local fisheries whose nets lie below the surface. This will result in increased net debris on our shorelines and floating in the water – resulting in increased entanglement with resident wildlife as well as recreational boaters. KCSL has been fined for net pen collapse in Puget sound – why would we be willing to wait until this happens – the precedent has been set. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

In conclusion, my expectation is that the ARB members stop this application I do not want this in my community.

Sincerely,

Janet Fletcher

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#); [Aquaculture Review Board](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: January 30, 2024 4:05:09 PM

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Deborah Ripple
Liverpool, NS

[REDACTED]
B0T 1K0

January 30th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I am a 45 year resident of Queens County, and I am concerned that the province is considering this application for expansion of the Kelly Cove Salmon site. I will state now I am absolutely against the ARB approving this expansion of the Kelly Cove Salmon Ltd. Operations and I don't understand why it is being considered.

I have been actively trying to find out why the province would entertain this idea because these are the issues I see as being most concerning:

- 1) The beauty of the beaches in this area of Nova Scotia is outstanding and I would imagine one of the highest selling points for tourism in the province. The debris over the years and affect of the waste from increased numbers of fish will have a terrible effect on Beach Meadows, an area that I love and use regularly. NS Aquaculture License & Lease Regulations – Section 3 – Factor 8
- 2) Storms that I have seen since being here, can and have disrupted the integrity of the pens and therefore expose the wild fish populations to salmon infected with high rates of sea lice from farmed salmon that escape the nets. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7
- 3) I have heard that jobs are the reason that the province would support this expansion, yet I can't find any information about how many local people are employed at this operation. As I understand it, the workers that are there are coming from away and/or, the work is mainly automated currently. On the other side of the argument, I worry about the local lobster fisherman who I see out in their boats, who will very likely not be able to lay their traps where these expanded pens are. What about their jobs and livelihood? NS Aquaculture License & Lease

Regulations – Section 3 – Factor 3

4) I do not buy farmed salmon because what I have learned through this process makes me feel like this is not a sustainable option, it is not good for my health, and it is not good for the natural population of fish in the sea. Exposure to the fish affected by sea lice, the chemicals used to control illness in these farmed fish and the fact that this may be putting natural populations of sea life at risk should be enough of a concern to stop this practice and any thought of expansion. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

In conclusion, I want this expanded application stopped.

Sincerely,

Deborah Ripple

From: [Gill Wu](#)
To: [Aquaculture Review Board](#)
Subject: re the application for licensing by Kelly Cove Salmon Ltd
Date: January 30, 2024 4:25:44 PM
Attachments: [REDACTED]

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I have attached and copy/pasted below a letter outlining the reasons for my opposition to the licensing, and amendments applications by Kelly Cove Salmon Ltd.

Gillian E Wu

copy/paste (and attached) MS Word

Gillian E Wu

[REDACTED]

[REDACTED]

Nova Scotia [REDACTED]

[REDACTED]

January 28, 2024

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

Via e-mail to : Aquaculture.Board@novascotia.ca

Re: The application by Kelly Cove Salmon Ltd for a Boundary Amendment and Two New Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon (*Salmo salmar*, is the species according to GOOGLE) – AQ#1432, AQ1433 in Liverpool Bay, Queens County.

I am writing in opposition of the above typed/named application. I have owned my home [REDACTED], Queens County, since 2001 when its building (by

[REDACTED], Liverpool) was completed. My home is on the Atlantic Ocean (but not on the salmon pens side) and is my retirement home. Aquaculture's presence just a few kilometers around the Head from my home is part of my neighbourhood and part of my life.

I am in opposition to the boundary amendment, and what is essentially an extension of the placement of the salmon growth and maturing "pens" asked for by Kelly Cove Salmon Ltd.

One reason for my opposition is because I have seen how Kelly Cove Salmon Ltd has been running these salmon farms – they do not adhere to the rules laid out in their licenses, they have larger pens that initially agreed to, and they keep skirting the agreement that they agreed to. I know this because I have been on one of the feeding "tugs" and the sailor on the tug joked about the density of the salmon being not something that matters (when I said they looked crowded). (and yet there is a maxim, "it does matter"). The feeding-tug boat workers also said that sometimes fish escape – a fact documented by others. "Farmed salmon" in the Atlantic spreading their genes into "wild salmon". Kelly Cove Salmon Ltd is a business not a wildlife support-conservation group – and businesses have to make money to stay in business and so – rules that can be broken without consequence are broken if need be for profits. It is for profit with no consideration for our Nova Scotia environment, nor for our well-being and nor for attracting visitors and residents that these changes and additions in licencing have been asked for by Kelly Cove Salmon Ltd.

But, I am a birder and a sailor (a day sailor) and it is how the proposed licensing will affect wildlife and sail boats that I will address in the rest of this letter. I am not a business person, nor a legal person. I am someone that loves the Sea, someone who bought and built for my retirement in Nova Scotia because of its beauty, the conservation efforts of the province, Nova Scotia's values, and because of the sensible friendly people. Although of course I am aware personally as to how the fish farms have already polluted our beaches, hurt our reputation as having a welcoming beautiful sea coast, and how the fish farms are against all of us are trying to "protect the environment"

Piping Plovers – we are all working to provide safe nesting coasts for Piping Plovers – during the nesting season we stay away, areas are roped off, dogs are leashed and kept well away. I read that Kelly Cove Ltd agrees to stay away from coasts where nesting of Piping Plovers are being protected. Staying away means staying at least 500 meters away from Plover sites, YET, as I read the material/charts available to us, the proposed expansion sites extend to about 250 meters from land and the Plover nesting areas

(specifically the protected areas on Coffin Island (a Provincial Nature Reserve) and Beach Meadows Beach (one of Liverpool's major tourist sites because it was a pristine sandy beach! Swimming in the Atlantic!!!). I have only written about Piper Plover protected areas, but the Bald Eagles are starting to return, and in the spring Eiders are a harbinger of Spring which lead to residents and visitors coming to Nova Scotia. Wildlife. Wild – not in pens near the coast changing the waters and the coast to the detriment of wildlife and people.

Sailing: The fish farm pens will make it nearly impossible to sail out of the Brooklyn Marina (where I am a member and from where I sail). There are strong currents given the tide (coming in or out) and the Mersey River (streaming down to the Atlantic). Already tacking needs care and skill, experienced sailor even can be pushed to the limit of sail ability with the current pens' positions – the further reduction in the width of the exit channel in the harbour will mean that only motoring in will be possible for good sized sail boats. Is this a trivial reason to not allow more extensive fish pens in the proposed areas – perhaps – but think about Nova Scotia and how we appear to the world and tourists – a harbour, with sail boats, tacking in and out – families – a good place to live and visit – where the environment is protected, where simply “ordinary” people can count on being shown respect and listened too – where companies that propose to destroy our environment (bringing ugly polluting, disease promotion, farmed salmon escaping, fish pens!) for money. That somehow Kelly Cove Salmon Ltd's desire to make money is more important than the protection of Nova Scotia. Not trivial. Surely the Nova Scotia government and you want to protect Nova Scotia's coastal waters for animals, fish and people, want to maintain and increase Nova Scotia's appeal to people around the world (and yes visitors and new residents bring in money to us), and to do all possible to help fight the earth's environmental crisis.

I love Nova Scotia, I spend all my money here, locally, easily, pleurably. This fish farm issue has made us all realize how we could lose what we have if these licenses are granted and/or amended. Others can write more analytically than can I – but know, the additional salmon pens and the amended areas for the pens will turn us towards being a place no one wants to live – we will lose residents who have enough assets to build and buy and spend, we will not attract families looking for a healthy clean environment. It will be the start of our loss of pride in our community, a loss no government wants to be responsible for, (is Kelly Cove Salmon Ltd's plan a plan for Liverpool Harbour that serves all of us who love Nova Scotia).

Please do not pass or do not allow these licenses to be allowed or issued.

Thank you,

Gillian E Wu

[REDACTED]

[REDACTED],

NS, [REDACTED]

January 30, 2024

Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

E-mail: Aquaculture.Board@novascotia.ca

To: Clerk of the ARB

Re: AQ#1205, AQ#1432, AQ#1433

The application by Kelly Cove Salmon Limited for a boundary amendment and two new sites in Liverpool Bay, Queens County.

Dear Sir/Madam,

I wish to go on record as opposing the above-noted application by Kelly Cove Salmon. I am submitting my views based on the criteria that I understand you are using to evaluate this application.

The optimum use of marine resources:

The federal government has committed to removing open-pen fish farms in British Columbia by 2025. The previous Minister of Fisheries and Oceans, Joyce Murray, exercised her authority to protect wild salmon and refused to reissue licences for Discovery Islands fish farms. Ecojustice states that the Minister is well within her right not to put private profits above the public interest.

There are also fish farm bans on the west coast of the USA and we need to take similar precautions in Nova Scotia. We should not be considering the expansion or extension of existing licences. There is incontrovertible evidence of the risk to our marine resources caused by open net fish farms.

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

The Region of Queens County opposes the expansion of this industry. The concern of this duly elected Council cannot be ignored as it is the key governing body responsible for ongoing community and economic development in the county. No major investments will result from this application and indeed it is quite possible that considerable expenses will entail should a company owning a fish farm decide at some point to pack up, leaving us with a damaged seabed and cleanup costs.

TIANS (Tourism Industry of Nova Scotia) issued a statement against this form of fish farm in the province and advocates that the government prioritize and support land based developments only. They are concerned about the \$2.61 billion dollar tourism industry and the negative impact that open net fish farms have on the jobs of 40,000 workers.

Kelly Cove Limited, which is part of New Brunswick based Cooke Aquaculture, has been given approval to proceed with a land-based facility in New Brunswick. This \$72 million project will certainly benefit the economy of New Brunswick. Joel Richardson, a Vice President at Cooke, has been quoted as saying "Hybrid systems, involving a mix of

land and marine- based fish farming will continue to be part of our future.” Unfortunately the desired land based systems of the future and the related investments do not form part of this application. We should not accept the outdated net farms in our waters.

Fishery activities in the public waters surrounding the proposed aquacultural operation:

There is an important local lobster industry which is threatened by the intense concentration of fecal matter from these farms. [REDACTED] of Dalhousie University has been quoted as saying she was very surprised at “how sensitive lobsters are to the particulate and dissolved organic and inorganic waste that result from fish feces and uneaten food. These chemicals can disrupt critical lobster behavior like feeding, spawning, and mating.”

Lobstering sustains many of our small coastal communities and the loss of lobster grounds would be devastating.

Commercial fishing and recreational sport fishing also take place in the area.

The oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation:

It is apparent from any chart that this area is wide open to the Atlantic Ocean. It is very vulnerable to storms and these are predicted to become much fiercer in the future due to climate change. Fish farms get damaged and escaped fish spread lice and disease and mate with wild fish.

The old Bowater Mersey plant located nearby in Brooklyn would make an ideal spot to locate large tanks for land based farming. There is easy access to highways and it is on a deep harbour, a much safer alternative.

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

A marina attracting recreational boaters is located in Brooklyn and at Beach Meadows there is a municipal beach, a focal point of the community. These attract local residents and tourists alike. Many people have moved here from other parts of the country and elsewhere in search of harmony with nature and the pristine shores that we currently enjoy. This, we do not want to lose.

The public right of navigation:

The area in question is in close proximity to the port of Liverpool and there is bound to be a limiting factor on marine navigation. This should not be allowed when the only benefit will be the profit gained by an out-of-province multinational corporation.

The sustainability of wild salmon:

[REDACTED], a respected marine biologist, is quoted as saying “All these scientists see the same thing as I do. When you have salmon farms, you get sea lice on juvenile wild salmon. There's also infection with the viruses and the bacteria that are flourishing in these farms,” Farmed fish often escape and diseases are spread to wild salmon, jeopardizing the sustainability of the wild salmon.

It was approximately thirty years ago that the cod fishery moratorium was enacted and we are still suffering the consequences of having ignored those early warnings. Have we learned nothing from that failure to protect our ecology!

The number and productivity of other aquacultural sites in the public waters surrounding the proposed aquacultural operation:

From my perspective the existing site is not productive and should not be extended. This open net fish farm operation produces corporate revenues but has no noticeable positive impact on the economy, tourism, or employment in the region. The company has no involvement in supporting or understanding local initiatives and to the best of my knowledge all products are shipped out of the area for processing.

Summary:

My understanding is that as a Review Board you have the authority to create rules and policies in order to effectively adjudicate this application. I trust that you investigate independently the background of any companies applying. From what I have read, Cooke Aquaculture, the parent company of Kelly Cove Salmon, is not unfamiliar with the courts and their reputation is not one that I would be proud of.

There is mounting global concern about the current state of the environment and we cannot afford to take any unwarranted risks. The opposition to this application by so many members of the community and elected officials should be respected.

I request that these three applications each be denied.

Yours respectfully,

Donald Allan [REDACTED]

[REDACTED]

[REDACTED]

Port Medway,
Queens County,
Nova Scotia

Sincerely,

On Behalf of,

Alexander Ross

[REDACTED]

Hamilton, Ontario

[REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:42 am, Feb 01, 2024

NSARB-2023-001-WRT-027



Harbour Port Association

PO Box 1792, Digby, NS B0V 1A0
PH: (902) 245-1867 FAX: (902) 245-2194
info@PortOfDigby.ca

Chair of the Board
Nova Scotia Aquaculture Review Board
60 Research Drive, Bible Hill
NS B6L 2R2
aquaculture.board@novascotia.ca

January 31, 2024

Re: Support for 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 Honourable Kent Smith:

Kelly Cove Salmon has been a client of the Digby Harbour Port Association (DHPA) for 15 years. We have had a long relationship of cooperatively planning for the operation of the Port of Digby with particular emphasis on safety and efficiencies. Kelly Cove Salmon has been exemplary in their approach to Occupational Health and Safety, operations and logistics, and animal husbandry. Kelly Cove Salmon is a major client of local ship builders, and marine repair and maintenance operations. The aquaculture fishery supply chain for goods and services is deeply engaged with the success of Kelly Cove Salmon. Kelly Cove Salmon is a major contributor to employment and the regional economy. Employment throughout our region has benefited from stable jobs with health and retirement benefits.

Aquaculture operations utilizing at sea finishing of salmon smolt is an exemplary optimization of marine resources. High quality seafood production on a relatively small 'footprint' enables efficiencies in operations and monitoring for all stakeholders.


The Digby Harbour Port Association supports and encourages boundary amendment and additional licenses being applied for by Kelly Cove Salmon.

Sincerely,

A large black rectangular redaction box covering the signature of Edwin D. Chisholm.

Edwin D. Chisholm

CEO Digby Harbour Port Association

, Smiths Cove, NS

Gordon Miller
[REDACTED] NS [REDACTED]**RECEIVED**

By Nova Scotia Aquaculture Review Board at 2:15 pm, Feb 04, 2024

February 01, 2024

Nova Scotia Aquaculture Review Board
60 Research Dr.
Bible Hill, NS B6L 2R2

RE: The application by Kelly Cove Salmon Ltd. for a boundary amendment of AQ#1205x and 2 new site locations: AQ#1432 and AQ#1433, for Marine Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon in Liverpool Bay, Queens County.

As a long-time resident of Port Medway, I have to say I am opposed to open pen finfish farming in general. This practice is unethical and dangerous. The following will outline a few of the overall effects and devastating impacts that will show why this method of farming is not sustainable and is not in any way, the best use of our marine resources (Factor 1).

Net pens are considered a high impact aquaculture method as they permit the farm water and marine water to blend, dissipating into the surrounding area unfiltered. The faeces, excess feed (often medicated), various chemicals, disease and other compounds are able to pass freely into the shared environment, without any sense of obligation or responsibility from the owners to clean or remove the mass that accumulates, or restore any damage to its pre-farmed condition.

Environmental consequences

Open net finfish farming contributes to organic pollution like fish excrements and excess feed. They are also a contributor to inorganic pollution. The inorganic nutrients such as nitrogen and phosphorus, and nitrogenous waste (ammonia) that is released into the environment contributes to nutrient loading. This decreases the amount of oxygen that is required for the growth of algae which many marine organisms rely on. (Strain, 2005). This has a significant impact on the functioning and structure of the delicately balanced ecosystem and harms wild marine organisms in the process. (Factor 3, and 7)

Chemical pollution

Where to start? Among the approved chemicals for Canadian Aquaculture are:

Pest Control Products: These include drugs applied in feed as well as pesticides applied using bath treatment. These pest control, anti-lice medications and treatments, of which there are many, affect the health of non-target organisms, the biodiversity and the ecological structure (Burridge, 2003; Watershed Watch Salmon Society, 2011).

Antibiotics: The uneaten feed accumulates beneath the pens on the sea bottom. Here it can be eaten by other marine life as it is not contained. This contributes to antimicrobial resistance. In 2015, the World Health Organization (WHO) declared antimicrobial resistance one of the biggest threats to global human health today and the overuse of antimicrobials in both health care and agriculture are contributing to this global epidemic.

Industrial chemicals: Open-net farms are often enclosed in steel cages with nylon nets. When unwanted organisms such as algae, barnacles or mussels grow on or attach to the underwater nets, this is referred to as fouling. To extend the life of the nets, copper based antifouling paint is commonly used to prevent

this from happening. These paints are considered highly toxic to bivalves such as mussels and oysters and may potentially be harmful to fish species as well. (Cripps & Kumar, 2003 as cited in WWF, n.d.)

And finally, as the owner of a small sailboat, I further object as the expansion and additional pens as they will limit, if not deter, the clear passage and obstruct the access to Liverpool Bay (Factor 6).

I'm not against the concept of fish farms. Moreover, research shows that land-based closed-contained systems are far superior when it comes to sustainability. Ethically, environmentally and for the betterment of health for salmon and the people who eat them, it is THE method of choice. The closed systems reduce chemical pollution into the marine environment, remove the threat to wild salmon, remove the risk to other marine life, don't endanger the ecosystem, and allow owners to control conditions for optimal growth and profit without jeopardizing other fishing industries (Factor 3).

It is for all the reasons above that I oppose this application and ask that the Aquaculture Review Board deny the boundary amendment and application for additional pens.

Thank you so much for your consideration,



Gordon Miller

CC: Premier of Nova Scotia
Minister of Fisheries & Aquaculture
Minister of Fisheries & Oceans
Minister of Environment
Minister of Health & Wellness
Minister of Tourism
MP South Shore-St. Margaret's
MLA Queens/Minister of Public Wks
Prime Minister of Canada

PREMIER@novascotia.ca
MINDFA@novascotia.ca
DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca
Minister.Environment@novascotia.ca
Health.Minister@novascotia.ca
LEGMinister@novascotia.ca
rick.perkins@parl.gc.ca
Kim.maslandmla@gmail.com
justin.trudeau@parl.gc.ca

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By Nova Scotia Aquaculture Review Board at 2:19 pm, Feb 04, 2024

TO: The Nova Scotia Aquaculture Review Board
FROM: Peter Bowers of Port Medway, NS
DATE: Feb 02, 2024
RE: Application by Kelly Cove Salmon (KCS) for boundary amendment & 2 new licenses and leases

CC: PREMIER@novascotia.ca
MINDFA@novascotia.ca
Kim.maslandmla@gmail.com
Rick.perkins@parl.gc.ca
Minister.environment@novascotia.ca
DFO.Minister-ministre.MPO@dfo-mpo.gc.ca
Justin.trudeau@parl.gc.ca

I'd like to say I'm shocked that the Review Board would even entertain the idea of approving this application. Sadly, I am not. This application should be denied. The idea that we, the people, have to list the reasons is ludicrous. The evidence is in the research and readily available for the public, including officials and people with the authority to make change, to see. It's not even that hard to find.

I live on the South Shore in Queens County. Although I do not make a living on the ocean (I know many that do), I do like to eat from it, enjoy sport fishing and canoe the rivers and lakes. (Factors 1, 3, and 5)

Why should we open our doors and waters to an outdated practice of fish farming, when the whole world has already closed or is trying to close theirs? Land-based closed containment pens are the way to go. Put them on land where they can be controlled. Where conditions will not require antibiotics and pesticides that will contaminate the environment thereby affecting mussels, oysters, lobsters, eelgrass, Irish moss, and so on. When land-based farming is done properly, the feed can be regulated appropriately so there is no excess, and the feces that is collected can be used as fertilizer as it will not contain toxins. Also, there would be no 'leakage/escapes' of farmed fish to impact wild stock (Factors 1 through 8).

It is very difficult to be a part of a review process when the body that governs the terms gets to decide who can speak up, who can complain, who can have a voice, whose opinions matters, what facts to include or exclude. We all know that open pen fish farms have a negative impact. I do hope that my concerns are considered. Don't bite the hand that feeds us. The ocean and environment needs protecting; for me, my children, my grandchildren, and so on down the line.

This application needs to be denied.

Thank you,



Peter Bowers

Marie Camilla Smyth

[REDACTED]
Moose Harbour, Queens County
[REDACTED]

Feb 2, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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 this letter in opposition to the captioned application. I am a resident of and property owner in Queens County at the above address and have been so for approximate 13 years, prior to which I lived on Sand Beach Road in Western Head just several kilometers away for approximately 8 years.

I am a homeowner who has a direct economic, legal and personal interest in the application and its denial. I am dedicated to the area. I enjoy the scenery and very much appreciate my neighbours and the neighbourhood. My view presently is amazing. My family home which I built as my dream retirement home, is located approximately 300 feet across the whole of the waterfront (90 meters +/-) from the applied for lease referred to as 1433.

Most of the observations contained in this document are based largely on observations relating to the potential lease area referred to as 1433 – I live by it and observe it directly every day.

Both new leases being referred to as 1432 and 1433 should be denied, and at the absolute least, the expansion of the existing area being referred to as 1205 should be denied and at the very least the lease holder should be forced to reduce the usage to

that which was originally granted. Throughout this document, KCS is used to inclusively mean Kelly Cove Salmon Ltd., and its parent and related companies, as applicable.

To specifically address how this relates to the factors as listed in Section 3 of the Aquaculture Licence and Lease Regulations which are (the subheadings below as bolded and underlined):

- a) **the optimum use of marine resources** – I find it difficult to understand how restricting the area to single use open net pen cages can be considered as optimal use, when there are so many other existing uses as detailed below. For example, the area 1433 is currently used by commercial lobster fishermen, indigenous lobster fishermen, sports fishermen, Irish sea moss harvesters, surfers, and supports seals and numerous bird species, some considered species at risk. What could be considered more optimal than what the area is presently used for.

Also, the report “*Final Report of the Independent Aquaculture Regulatory Review for Nova Scotia*”, which embodies recommendations from *The Doelle-Lahey Panel* states “We recognize that fin-fish operations, even if well regulated and operated, are not appropriate in all coastal waters around Nova Scotia”. The report recommends a classification system following an evaluation of sites. I think there should be a moratorium on expanding and adding more sites until it is determined by a presumably independent body as to the suitability of Liverpool Bay.

- b) **the contribution of the proposed operation to community and Provincial economic development** – Kelly Cove Salmon Ltd (KCS) have not provided a comprehensive answer as to local benefits – in fact they have skirted around the issue. They do say in their application that they are “buying tens of millions of dollars worth of goods and services each year from hundreds of local small and medium businesses”. They conveniently have not offered any proof. They have not said how many actual full-time employees actually live in Liverpool and in Queens County. Just look to what they said and what they did in Shelburne.

Kelly Cove and the Cooke Group are not good corporate citizens. They seem to flagrantly abuse their rights in areas they operate. They have been able to exceed their lease boundaries in the Digby area, as well as the Coffin Island site. They claim the site 1205 already exceeded the approved boundaries when they purchase the lease. A good corporate citizen would have reduced the cages to comply until proper approval was obtained. They have been heavily fined in Maine and Washington State. In Washington State they have been closed down by the government of that state for their history of failing to comply with multiple provisions outlined in contracts and significant under reporting.

Extract from WBA Report

“The World Benchmark Alliance (WBA) reports Cooke Aquaculture ranks 27th out of 30 global seafood companies. The Index measures how the world's leading seafood companies contribute to the sustainable management of our oceans and coastal ecosystems. Despite people around the world relying on the seafood industry for employment, sustenance and wellbeing, large companies are failing to provide sustainable and equitable food systems that also protect and restore oceans.”

The report goes on to say *"The company (Cooke) should significantly improve its reporting in all four measurement areas, particularly in the governance and strategy area. In addition, the company lags behind its peers in the areas of social responsibility and traceability. In the traceability area, Cooke can commit to ensuring traceability in its seafood products and should disclose the sources of its seafood products and marine feed ingredients. Furthermore, in the ecosystem measurement area, the company has an opportunity to enhance transparency regarding how it tackles critical concerns in aquaculture."*

KCS was fined \$500,000 for illegal use of pesticides in the Bay of Fundy, \$332,000 penalty for pen collapse in Puget Sound, \$2.75million over a net pen collapse, US \$156,213 for “a number of incidents at its net pen sites in Hancock and Washington counties, including having too many fish in pens, failing to conduct environmental sampling, and failing to follow a number of procedural measures laid out in the company’s operating permit, including on-time filing of pollution sampling reports and fish spill prevention plans”, etc.

The Nova Scotia Department of Fisheries and Aquaculture Regulatory Review: Final Report and Recommendations, March 15, 2023 makes the comment “Operator compliance history is viewed as a material decision-making factor that should have clear consideration..... There is no evidence this has been done. I am sure if it had been done, there would be no question their application would be declined.

- c) **fishery activities in the public waters surrounding the proposed aquacultural operation;** There are year-round Aboriginal lobster fisheries in the proposed 1433 area, there are active commercial lobster fisheries during the season from November to May. There is seasonal commercial and sport herring and mackerel fishing, general sport fishing and Irish sea moss gathering.

- d) **the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation;** these characteristics are described in the application – although it would appear the characteristics in general were all prepared by the KCSL group, so not independent.

We are concerned about the depth of the locations. The depths of the cages are uniformly 9 meters including the predator net in all three locations. The average depth of the sites according to the Notice of Works filed under the Navigation Protection Act (Canada) forms are: Mersey Point 7 to 20 meters, Brooklyn 6 to 20 meters, and Coffin island 8 to 20 meters. This indicates that the depths under the cages ranges from – 3 meters to + 11 meters. Does this not indicate a significant flushing issue?

I have viewed the shoreline in the harbour area of Coffin Island. There is definite buildup of sludge like material precluding swimming and small boating activities. Storm activities results in foamy sludge on our shoreline in the 1433 area, sometimes blowing the same right onto our house. That could become a massive issue with the pens so close to our property. That would likely result in staining of our sidings and smell.

There have been days in some winters where there has been floating ice lasting two or three days extending 40 to 60 meters into the bay. How will this build-up of ice affect the pens, and has this been considered?

There are species at risk in the area. The Nova Scotia Species at Risk report lists 11 birds in Nova Scotia as being species at risk. This includes the Piping Plover. Beach Meadows beach is shown as a core habitat for nesting. Also, Harlequin ducks inhabit the area. There is an abundance of wild birds, including hawks and two nesting pairs of Bald eagles which have moved into the area on either side of our property.

KCS states “their employees will not kill, harm or collect adults, young or eggs of the piping plover and will not interfere with, kill or harm any Harlequin ducks observed near the site. They also undertake to limit the speed of their boats to 9 knots and will stay at least 500 meters away from the Plover site.

One chart shows the proposed expanded site (1205) to be 270 meters from Beach Meadows, and within 250 meters of Coffin Island which is a Provincial Nature Reserve. A strange undertaking, unless KCS sees this as a potential risk. Apart from the fact that we cannot afford such risks, who will monitor and pay for the monitoring of KCS? The report also omits the 154-acre nature reserve managed by the Nova Scotia Nature Trust which falls within a 5 km radius of both 1432 and 1433 sites and located from Western Head to White Point.

The Mersey River and the Medway River are the closest rivers to the contemplated sites. The **DFO Maritimes Region Science Review of the Proposed Marine Finfish Aquaculture Boundary Amendments and New Sites, Liverpool Bay, Queens County, Nova Scotia dated Sept 2022** says “Salmon were not detected in the Mersey River during the survey, and the population is considered extirpated. Increases in escapees may hinder future any recovery efforts in the Mersey and other SU (Nova Scotia Sothern Upland) Rivers.” The report goes on to say, “the risk to the wild Salmon (which are biologically unique) will be greater with the proposed increases in the number of farmed Salmon within Liverpool Bay”.

All of the coast-lines adjacent to the proposed sites are shown as areas of significant species and habitats in the ***Species at Risk Report*** see page 184 of volume 1 in the application.

The Municipality of Queens has recently made a substantial investment in upgrading and adding new facilities at Beach Meadows Beach. Increasing the size of 1205 will have adverse affects on this beach and have a negative effect on tourism.

I am both mobility challenged, and seeing the new facilities added to Beach Meadow beach and the matting which allows easier access to the sand beach have been very encouraging. Expansion of the cages, particularly in this area, only serve to discourage using this area as detailed elsewhere.

It is beyond our capability to adequately address the scientific oceanographic and biophysical characteristics covered in the application other than what is mentioned here.

- e) **the other users of the public waters surrounding the proposed aquacultural operation;** other users are aboriginal fishers, sport fishers, commercial fishers, Irish sea moss fishers, recreational sail and power boaters, kayakers, surfers, and visiting Coast Guard and Naval ships. (at time of writing, a large Mersey Seafood ship is passing by and in fact right through the proposed 1433 area.)
- f) **the public right of navigation;** Chanel marker buoys are located within Liverpool Bay and maintained by the Canadian Coast Guard. The placement of 1432 and 1433 will significantly narrow the channel through to Liverpool and Brooklyn. It will also make sailing much more difficult as they tack constantly across the bay, both in exiting and entering from Brooklyn Marina. The restricted access will also directly affect both Lobster and Commercial fishermen with significant danger in stormy and foggy weather.

Both channel marker buoys, the one off of the entrance to Moose Harbour and the one off of Brooklyn have had to be repositioned following storms in recent years.

- g) **the sustainability of wild salmon**; establishing open pen net fish operations does not contribute to the sustainability of wild salmon. In fact, just the opposite – containment issues have occurred with the existing operation (1205) which can only endanger existing stocks, and with the expansion there becomes greater opportunities for escape. Also there appears to be proof that concentration in cages increases disease which cannot be contained.
- h) **The number and productivity of other aquaculture sites in the public waters surrounding the proposed aquacultural operation**; there are no other water-based sites surrounding the proposed expansion and new additions.

I relocated from British Columbia in 2003 to Liverpool, in part because of the beauty of Liverpool Bay – this was after visiting approximately 30 properties along the north shore of New Brunswick, all around PEI and from about Sherbrooke NS to Lunenburg. I was encouraged to come a little further down the coast, and decided I need not go any further once I saw Liverpool.

There are many, many examples of energetic positive influencers who have moved here and contribute to the wellbeing of the community, myself included. I would hate to see this trend change, both for potential newcomers and existing residents who may search out other attractive areas away from Liverpool and indeed Nova Scotia. I am currently aware of three families in my area who are considering moving if this goes ahead.

Other factors/comments – (the following are comments and/or quotes [NSARB 2023-001 Application Package Volume 1](#)

Esthetics 5.3.2.2 - comments below are quotes from the application. “to ensure the operation is as esthetically appealing as possible” – not sure how you do that – the pens on the existing farm stick out like a sore thumb when they are viewed from our property and some 2,000 meters away - can you imagine what it will look like when they are only 300 meters away? (the location of site 1433)

The last time I checked, there is an area located in or near their Shelburne location which has become a dumping ground for old, broken, or otherwise unusable gear – it is a real eyesore.

5.4.2 – “responsible operation ...included consideration of neighbours in terms of noise (and should include light pollution)...KCS utilizes mufflers or noise reduction methods/materials on air blowers and diesel engines as well, minimizes activities that can create noise. Apart from the feed barge, I can hear the service boat (s) quite clearly in their transit to the 1205 site – certainly not noise reduced. “It is KCS policy to turn off non-essential equipment, whenever possible, to reduce noise and visual effects.” This is a basic admission that there will be noise, and they certainly will need navigation lighting.

Storm – 1433 bad location Both sites 1432 and 1433 in particular are in exposed areas where VERY rough surf and large waves occur when there are storms in the area. Northeasterly winds result in large breakers crashing on the shore which we can feel in the house. Even the Surfers quit in this area due to the size of the dangerous waves. Fishing boats tied up in Moose Harbour, the entrance to which is located East of the 1433 pen boundary, do not enter or exit the harbour during these storms.

The existing cages in 1205, which is significantly more protected being somewhat hidden by Coffins Island, have been broken up or apart by storms, resulting the in the release or kill of the penned salmon. When the existing pens broke apart years ago, pieces of it landed on the shoreline located adjacent to the Western Head Lighthouse where they remained for months. At least 10,000 dead salmon hauled from the Coffins Island site in March 2019 due to suspected cold temperature issues.

I recently hired a man to pick up 12 broken wire lobster traps from our shoreline and to bring them to the dump. These are heavy, and this only serves to illustrate the power of the waves in the storms we experience as well as the shallowness of the waters in this area.

Here is an example of wave activity at Moose Harbour adjacent to site 1433



Difficult for access to Irish Sea Moss fishers - the location of 1433 would make access to the shoreline difficult to Irish sea moss fishers, assuming the moss still grows.

Harvesting seems to be decreasing and this is possibly due to the pollution from the fish farm.

Eliminate access to surfers - the location of 1433 would preclude surfing, as there would not be sufficient distance from the boundary of the pen to the shoreline to allow for safe rides. Also, and this of course has not been tested, presumably the pens would dampen the wave action, reducing “good surfing”.

Water Depth and Location factors. I am very familiar with some of the farms located in the Broughtons and the Discovery Islands areas of British Columbia, having spent years cruising the area in my boat, and of some farms in Chile. All pens I have seen in these areas were located in very deep water, and none were in populated areas. All three pen areas will be viewable from our full-time residential property, will certainly be unsightly, and will cause both light and sound pollution. The feeder barge, which is presently located approximately 2.5 km away from my property, can be heard sometimes depending upon the wind direction. There was a spotlight on that barge which actually lit up my master bedroom making sleeping difficult, but it was either turned off or redirected following several requests to do so.

KCS is obviously aware of these issues, as they make comments of these issues in their application.

Eelgrass There has not been a lot of significant study of this important marine vegetation in Nova Scotia, but the report Managing Aquaculture and eelgrass interactions in Nova Scotia found that “eelgrass cover exhibited a generally declining trend with increasing proximity to the fish farm” in Port Mouton Bay, that the eelgrass cover was statistically lower in Port Mouton Bay.

“Seagrasses are often described as “ecosystem engineers” for their ability to modify their physical, chemical, and biological environment. For example, as water currents and waves pass over seagrass meadows, some of their energy becomes dissipated. This reduction in water velocity can protect shorelines from coastal erosion and encourages sediment particles suspended in the water to settle on the seafloor”.

Eelgrass is an important habitat for lobster.

In summary, the expansion in general, and more specifically the introduction of site 1433 will affect me and my family:

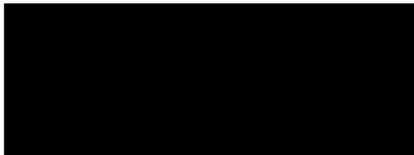
- 1) Economically through the reduction in the resale value of our property which will invariably decrease the amount we can sell the property for.

2) Socially as I will no longer enjoy the peace and quiet I have now because of noise and lighting, because I will no longer enjoy the almost unimpeded beautiful view and because of the smell and accumulated debris that will collect on our shore line. (Almost – because we can see the existing farm)

I presently enjoy seeing the eagles, the gulls, the seals and the lobster fishing in particular. All of this will disappear.

Thank you for your attention and your consideration.

Yours most sincerely

A solid black rectangular box used to redact the signature of the sender.

Camilla Smyth

RECEIVED

By Nova Scotia Aquaculture Review Board at 2:36 pm, Feb 04, 2024

February 3, 2024

Stew & Cheryl Horton

[REDACTED]

Liverpool, NS

[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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.

It is our strong desire that the application noted above be rejected.

We jointly own three properties which will be directly affected by the decision of the Nova Scotia Aquaculture Review Board, namely [REDACTED], along with [REDACTED] and [REDACTED] NS, [REDACTED].

It is our firm belief that the approval of these licenses and leases provides extremely limited benefit to community and provincial economic development at the cost of significant negative impact on the tourism and fishing industries currently thriving in this area along with potentially substantial negative impacts on the environment.

Our three properties are all oceanfront, adjacent to the new sites proposed in Liverpool Bay. One of these properties is a multi-unit short term rental facility newly completed which positively contributes to the local economy with direct employment, tax dollars and the attraction of guests to our area. The two proposed sites will have a dramatic negative effect on the desirability of our villa's sightlines across the bay.

Having lived on the waterfront in Liverpool for 15 years now we have experienced numerous storms and hurricanes which have been progressively getting stronger with the effects of climate change. We simply cannot understand how the two new proposed sites can withstand the 25-to-30-foot waves which are now commonplace, especially in their exposed location with no protection whatsoever like that provided by Coffin Island to the existing site.

A failure of the proposed site's cages would be catastrophic to all of Liverpool.

A careful and objective review of these and other considerations re this matter must conclude that the rejection of this application is the only reasonable outcome.

Regards,

Stew & Cheryl Horton

RECEIVED

By Nova Scotia Aquaculture Review Board at 2:40 pm, Feb 04, 2024

From: [Beth Guptill](#)
To: [Aquaculture Review Board](#)
Cc: [Premier](#); [Minister DFA](#); [Kim.maslandmla@gmail.ca](#); [Minister. Env](#); [Health and Wellness Minister](#); [office@liberal.ns.ca](#); [leader@greenpartyns.ca](#); [rick.perkins@parl.qc.ca](#); [justin.trudeau@parl.qc.ca](#); [DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca](#); [ministre-minister@ec.gc.ca](#); [ministerofred-ministreduder@ised-isde.gc.ca](#)
Subject: Submission to ARB re Kelly Cove Salmon Ltd.
Date: February 3, 2024 4:40:55 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

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

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

This submission to the Nova Scotia Aquaculture Review Board is in opposition to the application of Kelly Cove Salmon Ltd. for a boundary amendment and two new marine finish aquaculture licences and leases for cultivation of Atlantic Salmon in Liverpool Bay, Queen's County.

The factors of the Aquaculture Licence and Lease Regulations to be addressed include

1. The optimum use of marine resources
2. The contribution of the proposed operation to community and provincial economic development
3. Fisheries activities in the public waters surrounding the proposed aquaculture operation
4. Oceanographic and biophysical characteristics of the public waters
5. The other users of the public waters surrounding the proposed aquaculture operation
7. The sustainability of wild salmon

Pesticides and antibiotics used to treat sea lice and diseases of salmon in open-net pen farms collect on the sea floor along with mounds of fish waste creating a toxic environment for lobsters and their marine habitat.

Within a few years of the current Coffin Island farm being set up the seabed below was dead. An eleven year study done by Inka Milewski, a Dalhousie biologist, in local waters, showed open-net pen salmon farming decreased lobster catch by 42% and egg bearing lobster catch by 56%.

The ideal location of open-net fish farms is in deep waters where it is hoped that waste from farms would be washed away. But Liverpool Bay does not have deep waters and no cleansing tidal effect occurs so waste does not move out to sea.

Residents report that the shoreline of Coffin Island is littered with industrial trash which Kelly Cove takes no responsibility for. In 2019 World Animal Protection ranked Cooke Aquaculture- who owns Kelly Cove Salmon Ltd. - at the bottom tier of similar companies in the amount of debris they leave in the ocean.

The pollution of waters and shorelines directly impacts local property owners, recreational boaters, and the tourism and lobster industries.

There are many concerns about Cooke Aquaculture including its banishment from Washington State after huge numbers of escaped salmon due to inadequate maintenance of cages. The previous history of a company and its standards I believe are very important indicators of what to expect in the future and in my opinion are very important in this decision.

Studies have shown that wild salmon are endangered by the diseases and sea lice that breed in open-net pen salmon farms. Young salmon leaving rivers for the Atlantic ocean and mature adults returning to spawn in these same rivers become vulnerable to disease and sea lice infestation when they migrate near these farms. Young salmon can die if only two sea lice adhere to their bodies.

In BC the devastating impact salmon farms had on wild stocks lead to the shut down of 15 open-net farms near the Discovery Islands to protect the dwindling wild population of salmon in the Fraser River.

Nova Scotia wild salmon population is also at risk from the regular escapes of farmed salmon into ocean waters resulting in interbreeding between wild and farmed fish. A study in Newfoundland found that the resulting hybrid offspring are less able to survive in the wild, ultimately decreasing the total wild population and leading to genetically weaker stocks.

It is no secret that wild Atlantic salmon numbers are alarmingly low in Nova Scotia . They need our support and protection , not infestation and interbreeding .

Elizabeth Gupstill MD

[REDACTED]

Lower Branch, Lunenburg County

[REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 2:45 pm, Feb 04, 2024

[REDACTED]
[REDACTED]
Shelburne, NS [REDACTED]
[REDACTED]

To whom this may concern:

Cooks/Kelly Cove Salmon plans to expand two other fish farms in addition to their existing farms that are already operating in Shelburne County is a very positive move for our community and to the province as a whole.

The fact that the world's largest private seafood company sees potential in our community and willing to invest in our area is paramount and great boost to our economy. They offer good paying jobs with great medical benefits and retirement packages. This action insures that they are serious with their plans to expand and are keen to employ a great workforce to manage and operate their business.

When we operated two motels in Shelburne (five years ago) we saw first hand the positive impact, Cooks/ Kelly Cove Salmon had on our accommodation business. Many nights were filled with harvesters, inspectors and employees that needed to stay in this area. While we appreciated this business all the time it was a welcome relief in the shoulder season. We now operate a restaurant in Shelburne and see the same benefit to our food establishment, this is not exclusive to just our restaurant but all restaurants in the area.

In addition to accommodation and restaurant sectors Marine repairs is another sector that benefits from Cooks presence in our community. Marine repairs to equipment and vessels that presently operate the farms are finalized here and occasionally vessels from other sites come here to have repairs done.

Tourism is very alive in Shelburne. In areas such as ours, where sustainable aquaculture is practiced, this is attraction among the tourist industry. With all the buzz around healthier

protein based diets, tourist expect and welcome the opportunity to purchase and consume great seafood.

We have confidence that Cooks Aquaculture with their research and development department will continue to grow healthy and sustainable fish products , while boosting the economy in our community and in fact the entire province.

James and Sandra Goodick

[REDACTED]

Shelburne NS, [REDACTED]

[REDACTED]

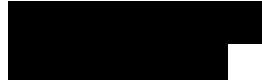
(James)

[REDACTED]

(Sandra)



Brazil Roc 33/34 Lobster Assoc.



Tusket, NS



February 3, 2024

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

Dear Chair and Board:

The **Brazil Rock 3334 Lobster Association** wishes to make The Nova Scotia Aquaculture Review Board aware of our displeasure and opposition to 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.

Our comments are related to Section 3 – Factor3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

The Brazil Rock 33/34 Lobster Association has 715 members, many of these members fish lobsters in and around the proposed areas.

The affects of a lease being granted at the location has the potential to negatively impact Lobster Fishing Area 33.

The “Fishery Decision-Making Framework Incorporating the Precautionary Approach” has been utilized for species in Canada; that is, stocks, such as lobster and the feed that they rely upon, that are the specific and intended targets of commercial uses.

It is necessary and warranted that the Precautionary Approach be applied to Kelly Cove Salmon Limited's request for access to an increase and a new area.

No increased access should be considered until a thorough and complete stock assessment of lobsters within LFA 33 has been completed and peer reviewed.

The stock assessment should determine if the LFA 33 fishery could be jeopardized by a boundary amendment and two new Marine FinFish Aquaculture licenses and leases for the cultivation of Atlantic Salmon in Liverpool Bay within the proposed site, at what time of year does the biomass reproduce, molt and the overall health of the stock.

The precautionary approach in fisheries management is about being cautious when scientific knowledge is uncertain, and not using the absence of adequate scientific information as a reason to act or failure to take action to avoid serious harm to fish stocks or their ecosystem. This approach is widely accepted as an essential part of sustainable fisheries management.

We do not feel there has been enough study of the effects of finfish aquaculture on the entire life cycle of lobster from egg, to larvae to adult. They are very vulnerable as larvae floating on the surface. And, we know the chemicals used for sea lice also kill lobster.

Furthermore, no reasons, other than economic gain for the corporation has been revealed for an increase in their lease area, yet this large increase in pens poses economic challenges for LFA 33.

The proposed application for AQ#1205x, AQ#1432, AQ#1433 in Liverpool Bay, Queens County pursuant to the Fisheries and Coastal Resources Act, poses detrimental financial impacts upon LFA 33 harvesters and the area where they harvest their lobsters.

The Brazil Rock 3334 Lobster Association is concerned that a thorough stock analysis with conservation at the forefront has not been conducted nor peer reviewed.

The Brazil Rock 3334 Lobster Association does not concur with a proposed application for AQ#1205x, AQ#1432, AQ#1433 in Liverpool Bay, Queens County pursuant to the Fisheries and Coastal Resources Act.

Sincerely,

A black rectangular box redacting the signature of the Board of Directors.

Board of Directors
Brazil Rock 3334 Lobster Association

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:04 pm, Feb 04, 2024

Johnston**Hunts Point, Nova Scotia**

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

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 object to the above application by Kelly Cove Salmon Ltd, (hereafter KCSL) on the following grounds:

- 1) The area in question is now being used by local commercial fishermen, indigenous fishermen, sports fishermen, lobster fishermen, sea mossers, surfers, plus many forms of fauna. An extension will impede these activities, most of which affect income.
- 2) There are only broad claims as to the economic benefit that would be provided to the area. No specifics are given such as how many full time employees, from where, which local, meaning Queens County, businesses would benefit etc.
- 3) KCSL have been fined and shut down in other jurisdictions, eg Maine, BC, Washington state and are ranked 27/30 by World Benchmark Alliance. Why would we want such a company here???
- 4) There are reports easily verified by visual inspection by anyone of increased sludge from the current farm. Beach Meadows has recently undergone extensive work including accessibility options, showers, more parking to enable more local residents to enjoy the beautiful beach there. The sludge will make it unusable.
- 5) Public navigation will be difficult through the channel. Already there needs to be good visibility to avoid buoys and lines from the current farm. This would make increased difficulties for commercial fishermen as well as recreational boaters and sailors.
- 6) Esthetics will be unattractive, and this matters in that tourism will decrease if the view is further encumbered.

- 7) Storm activity is especially enhanced in that area. Below is photo of not the worst storm wave action in Moose Harbour, adjacent to proposed site. Storms are becoming more frequent and stronger.



- 8) The entire ecosystem of seagrasses, which in turn support fish life, help prevent erosion, decrease the effect of wave action, will be destroyed.

In summary, there is no good reason to allow this project and there are multiple reasons to reject it, which I urge you to do.

Sincerely,



C. Celeste Johnston, OC, RN, DEd, FCAHS

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:26 am, Feb 05, 2024

NSARB-2023-001-WRT-036

February 4, 2024

██████████
Brooklyn, NS ██████████

E-mail: ██████████

Mobile: ██████████

Clerk of the Board: Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

E-mail: 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 have owned property with family members in Beach Meadows for 15 years. I moved back to the area over two years ago. My spouse and I are currently building a new home on the property. We will soon be residing at ██████████ after we complete our new home build. The “fish farm” and the recent applications have been significant conversations in the community. I have not met or know anyone in the community that is in favour of the fish farm. From fishers, to boat owners, to people who are concerned about the community, they live in, to local business owners no one I have spoken to has expressed support for this application. This is the reason that I solicited opinions.

In trying to understand the current state of aquaculture globally I reviewed industry details regarding the economic impact in Nova Scotia as well as globally. On top of economic impact, I also reviewed the Aquaculture Licence and Lease Regulations from the Fisheries and Coastal Resources Act. Specifically, the factors to be considered in decisions related to marine aquaculture sites. I have paid close attention to reports of previous hearings.

I submitted my views to the Regulatory Review that took place last winter and read the final report and recommendations from March 2023. I believe it is important to inform yourself, to participate, and ensure that those in positions of decision-making take into consideration a broad set of views not just special or corporate interest. Therefore, **I am opposed to the boundary amendment and the two new licenses and leases and would like the ARB to deny these applications for the following reasons related to section 3 of Aquaculture Licence and Lease Regulations:**

- Factor 3(b) the contribution of the proposed operation to community and Provincial economic development;
 - I can see how the provincial economic development might benefit. The \$80 million industry will grow. However, the local benefit is so limited and there is a greater cost locally. Current activities will be displaced. Local fishery impacts, primarily lobster and local tourism, will be negatively impacted.

- 3(a) the optimum use of marine resources(d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation; (e) the other users of the public waters surrounding the proposed aquacultural operation; (f) the public right of navigation will all be impacted;

My opposition is based on my own use of this space. When friends visit, we always try to get out on the water and utilize this space. We will do a little mackerel fishing. The last time my chef friend from Calgary was so excited to go fishing and catch something we could cook for supper. *(3(a) Optimum use)* I don't think you can place a value on this from a promotion of Nova Scotia perspective *(3(b)Economics)* but there is an economic impact. In addition, I pay a fisherman to take us out in this area. *(3(b)Economic)* The new pens are in the space we fish. *(3(a) the optimum use) (3(d) the oceanographic and biophysical characteristics) (3(e) the other users of the public waters) (3(f) the public right of navigation))*

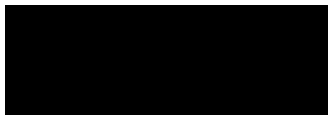
Once my new house is completed this summer my plan was to buy a boat. I completed Transport Canada's approved Boater Safety Course and received my Pleasure Craft Operator Card in preparation. If these applications are approved there is no reason to buy a boat. *(3(b)Economics)* The dollars will stay in my pocket instead of my participating in the local economy.

I want to be a recreational boater; I am not looking to go miles offshore as a novice. *(3(a) the optimum use) (3(d) the oceanographic and biophysical characteristics) (3(e) the other users of the public waters) (3(f) the public right of navigation))*.

I understand why industry would like to use the space from a cost perspective. I think the question is why do the local users, visitors, current user like fishers, recreational boaters, and others need to subsidize the industry when other viable options exist. The ability of the operator to do their business is not limited in the same way as other users of the space will be. *((3(b)Community Economics) (3(a) the optimum use) (3(d) the oceanographic and biophysical characteristics) (3(e) the other users of the public waters) (3(f) the public right of navigation))*.

I think there are so many environmental concerns, a lack of industry integrity, poor oversight and inability or unwillingness to regulate appropriately. However, I have tried to stay with my personal story and not critique this process or the industry. Again, **I am asking the ARB to deny these applications for the afore mentioned reasons.**

Regards,



Tim Nickerson
(Queens Co Resident)

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:58 am, Feb 06, 2024

From: [Heather Schellinck](#)
To: [Aquaculture Review Board](#)
Subject: proposed licenses and leases for salmon farming in Liverpool Bay
Date: February 5, 2024 3:39:58 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

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

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

February 05, 2024

[REDACTED]
Port Mouton, NS [REDACTED]

E-mail: [REDACTED]

Phone [REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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.

The addition of two new fish farms will directly impact the ocean near our beach house in Port Mouton. We are not in favour of granting the proposed licenses. While many Nova Scotians are working to maintain their properties in an environmentally sustainable manner by reducing the use of fertilizers, etc. that would impact our ocean, it seems as if granting an aquaculture license for penned salmon would lead to the opposite situation. In particular, the effluent from the fish farm, be it waste from the salmon or residue from food or from antibiotics to treat disease, will not be flushed out to sea as is suggested; rather it will empty directly into the bay area and circle back from whence it came. Previous research has demonstrated that this will be the case. While we recognize the potential economic benefit, it pales in comparison with the long-term desecration of the surrounding waters. There is some suggestion that the addition of two more fish farms could impact both the existing lobster fishery as well as the recreational use of the nearby beaches. It is time for the government to recognize that in this case the destruction of the surrounding ocean environment far outweighs any proposed benefits from the farming of salmon. Now is not the time for more fish farms; consider the consequences outlined here and from the many other submissions to the board and deny the application for aquaculture licenses and leases in Liverpool Bay.

Regards

Heather and Tony Schellinck



Port Mouton, NS

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:02 am, Feb 06, 2024

NSARB-2023-001-WRT-038

Anne Laws

[REDACTED] Beach Meadows
[REDACTED] Brooklyn
Queens County, N.S.
[REDACTED]

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

**RE: OPPOSITION TO COOKE AQUACULTURE APPLICATIONS FOR
PROPOSED EXPANSION, AQ#1205X (Coffin Island), AQ#1432 (Brooklyn),
AQ#1433 (Mersey Point)**

February 5, 2024

To the members of the Aquaculture Review Board:

I wish to make my concerns known to you regarding these applications and to express my opposition to Cooke being granted any permission to further expand their open-net pen salmon farm operation in Liverpool Bay. Here, in submitting a letter, I am speaking on my own behalf being for many, many months now, no longer a director or member of Protect Liverpool Bay. I ceased to be a member previous to PLB applying for intervener status due to personal reasons. I feel it important to clarify to the ARB that I am not under the representation of PLB so it is recognized that submitting a letter is the avenue of feedback open to me in this process.

My letter is written in a narrative style but addresses the following factors as outlined for comment: Factor 1 - the optimum use of marine resources, Factor 5 - the other users of the public waters surrounding the proposed aquaculture operation and Factor 6 - the public right to navigation.

To begin, I am a 56 year resident of Queens County, living 30 of those years in Beach Meadows and the others in Sandy Cove (Brooklyn). My husband is a 58 year resident of Queens County, with only 3 of his years not lived in the Eagle Head/Beach Meadows area but in Liverpool. Our 2 teens, 17 and 19 know Beach Meadows as home and Beach Meadows Beach as a treasured family spot. Raising 2 of the next generation of adults, having a love for children and nature (especially the water), these applications concern me greatly for the health of the waters in this area and our beach. Our environment and natural resources and beautiful areas for recreation must be used in a way that maintains

their health and usage for future generations. I am not opposed to industry and understand the need for income for our citizens and government and the role the ocean plays in this, however, I will not support industry that should be evolving to protect the environment from harm rather than continuing on with outdated practices that have been proven to destroy it. If in some way in 50 years time I could miraculously view the future generations of my family and Nova Scotians in general, I would want them to be using and enjoying the ocean for work and play, respecting it so that they, too, will leave it in a condition where those who follow them will have the same ability.

Open-net pen salmon farms are not low impact, high value aquaculture and fall into this destructive category of industry that I will not support in Liverpool Bay or for Nova Scotia. In saying that, I do believe that if our government wants a place for the farmed salmon industry here and throughout Nova Scotia, it must incentivize Cooke and others to progress to more sustainable methods. Not allowing the open-net pen harmful model but seeking ways to work with companies to transition to closed-contained, on-land salmon farms will have benefits all around: (1) the economy of the area and province where the on-land farm is located will be bolstered through local property taxes which would be much more substantial than the nominal lease fees paid presently to DFA, (2) the farm would have to manage their waste – fish waste, chemicals (antibiotics and pesticides) and feed would not be released into open ocean meaning less ocean pollution and a healthier habitat for other marine species and water users, (3) the pens and farmed fish would have less risk of being battered by storms which are increasing in frequency and strength, (4) the government of Nova Scotia and its Department of Fisheries and Aquaculture will be putting the sustainability of our ocean and wild fish first with these progressive values. This will lead to an improved reputation of DFA with Nova Scotians who will now have more confidence that their ocean resource will be protected and managed with its health foremost, (5) this reputation will also lead others to look at Nova Scotia as a trend-setter, not a province expanding an industry model that most are trying to get out of their waters. Like attracts like. Focus on making industry more sustainable and more of the same will be attracted here. Sadly, continuing to maintain the status quo with those industries that do environmental damage will have others who seek to do the same flocking here so they can use and abuse our ocean resource.

The large number of interveners to these applications representing various organizations, local municipal government, commercial fishermen both native and non-native, and many citizens including coastal property owners, must clearly show the ARB that many feel they would be negatively impacted if Cooke were granted permission to expand. I stand with their concerns valuing our coastal communities and waters, our wild caught fisheries, our wildlife in sea and on land (especially lobsters, eelgrass, endangered species i.e. wild Atlantic salmon and Piping Plovers) and our ability to enjoy Liverpool Bay for recreation activities on water, beach and shoreline. With lobster fishing the huge economic driver it is here in our local communities and in Nova Scotia, that our government seeks to expand anything that could negatively affect it has me totally baffled. Here in Liverpool Bay, taking over areas where lobster traps are set or compromising lobster nursery areas makes absolutely no sense. That lobsters because of seabed fouling can change their feeding and breeding habits, have shells that are affected

by pesticide use, can be killed by it ... why would we risk this? And more farms equals more risk! One would have to question the reasoning of wanting to expand an industry that can cause detriment to lobster in many of its stages. And why would we not try to protect the wild Atlantic salmon that we do have, numbers of which are endangered? Let's alleviate them of the harms that afflict them from open-net pen salmon farms and see what happens to their population. DFA has a mandate to protect wild fish and wild fish habitat.

It is not hard to see why those who use and care about Liverpool Bay and our precious Beach Meadow Beach have erupted with opposition. If approved, the reality of 2 more open-net pen salmon farms of 20 cages each and an addition of 6 more cages to the present site takes more room, congesting Liverpool Bay and changing its usage for other commercial and recreational users. Not only will that water taken up by the farms be unusable for any other purpose but the water in that vicinity will also be exposed to the daily operations of the salmon farms. Within Liverpool Bay there will be 46 (20+20+6) more open-net pen cages, as well as additional buoys, anchoring systems and barges owned by Cooke. The number of farmed fish will change from 400, 000 to 1.8 million. There will be more nutrients from the feed going into the water, more fish waste and a potential increase in chemicals entering the water, too, if illness, disease or a sea lice outbreak occurs. This is real life for the open-net pen salmon farm industry. We have had ISA (infectious salmon anemia) at Cooke's present site, AQ#1205. We have had mass mortality at AQ#1205. We have had destruction of pens from storms and debris on the shoreline from AQ#1205. And again, more farms means more risk of it occurring! And I use the word "we" because when these problems occur, Cooke, its farmed fish and property are not the only ones affected. The ocean water is and whatever lives in or near it is, the shoreline and coastal residents are. The water near and further away from the farms could potentially be very negatively affected for marine species including plants and animals, and also for humans during such troublesome situations. The thing is that even on good operating days for the fish farms, the dispersal of waste from all the additional fish and feed would still be happening. I myself love to swim at Beach Meadow Beach as do my teens. The water quality there, if Cooke is granted these applications, will be a major concern, whether the farms are experiencing problems or not. Ocean currents disperse ocean water and what's in it. That is why the ARB must not permit these applications.

And as we talk about valuable water space that will be taken up by these new developments if they are given the go-ahead, how are citizens of this region assured that Cooke won't continue to expand any of their farms here outside their boundaries as specified in its applications? Because that is exactly what they did at AQ#1205, their present site. For years they occupied hectares of ocean resource outside of their lease which the government had not approved. Their application for a boundary amendment was not submitted to DFA until 2019 and granted. Previous to that, though, the parts of their operation outside of their lease inhibited others from using this part of our public waters for other purposes. The ability to fish in that part of the water, recreate in it was lost during that time of unpermitted use by Cooke. Our water was exposed to more open-net pen salmon farming than it ever was permitted to be by the regulatory body. So,

although the ARB will not allow any past history of Cooke to be brought up in the hearing of these applications, it is totally relevant for citizens and groups to discuss past practice of Cooke operating outside leased boundaries in Liverpool Bay. Will it happen again? Could these farms if approved eventually again follow the same course of expanding beyond their boundaries unpermitted? Citizens have a right to be wary based on Cooke's own past behaviour.

I cannot stress to the ARB enough that Beach Meadows Beach is a gem to our community, our county, the South Shore and beyond. It means a lot to our family and to so many others, both local and from afar. The Region of Queens Municipality, the owner of Beach Meadows Beach Municipal Park, as well as the province, want people enjoying and accessing the beach. The \$250 000 enhancement project has seen the erection of a new building with bathrooms/showers/change rooms which will soon be open to the public and a larger and improved parking lot. Our Region has purchased and put in place a Mobi-mat for the past summer seasons so that our beach is accessible to all. They care about the beach and its users. They know people love it and are drawn here by it. The salt water marsh and the animals and vegetation that this beach and area supports are sensitive and important, as well. RQM has also been granted intervener status in the hearing of these applications. They must have concerns.

I thank you for taking the time to read this, lengthy as it was. It was borne from a love for the ocean and this area. Who is to say that once ruined Liverpool Bay or Beach Meadows Beach could be brought back to what we know now? We are decades in time from where we polluted without care. We are experiencing now the results of decades when we did. We must do better. Liverpool Bay and our Nova Scotia waters require respectful use and forward thinking for their healthy preservation. On behalf of myself and my family and appealing to you on behalf of my teens and their peers (the next generation) and asking you to keep foremost in your mind future generations beyond that, I ask that the ARB deny these applications that would see the potentially negative effects of 1.8 million salmon farmed intensively in open-net pen cages in Liverpool Bay.

Respectfully submitted,

Anne Laws

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:08 am, Feb 06, 2024

February 5, 2024

Elizabeth L Fraelic

Brooklyn, NS

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

I feel compelled to add my voice to the opposition to the proposed increase in boundaries for Kelly Cove Fisheries in Liverpool Bay.

I was born in Liverpool and have lived here my entire life. I have been married for almost 49 years to a fisherman. We have been blessed with the bounty of the sea and Liverpool Bay. From my childhood on, I have gone to Beach Meadows Beach – a pristine sand beach within 10 minutes of our home, and enjoyed by many, many residents. I am now taking my grandchildren there. I remember when the first salmon cages were set up and how everyone watched with excitement/trepidation. So far, this site seems to have been successful. However, the increase proposed is NOT desirable in the least.

My concerns are:

Optimum Use of the Marine Resource

- Liverpool Bay is a harbor rich in marine resources. Fishing for lobster, mackerel, herring, as well as the seasonal harvesting of sea moss, is an economic mainstay of our area, and supports many local businesses.

- The lobster fishery alone is the largest economic fishery in Nova Scotia, currently worth over one billion export dollars yearly. Liverpool Bay directly supports many lobster fishers and their enterprises.
- Lobsters come close to shore to lay their eggs. The larvae, as part of their development, float to the surface as small lobsters and remain floating for some time. At this point, they are susceptible to predators, waves and weather. To add to the predation, imagine lobsters floating near a pen full of hungry salmon. It takes seven years for a lobster to become mature enough for harvesting. Imagine a large hatch of lobsters being gobbled up by salmon, only to wonder seven years later what has happened.
- The waterway of Liverpool Bay is popular for recreational boats on the water in season, as well as access to the Brooklyn Marina. From a tourism point of view, I cannot believe that having open pen fishing on either side of the approach to our harbor, as well as the intricacies of navigating the leased areas is in any way desirable.
- The harbor is also an ice-free avenue for commercial vessels accessing the docks at both Port Mersey and Mersey Seafoods. How would this affect their vessel traffic? If economic opportunities presented in future that required access for large vessels, would it be possible?

CONTRIBUTION OF THE PROPOSED OPERATION TO THE COMMUNITY AND PROVINCIAL ECONOMIC DEVELOPMENT

- As I understand it, Kelly Cove Salmon provides minimal direct economic benefit to the Regional of Queens Municipality. I personally live on the harbor and used to see the boats going in and out to tend to the salmon at the Coffin's Island site. Feeding now takes place automatically by computer from Bridgewater with monitoring by cameras from there. There is still a barge and several small boats that go back and forth periodically, but how many families are supported by this operation daily?
- Kelly Cove Salmon uses the Brooklyn wharf to dock their boat. They use the wharf when they are harvesting salmon. However, the salmon are loaded on the truck and immediately leave Nova Scotia for processing elsewhere. Again, no economic benefit locally. In summary – what possible reason would there be to risk our own resource and harbor to a company that provides nothing in return? This is not sound economics.

PUBLIC RIGHT OF ACCESS

- I have concerns about the ability for marine traffic to access our harbor, to fish lobster, to fish nets. There is a buffer zone around those lease sites. How will it be possible for other vessels to easily navigate our inner harbor while obeying the rules to avoid three large aquaculture cites? How will it affect lobster fishermen trying to set and maintain their traps?

Summary:

As taxpayers and residents, we have a vested interest in our area and a right to participate in discussion and decisions regarding management of our surrounding lands and waterways. The government has their rules and regulations, but it is not to be forgotten that the citizens elect the government as our representative, to listen to and represent our concerns and wishes.

The risks of additional feedlots of salmon in our harbor are too much to bear. The effect on our fisheries, both commercial and Native is unknowable and incalculable. The sacrifice of the possible health of Liverpool Bay, its beauty, its access, its fisheries – is too high a cost, for no foreseeable benefit. The loss of such could never be recompensated.

I am firmly against approval of the proposed leases to Kelly Cove Salmon Ltd.

Respectfully submitted,

[REDACTED]

Cheryl and Stephen Beaton
 [REDACTED]
 Brooklyn, NS
 [REDACTED]
 Cell: [REDACTED]
 Em: [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 1:28 pm, Feb 06, 2024

February 5, 2024

Sent via email: Aquaculture.Board@novascotia.ca

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

Re: The application by **KELLY COVE SALMON (also known as KCS)** 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 Chair and Board:

We are writing to make our concerns about this fish farm expansion and two new marine licenses known. My family have lived in Queens County our whole lives. My Step-father was a fisherman and so are(were) my beloved brothers, step-grandfather, uncles, cousins and some of my dearest friends.

Section 3 - Factor c) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

The Brooklyn site AQ#1432 is very close to our home port (*2/10th of a mile*) and fishing grounds.

The Mersey Point site AQ#1433 is close to our home (*2.5 miles as the crow flies*) and to the port and fishing grounds.

Many members of my family fish for lobster in Brooklyn and Liverpool Bays and surrounding areas. They also fish for herring, mackerel, groundfish and harvest Irish Moss. Our livelihoods (*and many others who depend on us for their own food source*) are entirely dependent on a healthy ecosystem and sustainable fisheries.

Industrial scale Fin Fish farms will damage the habitat for many species. These sites are very good lobster habitat and we cannot stand back and see it be damaged by fin fish waste and chemicals and deprive the food insecure, people within our community, a further loss of sustenance. **Please remember that Nova Scotia is second to Maine for having the highest lobster rating in the world for a reason.**

If KCS has to use pesticides on the sea lice this could harm the lobster larvae that float on the surface in July and August every year.

Section 3 – Factor a): The optimum use of marine resources:

Industrial scale fish farms are not the best use of our marine spaces. Wherever these large-scale fish farms operate they saturate the environment with pollution, disease and sea lice. These sites are planned for very shallow waters that will not flush well. We do not have the strong tides that the Bay of Fundy has. **If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically affected.** Liverpool Bay is already being used optimally, sustainably by many people in many ways. **Please do not allow Cooke's to displace our fishers, our plant harvesters, our recreational boaters, our divers, our kayakers, and our beach enthusiasts.**

Our community will pay the highest price if this experiment fails. *Why ruin our marine habitat for a business that offers very little to Queens County in comparison to what already exists?* A huge fish farm will bring pollution to our beautiful bay and change our way of life. We want to see our local businesses continue to thrive and our community healthy for the sake of our children and grandchildren.

There has been only **ONE PUBLIC MEETING, FIVE YEARS AGO**, to **VOICE OUR CONCERNS**. The community should have a say in whether or not our waterways are damaged by companies from other provinces, other countries, **especially more so when we are a county with FEW RESOURCES, to feed our community who are already experiencing HIGH FOOD INSECURITIES as it is, with little if any financial or other resources to our aid!!!** As these companies are kicked out of other countries, it will put more pressure on Nova Scotia to accept them.

This province is one of the last places that has “clean – almost pristine” water. New Brunswick and Newfoundland are already full of disease and sea lice. Please do not allow our waterways to be poisoned with fish farm waste and chemicals. **If fish farms are being closed down on the West coast of Canada they should be closed down on the East coast as well!!!** We do not want to be treated like the “poor cousin” that has to accept pollution just to benefit International Corporations that take most of their money elsewhere. Or that the perception is we are so insignificant it doesn't really matter, or even that we don't know any better. Our province is unique for a reason - because we are honest, have integrity, work hard and more importantly we keep things pure.

Thank you for your consideration, and discernment, of our objections - **BASED ON FACTS** - of this Cooke Aquaculture (*Kelly Cove Salmon*) expansion in our small local community which is trying to maintain what little pure livelihood we have.

Respectfully yours,

Cheryl and Stephen Beaton

Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc Minister of Environment, Hon. Tim Halman
Cc Prime Minister, Hon. Justin Trudeau
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds

RECEIVED

By Nova Scotia Aquaculture Review Board at 1:32 pm, Feb 06, 2024

February 5, 2024

James C. Fraelic

[REDACTED]
Brooklyn, Queens County
Nova Scotia [REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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, NS.

My comments below will relate to the following factors as listed in Section 3 of the regulations:

- c) Fisheries Activities in the public waters surrounding the proposed aquaculture operation**
- f) The public right of navigation**

I wish to convey my objection to the application by Kelly Cove Salmon for an increase in operation in Liverpool Bay, Queens County, NS

I am a lifelong resident of Brooklyn, NS and have a lifetime of experience as a fisherman in these waters. My father, my brother and I all made a living fishing in these waters over the past fifty+ years. We have fished cod, pollock, hake, mackerel, haddock and lobster. I am very concerned about the future of our fisheries with the added stress of a large increase in open pen finfish farming.

1. Liverpool Bay is very important in the life cycle of lobster. In the spring and summer, lobster migrate to the shallow, near-shore waters of bays and harbors along our coast. Liverpool Bay is no exception. The lobsters that molt, breed and lay eggs not only remain near shore, but over time move to different areas and depths of water, contributing to the overall biomass of the lobster stock. The lobster fishery has proven to be not only a very successful industry but is also Nova Scotia's most valuable seafood export.

Disruption in the life cycle of the lobster could possibly be impacted with the expansion that Kelly Cove Salmon Ltd. is putting forward for approval. After lobsters hatch and form larvae, they head to the ocean surface. One concern would be these tiny lobsters surfacing under a fish cage or floating through an aquaculture site. Imagine the possible result that hundreds of thousands of hungry salmon could have on the lobster larvae at this stage of development. As it takes approximately seven years for a lobster to come to harvesting size, this would be devastating. The environment, the weather, and predators are all challenging enough for the survival of a lobster, without the possible threat this expansion could have.

2. Another concern is the tremendous amount of effluent that will be created. Although there are studies, both Pro and Con, on the effects of salmon waste, I feel strongly that it is not worth the risk to both juvenile and adult lobsters. The contents of salmon waste may be up for discussion, but the fact remains there will be a huge increase in quantity. Whether this waste stays near the cages, or flushes away, it remains in the ocean. The lobsters in Liverpool Bay and surrounding areas could be in jeopardy.
3. Pelagic fish such as herring and mackerel occupy most bays and harbors at some point in the year as they migrate. The addition of two very large aquaculture sites on each side of Liverpool Bay could likely disrupt the traditional patterns of such fish species. The Department of Fisheries and Oceans already closely monitors these species. Mackerel fishing is now closed to all commercial fisheries, while a small recreational fishery is permitted.
4. The very large areas being applied for lease are being fished by commercial fishers. Lobsters, groundfish, mackerel and herring all contribute to a fisher's total annual income. This is a large economy in our area.
5. Navigation would most certainly be hindered as passing through a leased site is not permitted. This would affect fisher's, recreational boaters and larger vessels trying to access our harbor. How would this impediment to navigation affect any future opportunities for business ventures to access Port Mersey, or the Mersey Seafoods operation in Liverpool?

For the reasons outlined above, and using the precautionary approach employed by the Department of Fisheries and Oceans Canada, I oppose the application for expansion in Liverpool Bay by Kelly Cove Salmon.

Respectfully,



James C Fraelic

RECEIVED

By Nova Scotia Aquaculture Review Board at 1:39 pm, Feb 06, 2024

From: [Sandy Brown](#)
To: [Aquaculture Review Board](#)
Subject: Application by Kelly Cove Salmon Ltd for Boundary Amendment
Date: February 6, 2024 11:05:06 AM

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AQ#1205x

AQ#1432

AQ#1433 in Liverpool Bay, Queens Co, NS

from: Sandy Brown: [REDACTED]
Western Head
[REDACTED] Liverpool NS [REDACTED]

email: [REDACTED]

My concerns are as a resident, homeowner, in Western Head, and former cottage owner in Beach Meadows, NS.

1.) That our Region has not and does not appear to benefit economically from the farm as it exists or will in the future. Eg: Road repairs due to large trucks shipping profits elsewhere.

5.) Our family, for at least 3 generations, have benefitted from the natural beauty of Beach Meadows Beach for swimming, walking, entertaining family and friends. Slime one other filth coats our rocks, sea lice abound, other contaminants.

7.) Also, it is very concerning the damage and decimation to the wild salmon populations.

Please do NOT expand these leases.

RECEIVED

By Nova Scotia Aquaculture Review Board at 1:44 pm, Feb 06, 2024

From: [Doug Frantz](#)
To: [Aquaculture Review Board](#)
Subject: Clerk of the Board Re: Kelly Cove Salmon Ltd. application
Date: February 6, 2024 11:59:47 AM

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

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Clerk of the Board:

This is a written submission to the Aquaculture Board with regard to 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

It is submitted by Paul Douglas Frantz and Catherine Ann Collins, both of [REDACTED], Lunenburg, Nova Scotia [REDACTED].

The comments related to factors B and G.

Our statement for the record is here:

In the Matter of Kelly Cove Salmon Ltd. Application

Statement of Catherine A. Collins and Paul Douglas Frantz

[REDACTED], Lunenburg, Nova Scotia [REDACTED]

The proposed expansion will have a damaging impact that extends well beyond the immediate community, and therefore our evidence should be considered because everyone who lives on the coast and wants to protect our endangered wild salmon deserves a voice in this important matter.

The threat to wild salmon and the spread of chemical waste from the proposed farms has a potentially far-reaching impact, as noted by the Department of Fisheries and Oceans in its scientific analysis in October 2022. In addition, we are not “busybodies (Leblanc, J. in *Specter v Nova Scotia*).” We are professional investigators who have researched, written, and spoken about the damage caused by open net pen salmon farms. Finally, it is standard business practice to conduct due diligence before agreeing to any high-level business partnership. We believe that the regulatory board has been remiss by not conducting its own due diligence into the historic global business practices of Cooke Aquaculture and its subsidiary, Kelly Cove Salmon Ltd.

Factors to be Considered by the NSARB

In making decisions related to marine aquaculture sites, the Review Board must take eight factors

into consideration. The following statement relates specifically to “factor (b) the contribution of the proposed operation to community and Provincial economic development,” and “factor (g) the sustainability of wild salmon.”

The information is based on research conducted for our book, *Salmon Wars: The Dark Underbelly of Our Favourite Fish*. The evidence is drawn from records of court and regulatory proceedings in Canada and the United States.

1. Cypermethrin Poisoning – 2009 to 2013

On April 26, 2013, Cooke Aquaculture subsidiary Kelly Cove Salmon Ltd. pleaded guilty to two counts of using a banned neurotoxin to combat sea lice at 15 of its open-net pen salmon farms in the Bay of Fundy. The plea was entered in St. Stephen provincial court and followed a lengthy investigation by Environment Canada.

The pesticide, cypermethrin, was smuggled into New Brunswick from Maine, according to court records. Kelly Cove Salmon Ltd. paid a fine of \$500,000, one of the largest environmental fines in Canadian history at the time.

The guilty plea followed a lengthy investigation by Environment Canada into the deaths of lobsters in storage containers tied to Cooke’s use of the banned pesticide at 15 of its salmon farms in the Bay of Fundy, according to court records. The government initially charged Glenn Cooke and two other company executives with 19 criminal violations of the Federal Fisheries Act. Each count was punishable by three years in prison and a \$1 million fine. The charges against Glenn Cooke and the other two executives were dismissed in connection with the guilty plea from Kelly Cove Salmon.

2. OPN Collapse – 2017

On August 19, 2017, a Cooke Aquaculture open-net pen salmon farm in Puget Sound off the coast of Washington State collapsed. Roughly 250,000 alien Atlantic salmon were released into waters containing endangered Pacific salmon. Escaped salmon were discovered as far away as 55 miles.

The company blamed the incident on natural causes, including a solar eclipse. An investigation by three Washington State government agencies concluded that the Cooke salmon farm had not been properly maintained and inspected. The investigation concluded that the pens were fouled with impenetrable layers of mussels, kelp, and other marine growth, which contributed to the collapse.

The company was fined USD \$332,000 by the State of Washington and some of its leases were cancelled. The report, *2017 Cypress Island Atlantic Salmon Net Pen Failure: An Investigation and Review* is available at

https://www.dnr.wa.gov/sites/default/files/publications/aqr_cypress_investigation_report.pdf?vdqi7rk

In response to the collapse of Cooke's farm, the State of Washington approved legislation banning the farming of non-native fish like Atlantic salmon in state waters in early 2018. The U.S. Environmental Protection Agency opened a criminal investigation into the circumstances surrounding the collapse; the criminal inquiry was closed without charges after a year, according to records obtained through the U.S. Freedom of Information Act.

A nonprofit organization, the Wild Fish Conservancy, filed a civil lawsuit in United States District Court in Seattle, Washington. The suit accused Cooke Aquaculture of violating the U.S. Clean Water Act by allowing non-native salmon to escape into waters home to Pacific salmon, polluting Puget Sound with debris from the collapse, and failing to conduct required inspections of the farm. Fisheries experts testified in depositions and court filings that the Atlantic salmon threatened endangered wild Pacific salmon, evidence relevant to "factor (g)" of the Review Board mandate.

The federal judge in the case ruled that Cooke had failed to provide evidence that it had carried out the mandatory inspections of the net pen moorings and anchors. The judge also found that Cooke violated the discharge permits for all its farms in Washington State by failing to accurately monitor or report the number of escapes from the farms. On November 29, 2019, Cooke Aquaculture settled the lawsuit by agreeing to pay USD \$2.75 million to Wild Fish Conservancy.

3. Hatchery Video – 2019

In October 2019, an animal-rights organization released a video from the Cooke Aquaculture hatchery in Bingham, Maine. An undercover investigator for the group, Animal Outlook, had spent four months working at the hatchery, where she recorded the brutal treatment of young salmon by workers. The organization filed a complaint with the State of Maine, which did not lead to any action against the company. The Animal Outlook video is here: <https://www.youtube.com/watch?v=8tpd3Y1X7pQ>

The final inspection report by the State of Maine concluded that the Cooke hatchery did not meet the standards established by the Global Aquaculture Alliance, an industry-financed group. The state report blamed the treatment of salmon at the hatchery on the workers and no action was taken against Cooke Aquaculture.

4. Die-off Report Delayed – August 2021

One August 16, 2021, Cooke Aquaculture employees discovered that more than one hundred thousand salmon had died at two of its farms off the coast of Maine near Bar Harbor. The die off was reported on August 27 to the Maine Department of Environmental Protection. At the time, the company blamed the deaths on “uncommonly low oxygen levels in the cages,” but offered no explanation for the low levels.

An internal email from the Department of Environmental Protection indicated that one of Cooke’s site managers told Maine authorities that the nets “had a lot of algae growth and were cleaned immediately after the die off.” Fouling on nets reduces oxygen levels in salmon farm cages and increases stress on the fish. The 11-day delay in reporting the die off meant state regulators were unable to conduct their own examination of the nets, according to a second email. A month after the incident, the Department of Environmental Protection said it had found no infractions at the Cooke sites.

Conclusion

These four incidents are relevant to the Review Board’s consideration of the proposed expansion of Cooke Aquaculture’s salmon farming operations in and around Liverpool Bay. The impact of the proposed expansion would extend far beyond Liverpool Bay. As the Department of Fisheries and Oceans declared in its evaluation of Cooke Aquaculture’s proposal, escaped farm salmon pose a danger to wild salmon as far away as 200 kilometers.

February 5, 2024

Glenda Fralic

Brooklyn, Nova Scotia

E-mail:

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:32 pm, Feb 07, 2024

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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 – AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

My name is Glenda Fralic and I reside in Beach Meadows and excluding a few years spent studying and working away, have resided on ancestral property, located on Liverpool Bay.

I have given the matter of the potential fish farm expansion in Liverpool Bay significant consideration and feel compelled to share some of my thoughts of why and how this would have a significant negative impact, not only upon me personally but for the community at large.

Please indulge me, by allowing to share the story of my attachment to the land and sea surrounding the bay.

My forefathers arrived in Halifax during the mid 1700's and slowly migrated down the southern coast arriving in Beach Meadows approximately 200 years ago, making their livelihood, mainly from the sea as inshore fishers.

As recent as the 1970's my father was the holder of a Class B Lobster Licence, fished from the base of the original land grant upon which I have made my home.

Activities my family and I have enjoyed in the waters and land surrounding the bay include: tubing, kayaking, swimming, wind surfing, boating, clam digging, beach walks.... I have a great desire that these activities will always be afforded to future generations around this pristine bay that has given so much to myself, my family and ancestors.

It was during the early days of the last century that industrial growth was determined to be the means to a financially healthy local economy resulting in the damming of the once natural and pristine Mersey River to provide power to local businesses, such as the Bowater Pulp and Paper mill situated at the mouth of Liverpool Bay.

Fortunately, the economy of the local area has evolved during recent times to a point that ecological damaging activities and industries are no longer required to sustain the economic health of this area.

The knowledge that the overall health of our bay and surrounding coast line will continue, would provide great comfort to myself, family and all who reside and visit here.

I can't overstate the importance of your deliberations / decision you are about to make, upon both this and future generations. The health of the bay and surrounding coastline is paramount to the health of the natural ecosystem that sustains us all.

My understanding for purposes of deliberations, you the ARB Board, have been mandated as a minimum to consider factors that fall into eight categories. However, I would encourage you to take a broader approach when considering the very significant impact this expansion proposal will have on the bay and those that live around it, not just at this point in time, but with an eye to potential future impacts.

Myself and family, are blessed to be the caretakers of approximately 32 acres, contained in 4 parcels of land, much of which is pristine coastal salt water marsh and sand beach. I have witnessed many changes over the years to this and surrounding environment, of greatest concern is the number and intensity of storms and how they impact the coast line. We unequivocally know this trend will only continue in an exponential fashion.

I have witnessed first hand the negative impacts of the existing fish farm operation over the years. Entire fish cages, missing their fish content, washing up on the adjacent Beach Meadows Beach. Countless numbers of navigational buoys, escaping their anchorage, many breaking up and releasing millions of styrofoam beads into the environment directly impacting the environment of my shared coastline. I witnessed the significant damage to the existing fish farm in September as a result of the named storm, Lee. Having completed a degree in biology and educating myself upon the impact of open net fin fish industry, I possess at least an appreciation of the detrimental impacts you, the board, will need to consider in this application process. I know them to be significant.

I believe comments provided speak to many of the factors you are required to deliberate upon. Perhaps the one factor that really speaks to me that as a Board you must consider is "other users of public water surrounding the purposed aquaculture operation". What occurs within and around the purposed operation will impact all of us who want to ensure and enjoy a pristine coastal environment moving forward. It's undeniable, this industry pollutes.

Will I every again enjoy the beach, the water the same way as before? Will I be encouraging my grand children to spend time in the bay's water as I and my children did as children? Sadly, if this application is approved, I think not.

Regards,

Glenda Fralic

Cc Honourable Premier Tim Houston, PREMIER@novascotia.ca
Honourable Minister Kim Masland, publicworksminister@novascotia.ca
Honourable Minister Kent Smith, MINDFA@novascotia.ca
Honourable Minister Tim Harman, minister.Environment@novascotia.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:37 pm, Feb 07, 2024

From: [Janine Stewart](#)
To: [Aquaculture Review Board](#)
Cc: [Kim Masland](#); [Premier](#); [Minister DFA](#); rick.perkins@parl.gc.ca; DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca; [Minister, Env](#)
Subject: sending on behalf of Jaime Westhaver, submission to ARB re Kelly Cove Salmon
Date: February 6, 2024 9:07:51 PM

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Jaime Westhaver
[REDACTED]
[REDACTED]
Liverpool, NS
[REDACTED]

February 6, 2024

Via email: Aquaculture.Board@novascotia.ca

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

Re: The application by KELLY COVE SALMON 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 Board:

I am an outdoor enthusiast and enjoy walking beaches, canoeing, kayaking and recreational fishing. I do not want to see our beaches and harbour ruined by 60 fish pens and the waste of over one million salmon.

Some of my family members have been fishing in Liverpool Bay and area for many years and we have lived in the area for generations. Many members of my family fish for lobster in Liverpool Bay and surrounding areas. They also fish for herring, mackerel and groundfish. Their livelihoods are entirely dependent on a healthy ecosystem and sustainable fisheries. The two new sites at Mersey Point AQ#1433 and Brooklyn AQ#1432 and expanded Coffin Island site AQ#1205x will hinder their ability to fish the harbour safely and will damage the habitat for many species of creatures. If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically decreased. (Section 3 - Factor c) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

We do not have the strong tides that the Bay of Fundy has so the

shallow waters of Liverpool Bay do not flush as well.

Our community should have a say in whether or not our waterways are damaged by companies from other provinces or countries. There has been only one public meeting, five or six years ago. I do not think this is right, they should have to engage with the community and “be good neighbors”.

Sponsoring a couple events does not make up for bringing harm to existing business and the people of Queens County. Other counties are trying to kick Cooke Aquaculture out of their space, we should do the same.

I don't think that a huge 60 pen fish farm is the best use of our marine spaces. Liverpool Bay is already being used optimally by many people in many ways. Please do not allow Cooke's to displace our fishers (Commercial and Aboriginal), our marine plant harvesters, our recreational boaters, our divers, our sailors, our kayakers, our beach walkers. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice and it will have a negative effect on many people. (Section 3 – Factor a): The optimum use of marine resources)

It seems like the DFA is willing to conduct this big experiment in our harbour for the benefit of this foreign company. DFA is using our tax dollars to promote and protect an industry that could cause the decline of those very same tax dollars if our local industries are harmed.

I feel that holding these fish in high densities will amplify the quantity of sea-lice, infestations, bacterial disease and viral outbreaks like Infectious Salmon Anemia (ISA). The users of the harbour and beaches know there are currently sea lice present and huge numbers of salmon will increase the number of sea lice to a dangerous level.

Our community will pay the highest price if this experiment fails. Why ruin our harbour for a company that will pollute the bay and then walk away without cleaning up the mess left behind. I don't think it is worth the risk.

If our harbour and ecosystem are damaged it could take decades for it to recover. We would welcome a fish company if they were doing land-based fish farming. This province is one of the last places that has nice “clean, cold” water. That is why these companies want to come here, they have already polluted the rest of the places that have cool water. Please do not allow our water to be poisoned with fish farm waste, disease and chemicals.

Thank you for carefully considering my objections to this Cooke Aquaculture/Kelly Cove Salmon expansion in my community.

Yours truly,
(sent via email)
Jaime Westhaver

Cc MLA, Hon. Kim Masland Kim.maslandmla@gmail.com
Cc Premier, Hon. Tim Houston PREMIER@novascotia.ca
Cc Minister of DFA, Hon. Kent Smith MINDFA@novascotia.ca
Cc MP, Hon. Rick Perkins rick.perkins@parl.gc.ca
Cc Minister of DFO, Hon. Diane LeBouthillier
cc DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca
Cc Minister of Environment, Hon. Tim Halman
ccMinister.Environment@novascotia.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:41 pm, Feb 07, 2024

NSARB-2023-001-WRT-046

Mr. Ted Dickie

Brooklyn, NS

February 4, 2024

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

E-mail: Aquaculture.Board@novascotia.ca

Dear NS Aquaculture Review Board:

This letter is my expression of opposition to 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”.

The expansion is at Coffin Island and the new sites are Brooklyn and Mersey Point. I am asking to have these applications denied.

I make reference to Section 3 of Aquaculture License and Lease Regulations, subsections
(D) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation
(E) the other users of the public waters surrounding the proposed aquaculture operation
(F) the public right to navigation
(G) the sustainability of wild Salmon

To begin, I am a longtime resident of Queens County and thoroughly understand the importance of economic development. I am proud of our family history related to Liverpool Bay. I conclude our Lobster Fishery and Tourism to be positive economic drivers for our area. I am also aware that our coastal community is highly recognized as a beautiful place to live. Real estate benefits have been successful, and I fear that this can turn around with the negative impacts of Open Pen Fish Farms in close proximity.

My home in Brooklyn is a 30-minute walk to our cabin in Beach Meadows along a beautiful coastal shore, except for the sight of the present Fish Farm AQ#1205x lodged between Coffin Island and the roadway. I have had the good fortune to have a log cabin adjacent to Beach Meadows Beach () for most of my life (70 year period) and have enjoyed our property, the adjacent landscape and white sand beach and waters immensely. The area is very meaningful to us as our family and friends have had numerous opportunities to engage in physical activity (Section 3: Factor E), eg: beach combing, photography, picnics, swimming, surfing, boating and just relaxing and observing the beautiful shore and ocean as it appears. My desire is that our family will have the same gifts for generations to come.

There have been many concerns with the existing Open Pen Aquaculture Site AQ# 1205x, particularly as it has grown in capacity and activity in the past 8-10 years. The original farm of 6 pens of trout grew to 14 pens as an active Aquaculture Salmon Farm with capacity for 400,000 fish. This idea of adult size salmon within pens is the direct antithesis of Wild Salmon. The Mersey River, mouth of Liverpool Bay historically had been an active salmon fishing area and the Medway River within 11 km of the pens continues in this capacity. The threat of escapee and wild Atlantic Salmon genetically intermixed is frightening (Section 3: Factor G).

Over the years I have travelled the waters between Beach Meadows Beach to Coffin Island and to the shores of Liverpool Bay, including Brooklyn, Mersey Point and Liverpool. I have done this by **rowboat in my early years, canoe and sea kayak** in later years (Section 3: Factor E).

On occasion I had the opportunity to sail from the local marina. Every memory is a glorious one of our travels and, many photos exist of times in the past. It is clear that with the expansion of Site AQ#1205x and addition of other two sites, the prior routes are now considered unsafe and obstructed. This will definitely be the case with any type of expansion in the future and the public waters unable to navigate (Section 3: Factor F).

Aquaculture Site AQ#1205x is located within 0.5 Km of Beach Meadows Beach and 0.5 Km of Coffin Island. Both areas are **ecologically significant** and the Beach itself is identified as a Protected Area. The channel of water where Site AQ#1205x is situated is approximately 50 feet in depth. Behind the white sand Beach is a unique **Salt Water Marsh/Meadow** which borders my cabin property and **"Sweet Grass"** is harvested to this day by First Nations people. Many of them travel from outside of Queens County to harvest this Sweet Grass. They have stated it is the best Sweet Grass in the province (Section 3 Factor D a unique biophysical characteristic).

I strongly oppose the expansion of Lease AQ#1205x in Liverpool Bay. I say this due to the deleterious effect of the Aquaculture Open Pen Salmon Farm. We believe it has a significant impact on the natural ecosystem of land and water. I believe this to be true due to the salmon waste matter and the use of pesticides, antibiotics and food pellets used in the operation. There is a direct threat to our unique coastal ecosystem and habitats, including Lobster larvae habitat. There is a direct threat and existing impediment to the natural waterways and the public right of navigation (Section 3: Factors D, E, F).

In observations in the past 10 years, I have frequently witnessed increased mounds of kelp/seaweed on Beach Meadows Beach, which I believe are related to higher nitrogen accumulation from salmon waste. It has washed in on the Beach with tides and we believe is filled with aspects of salmon waste. The mounds of seaweed move in directions indicative of currents and winds as we observe frequently ...from Southwest where Site AQ#1205x is located to the Northeasterly direction of Beach Meadows Beach. In this mixture is bright green algae blooms. In days or weeks this accumulation is buried in the far end of the Beach and Ocean Channel, which we call the Creek. Over time, this accumulation has altered the Beach and Salt Water Marsh/Meadow area. The area now has layers of accumulated algae growth which is easily visible. This growth has **altered the physical structure with a narrowed channel**, and malformed clam shells (once a safe harvesting spot). Due to the physical change of this water channel and infilling due to excess Seaweed mixture, the waterway is now completely impassable for a boat, as it once was (picture below of narrowed channel). It is expected the ecosystem will be further changed due to the debris and accumulated masses buried in the sand (Section 3: Factors D, E, F)



I have witnessed a decrease in migrating and nesting birds. The Piping Plover, now endangered no longer nests on our shore. Terns, Sandpipers, Willets, Blue Heron all in lesser numbers. I have witnessed changes in mollusks and shellfish life. Many are gone, we no longer see urchins, star fish and there is reduced numbers of snails and clams. The shells are misshapen, discoloured or smaller in size.



The **tidal Salt Water Marsh flats have been drastically altered** in the last 10 years. When our children were young, this was the spot to swim and dig healthy clams but it is certainly no longer the case. (Section 3: Factors D, E, F)



Tidal Salt Water Marsh

In 2018, an unsightly “houseboat” appeared at site AQ#1205x. It was an automatic feeder barge which not only reduced jobs but had an unnerving sound at all times. Towards the end of the 2018 summer, the water warmed and while swimming a family member was surrounded by a very unusual hatch on the water. The small insects adhered to their skin which I believe was sea lice looking for a host.

In March, 2019 a super-chill, (a phenomenon where sustained coldwater temperatures drop to the level that freezes fish blood, which is around -0.7°C), occurred and for several weeks fish corpses were removed from the pens. On occasion, adult fish farm salmon have escaped from the cage at AQ#1205x and ended up dead on our beach shores (picture above). (Section 3, Factors D, E)



The Buoys have come ashore in form of thousands of little white beads at various times, especially following storm surges. We have observed increased seal population and, on a few occasions, seals have been witnessed dead on beach with bullet wounds (picture below). In the summer of 2023, a brown sludge was noted floating from southwest on the surf of inshore waves while I was swimming.

Black composite piping from the pens lay on the Beach following a wind storm this past fall Sept 2023 (picture below) (Section 3: Factor F).

My observations confirm some of the negative impacts of Site AQx#1205, which I expect will only increase if the expansion is approved.



The existing Aquaculture Site AQ#1205x has no economic benefit to our area and is a threat to our natural ecosystem and marine habitat. It has obstructed our natural waterways between two

highly environmentally significant areas, Beach Meadows Beach and Coffin Island (Section 3: Factor D).

The Municipal Park adjacent to Beach Meadows Beach is a wonderful asset to our area and brings numerous persons for various recreational activities and offers a place for enjoyment, relaxation and contemplation (Section 3: Factor E).

I strongly object to any expansion of existing Open Pen Farms, Site AQ#1205x (Coffin Island) and new Sites AQ#1432 (Brooklyn); AQ#1433 Mersey Point) in Liverpool Bay which is the mouth of the **Mersey River**. This river historically has been an active Salmon River and well known in any circle of Salmon Fishers and considered to be one of the best in all of NS. The reality is in present day the good fortune in casting a fly and hooking a Salmon is very unlikely but the Mersey River remains active for trout fishing (Section 3: Factor G Sustainability of Wild Salmon).

The mouth of the **Medway River** which is approximately 11 km away from Site AQ#1205x and historically had attracted anglers from USA and many parts of Canada, is a hopeful situation yet. However, every effort must be in place to preserve its suitability for returning Wild Atlantic Salmon. It is known a few return every year and every effort must now be in place to preserve its capability and return of Wild Atlantic Salmon from their migratory journey. It is a fact that these Wild Salmon must be preserved. (Section 3: Factor G Sustainability of Wild Salmon).

I have been dedicated to **Salmon Fly Fishing** for a 50 year period and of course very much support Catch and Release. The Medway, LaHave, Stewiacke and Margaree Rivers have all been an amazing pleasure in my life. The Atlantic Salmon, a beautiful species, is an absolute thrill to spot and any anglers' dream. There is little that equals standing in a river and casting a fly. Fly tying is a passion of mine and a hobby I still continue and thousands I have completed.

For your clear understanding, the life of our Wild Atlantic Salmon is far different than that of Salmon raised in open pens like Coffin Island Site AQ#1205x. Genetically there is absolutely no similarities in their existence. Our Wild Atlantic Salmon of Nova Scotia make the annual trek to the shores of Greenland and return to their river of birth. The female Salmon lay their eggs in the very spot they were born. A Salmon spending one year at sea returns to the same river as a grilse and weighs 4-6 lbs. It continues with the annual trek, unless obstacles overcome, and weigh upwards to 25-35 lbs. at their maturity of 10 years. (Section 3: Factor G Sustainability of Wild Salmon).

The life of this **Wild Atlantic Salmon is extraordinary**. The life of an Open Pen farmed Salmon is totally different. Food sources, antibiotics, hormones, all used to create an abnormal, fast growing, huge salmon weighing 20 lbs. in 2-3 years (full maturity). Their existence is fight for survival as they are housed in a crowded fashion with movement in circular patterns in a restricted pen. Thousands are penned in a method that is reflective of animal cruelty and should be banned. The amount of waste matter is enormous. The present AQ #1205x pens are approximately .5 Km from Beach Meadows Beach and .5 Km from Coffin Island with a depth of approx. 15 feet between bottom of pen and the ocean floor. (Section 3: Factor G Sustainability of Wild Salmon).

The significant fear is that an escapee from an open pen farm is very alarming to a Wild Atlantic Salmon. If any mating is done the gene pool is altered forever. Time is of the essence to

preserve the Wild Atlantic Salmon before it becomes extinct. It is presently a **Species at Risk** and requires the Aquaculture industry to remove their threat from our Ocean waters. (Section 3: Factor G Sustainability of Wild Salmon).

Efforts in the past to find ways to save Wild Atlantic Salmon or similar fish have been dismissed. An example of such is the research that took place within the last 10 years to save White Fish in the Mersey River Hatchery only to end in failure when the hatchery closed. The White Fish with a similar genus to Wild Atlantic Salmon were eventually released in lakes in Dartmouth, NS area and subsequently died as they had no access to Ocean waters. (Section 3: Factor G Sustainability of Wild Salmon).

You, the Board, have the responsibility to stand firm and to adamantly oppose any expansion of Open Pen Salmon in public waters. It is my understanding you are independent of government and industry ...so for the sake of preserving the Wild Salmon ... **do the honourable thing** ...and listen to all points from this community at large.

I am very distressed the Ecology Action Centre was denied the opportunity to be an Intervenor at the adjudication hearings. The Hearing needs to be an open process and not in any way show preference for Cooke Aquaculture (KCS).

Locally, we do not want Open Pen Fish Farms in our Ocean water. This not only threatens and poses risks for the Tourism and Lobster industry, but plays havoc with the Natural Environment which includes a mile long white sand beach and beautiful coastline and does little for our local economy.

The preservation of Wild Atlantic Salmon is paramount and the local rivers are a good start and need protection from any Salmon escapees of Open Pen Fish Farm. The best way to protect is say NO to Open Pen Salmon Farms.

Millions of dollars have been spent on cleanup efforts of the old Abitibi Bowater's plant site in the past and by Queens County to improve infrastructure for sewage disposal of countless homes adjacent to Liverpool Bay. To expand or approve any Open Pen Aquaculture Site in Liverpool is an escalating threat and wrongdoing to our coastal community.

Climate change is present and we have seen devastating effects from storm surge in our area, changes in our ocean temperatures and greater wind velocity. We collectively need to go forward in every effort to preserve and protect our natural environment and definitely this includes our Ocean Waters and the adjacent lands on shore.

Once again, I express my opposition to the fish farm and am asking to have these applications denied.

Submitted,

Ted Dickie

RECEIVED

By Nova Scotia Aquaculture Review Board at 3:56 pm, Feb 07, 2024

NSARB-2023-001-WRT-047

Cathy Raddall

[REDACTED]
Liverpool, NS
[REDACTED]

Aquaculture Review Board
60 Research Dr.
Bible Hill, NS
B6L 2R2

RE: ARB – Lease #1433 and #1432

I have been a property owner on the west side of Liverpool Bay for 35 years. My husband and I built our house in 1991 and we currently own just over seven acres and have approximately 700 feet of ocean-front property on Liverpool Bay which directly overlooks the proposed fish farm site #1433, and site #1432 is one kilometre away directly across Liverpool Bay.

I am very concerned about the proposed industrial, large-scale fish farm and its impact on the value of our property, the effect of constant noise (diesel generators from the “feeder barge”), bright lights, pollution and the obvious negative impact on our pristine views of Liverpool Bay. I am an avid gardener and I spend countless hours cultivating our gardens and enjoying the peace and quiet that allows my passion to be so fulfilling. The presence of not one, but two large fish farms located in such close proximity to my property will undoubtedly have a significant direct and negative impact on our ability to enjoy our property as we have become accustomed to. I cannot overstate the harm that these two 40-hectare sites (#1433 and #1432) and associated immediately adjacent noisy barges will have on our well being.

We have raised our children in this pristine environment; they learned to swim in front of our home, we regularly walk the beach, enjoyed kayaking, and recreational boating in Liverpool Bay for decades. We have witnessed ferocious storms, the surges and documented coastal erosion which compounds the negative impact of placing this industry in close proximity to homeowners who purchased and invested in their properties. There is a mountain of evidence that demonstrates that the fish farm proposal is an outdated model, does not respect climate change, and perhaps most importantly, lacks the social license needed to proceed.

Please protect our pristine bay and respect the wishes of the adjacent property owners and the citizens of Queens. This is indeed a precedent-setting case and history will not be kind if the ARB chooses to ignore the evidence and the will of the citizens/taxpayers.

Sincerely,

[REDACTED]
Cathy Raddall

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:31 am, Feb 08, 2024



Clerk of the Nova Scotia Aquaculture Review Board

We are making this submission to the Board in support of the upcoming application by Kelly Cove Salmon – AQ# 1205x, AQ# 1432, AQ# 1433.

Thompson's Electric has been in business for over 30 years and specializes in marine electrical work. We have worked for Kelly Cove Salmon for the last 20 of those years. Kelly Cove Salmon has been an integral part of our company's business over the past 2 decades. Kelly Cove Salmon have provided consistent, year-after-year work for our employees.

We support many local businesses and are proud to be part of the aquaculture industry in Nova Scotia. The new sites and expansion will result in more business for us, our employees and all the businesses we support. This will result in long-term job security for additional employees of our company and allow us to support additional local businesses for many years to come.

Thanks,

Tom Thompson

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:35 am, Feb 08, 2024

From: [danny westhaver](#)
To: [Aquaculture Review Board](#)
Cc: [Premier](#); [Minister DFA](#); [kim.maslandmla@gmail.com](#); [Minister, Env](#); [Health and Wellness Minister](#); [Economic Development Minister](#); [garyburrillmla@gmail.com](#); [leader@greenpartyns.ca](#); [rick.perkins@parl.gc.ca](#); [justintrudeau@parl.gc.ca](#); [DFO.Minister-Minstre.MPO@dfo.mpo.gc.ca](#); [ministre-minister@ec.gc.ca](#); [ministerofred-ministreduder@ised-isde.gc.ca](#)
Subject: Re: KCS expansion in Liverpool Bay
Date: February 7, 2024 1:44:55 PM

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Daniel Westhaver

[REDACTED]

Greenfield, NS

[REDACTED]

[REDACTED]

[REDACTED]

February 7, 2024

Clerk of the Board

Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

RE: The application by Kelly Cove Salmon Ltd. (KCS) for the Proposed Expansion of Fish Farming - (AQ#1205x, Coffin Island) and two New Marine Fin Fish Aquaculture Licenses AQ# 1432 (Brooklyn), AQ#1433 (Mersey Point) Liverpool, Queens County) In Liverpool Bay, Nova Scotia

Dear Chair Person and Board Members:

My name is Daniel Westhaver, and I am writing to you as a professional fisherman with deep-rooted ties to the fishing community in Liverpool Bay. I have been fishing in Liverpool Bay for over 30 years, my homeport is Moose Harbour and often tie up in Liverpool at the town wharf, I fish for Lobster, Herring, Mackerel and Groundfish.

I am reaching out to express my grave concerns regarding the proposed expansion of fish farming in Liverpool Bay and in our region. I am writing to request the ARB deny the fish farm

application.

While I understand that some people believe aquaculture is important in meeting the growing demand for seafood, I would like to highlight several critical concerns associated with the proposed expansion as noted in Section 3 of the Aquaculture License and Lease Regulations a through h.

Impact on Navigation and Waterways:

The structures and infrastructures used for maintaining, monitoring, and transporting fish and supplies are expected to obstruct the passage of our commercial and recreational vessels. This increased activity may cause congestion in the waterways, raising safety concerns and disrupting the smooth flow of navigation. If large structures are added close to the shoreline it adds challenges for our vessels to navigate safely in the area, especially when it is stormy and windy. We need flexibility to choose the safest route to and from our fishing grounds. We want to get home safely to our families each evening.

Nutrient Load Levels, Oxygen depletion, and Sedimentary Buildup:

Beyond navigation challenges, the expansion of the fish farm is likely to significantly impact nutrient load levels in Liverpool Bay and the surrounding areas, potentially resulting in oxygen depletion and sedimentary buildup that could disrupt the bay's delicate ecosystem. Liverpool bay is important nursey habitat for many species and marine plants (lobster, herring, crabs, mackerel, kayak, eel, Irish Moss, Rock Weed). This ecosystem disruption will spill over to the coastal lands of Coffin Island and Beach Meadows Beach which have already been identified by the Province as being Environmentally Significant Wetlands.

Uncertain Effects of Chemicals, Pesticides, and Hormones

There is a lack of conclusive evidence demonstrating that the chemicals, pesticides, hormones, antibiotics, and other aquaculture-related materials used in the fish arm won't adversely affect the wild fish stocks in the region. There should be no new leases issued until more studies are done n the effects of these pesticides and chemicals. It is not good enough to say "we don't expect to use them and if we do a Veterinarian will be present". The Federal Department of Fisheries applies the Precautionary Principle in these situations. The precautionary principle recognizes that in absence of scientific certainty, conservative measures can and should be taken when there is knowledge of a risk of serious or irreversible harm to the environment and/or resources using best available information,

Genetic Changes in Wild Populations:

Escapees from the fish farm may enter wild populations, leading to genetic changes that could reduce the fitness and adaptability of the wild salmon posing a threat to their long-term survival.

Alteration of Behavior and Migration Patterns:

The establishment of the fish farm has the potential to alter the behavior and migration patterns of wild fish including salmon, significantly impacting traditional fishing practices that rely on the predictable behavior of these fish.

Economic Impact:

Given the economic importance of Commercial fishing in our community, it is crucial to ensure that the expansion does not adversely affect the local fishing industry in the area. The application does not indicate that the impact on the local fishing industry has been adequately considered (as supported by the above arguments). Unless there is clear and convincing evidence, along with assurance that these issues will be effectively addressed to the satisfaction of local fishermen, the approval of any expansion issues will be effectively addressed to the satisfaction of the local fishermen, the approval of any expansion of fish farms in the area must be withheld. Introducing such farms without careful consideration could lead to economic displacement for local fishermen, triggering a chain reaction that negatively impacts the well-being of their families and, consequently, detrimentally affects the entire local economy. If the habitat for lobster larvae is damaged it could have long lasting effects on the catch rates for decades.

Around the world many countries/jurisdictions are banning open pen fish farms because of the damage being done to the coastal waterways (Chile, Argentina, British Columbia, Washington State). Other places are seeing huge public opposition to the method of fin fish farming (Scotland, Norway, Iceland, Tasmania) As these companies are forced out of other places there will be added pressure on Nova Scotia.

Nova Scotia is one of the last places in the world with clean water and beaches, let's keep it that way!

In every place that large numbers of fin fish are farmed, there is always an increase in sea lice and pathogens and disease. If the farms are too large it is inevitable that the operator will not be able to control the number of sea lice and amount of disease. I feel these fish should be raised on land or not at all. We do not need salmon in our diet bad enough to risk harming our wild habitats. My family and I will only buy sustainable wild fish or salmon raised on land.

I appreciate your attention to the matter and look forward to a thorough examination of these concerns and therefore request the ARB to deny the fish farm application,

Thank you for your time and consideration,

Sincerely,

Daniel Westhaver

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:42 am, Feb 08, 2024

Susan Hunt

Mersey Point

Liverpool, NS

February 5, 2024

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

Email: AquacultureBoard@novascotia.ca

Re: The application by KELLY COVE SALMON 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 Chair and Board:

I am writing to make my concerns about this fish farm expansion known. My family has lived in Queen County our whole lives and have family working in the lobster industry.

Also, we are all **avid beach goers throughout the year** and would like to keep our beaches clean and free of pollution and sea lice.

Section 3 – Factor a): The optimum use of marine resources:

Industrial scale fish farms are not the best use of our marine spaces. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. We do not have the strong tides that the Bay of Fundy has. These sites are planned for very shallow waters that will not flush well. If the habitat is damaged, the livelihoods of hundreds of local families could be dramatically affected.

Liverpool Bay is already being used optimally by many people in many ways. Please do not allow Cooke's (KCS) to displace our commercial fishers, our First Nations fishers, our plant harvesters, our recreational boaters, our recreational divers, our sailors, and our beach goers.

Our community will pay the highest price if this experiment fails. Why ruin our marine habitat for a business that offers very little to Queens County. A huge fish farm will bring pollution to our beautiful bay and change our lives. I want to see our local businesses continue to thrive and our community healthy for the sake of our children.

Social License:

The community should have a say in whether our waterways are damaged by companies from other provinces, other countries. As these companies are kicked out of other countries, it will put more pressure on Nova Scotia to accept them.

There has been only one public meeting, five years ago, where we could voice our concerns. KCS has not engaged with our community in a meaningful way since that public meeting.

This province is one of the last places that has “clean” water. New Brunswick and Newfoundland are already full of disease and sea lice. Please do not allow our waterways to be poisoned with fish farm waste and chemicals.

If fish farms are being closed down on the West coast of Canada they should be closed down here as well. We do not want to accept pollution just to benefit International Corporations that take most of their money elsewhere.

It is also my belief that the **federal Department of Fisheries and Oceans** should be protecting our fish and fish habitat, as mandated, and not allow the Province of Nova Scotia to promote open pen fin fish farms in our waters.

Thank you for taking the time to read my objections to this Cooke Aquaculture (Kelly Cove Salmon) expansion in my community.

Yours truly,

Susan Hunt (sent via email)

Email: [REDACTED]

Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc Minister of Environment, Hon. Tim Halman
Cc Prime Minister, Hon. Justin Trudeau
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds
Cc Hon. Susan Corkum-Greek

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:46 am, Feb 08, 2024

From: JACQUELINE LEACH
To: Aquaculture Review Board; Aquaculture Review Board
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: February 7, 2024 3:29:14 PM

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Devin & Susan Mansfield

[REDACTED]
 Mersey Point, NS
 [REDACTED]

February 7th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

Hello,

We have lived in this area for 30 years and raised our family in this beautiful part of the country and we have grave concerns about the expansion of the Kelly Cove Fish Farm for the following reasons.

Firstly, feces, chemicals and antibiotics create a degraded marine environment. KCSL claims to be (and is designated as a 'farm'). Issues of runoff and pollution created by farms are properly regulated to create a clean industry. Where are the regulations in place with the existing fin fish farm AQ1205x? Why is effluent which includes feces and antibiotics allowed to be flushed into our bays twice a day, into the backyards of Nova Scotians? A large percentage of Nova Scotian homes have private and/or community access to our coastline so essentially this effluent will be flushed directly into our backyards. This is not acceptable and, with the new application, the sewage equivalent to 107,000 people piped directly into our bays. KCSL has been fined for illegal use of pesticides in the Bay Aquaculture License & Lease Regulations – Section 3 – Factor 3

Secondly, the area is used by many lobster fishermen, sports and recreational fishermen, Irish sea moss harvesters and recreational boaters and surfers. These areas support various wildlife such as seals and numerous birds including some species at risk. The monopolized use of these areas for fish farms will not deprive these other users but have the capacity to endanger and affect all of the above usages. NS Aquaculture License & Lease Regulations – Section 3 – Factor 1 of Fundy – the precedent has been set. NS

Thirdly, persistent noise, smell, and light pollution compromise our quality of life. Noise from the existing

AQ1205x can be heard and the facility is visible to Moose Harbour almost 2 km away. The indication is that a new farm located 300m offshore will be very visible and very loud to residents of Moose Harbour and neighbouring communities, including the town of Liverpool. NS Aquaculture License & Lease Regulations – Section 3 – Factor 2

In conclusion, simply we do not want the expansion application to go forward. Thanks.

Sincerely,

Devin & Susan Mansfield

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:50 am, Feb 08, 2024

February 7, 2024

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

Re: Applications for the cultivation of Atlantic salmon and rainbow trout in Liverpool Bay, Nova Scotia submitted to the Nova Scotia Aquaculture Review Board, namely, sites #1205x (Coffin Island expansion), #1432 (Brooklyn) and #1433 (Mersey Point).

This written statement is submitted in opposition to the approval of the three above-named applications.

As a resident of Queens County, I am directly affected by the quality of the environment, namely the water, the air and the food that is produced locally. In the last 12 months, I have consumed scallops and lobster from the South Shore, as well as innumerable vegetables, fruit and meat produced locally. This food—and by its ingestion the health of Nova Scotians—is unquestionably affected by the quality of its environment.

This letter addresses the following factors used to assess applications for aquaculture sites:

1. The optimum use of marine resources:

As a finite resource, oceans need to be protected and maintained. They have been altered and stressed for centuries by large-scale industrial fishing operations for human consumption or processing and by adding pollutants and garbage with little regard for the consequences. The result is a reduction in the ability of the water to sustain life and in the diversity and health of living things in and near the water.

Enlarging a high-density population of fish that adds food, chemicals, bacteria and viruses, feces, dead fish and garbage to the water is a short-sighted and dangerous use of the marine resources along Nova Scotia's coast.

2. The contribution of the proposed operation to community and provincial economic development: and

3. Fisheries activities in the public waters surrounding the proposed aquaculture operation:

The proposed operations will add some employment and cash to the local and provincial economies in the short term. However, long-term effects are likely to be

-reduction in the lobster population like that experienced in Port Mouton because of aquaculture, reducing the employment from lobster fishing and related businesses

-deleterious effects on crabs, eelgrass and other marine life, reducing employment dependent on other activities: commercial fishing, recreational fishing, clamming, recreational boating, kayaking, canoeing, surfing, scuba diving, camping, hiking, bird-watching, tourism.

-increased health costs due to ingestion of unhealthy farmed fish and other affected species.

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

Nova Scotia's economy depends on the ocean, the coast and its reputation for having a pristine environment. Residents and tourists alike expect to be able to visit and enjoy the parks, trails and historic sites without concern about their health being jeopardized by the

water, air, land or food. They expect to be able to eat locally produced food and drink without worrying about the effects this consumption will have on their health.

Approving the expansion of aquaculture in Liverpool Bay will damage the health of people living in the area, visiting from elsewhere, or consuming the products of the very industry under review.

Industrial open-pen aquaculture is a poor choice for Nova Scotia businesses, residents, visitors, and the place where we all live and work. I urge the Aquaculture Review Board to reject applications #1205x, #1432 and #1433.

Sincerely,
Joanne Mitchell

[REDACTED]
Port Joli, NS [REDACTED]

The Aquaculture Review Board of Nova Scotia
Sent via email

Feb. 05, 2024

To : aquaculture.board@novascotia.ca

CC: PREMIER@novascotia.ca
MINDFA@novascotia.ca
Kim.maslandmla@gmail.com
Minister.Environment@novascotia.ca
Health.Minister@novascotia.ca
IEGMinister@novascotia.ca
garyburrillmla@gmail.com
rick.perkins@parl.gc.ca
DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca
Ministerofred-ministreduder@ised-isde.gc.ca
justin.trudeau@parl.gc.ca

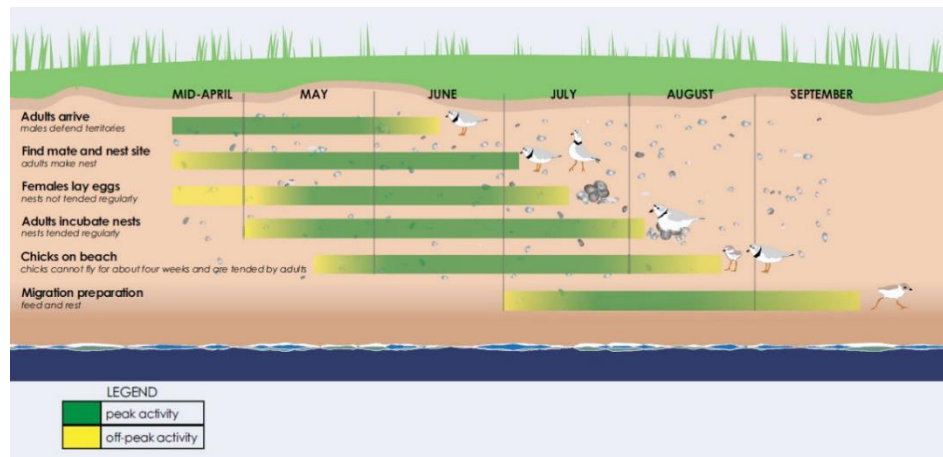
Re: The application by Kelly Cove Salmon Ltd. for a Boundary Amendment and Two New Marine Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon for AQ#1205x, AQ#1432, and AQ#1433 in Liverpool Bay.

Canada's Ocean Playground. That is our provincial motto, proudly displayed on our license plates. Nova Scotia has the most beautiful coastlines. We are currently under threat of losing that. Kelly Cove is proposing to expand and create more sites in Queens County, in areas that will interfere with and have a great impact on: the current commercial and indigenous lobster fishery, moss harvesters, real-estate, tourism, and on the Nature Reserve Coffin Island. "Large beaches, small salt marsh, protected cove, and a winter habitat for national species of special concern and provincially endangered harlequin duck" are the Ecological Values listed here: [12 Percent - Parks and Protected Areas System Plan Consultation \(novascotia.ca\)](#)

Beach Meadows Beach is also part of that protected area; home to the Piping Plover which is federally protected under the Species at Risk Act, the Migratory Birds Convention Act, and by the Canadian National Parks Act. Piping plovers are carnivores and eat mainly insects, marine worms, snails, water beetles, and crustaceans. We cannot afford to risk contaminating the habitat and breeding grounds of the Piping Plover with pharmaceuticals and chemicals (used by the open pen fish farms) polluting the waters and the food source they depend upon.

On the Nova Scotia.ca website, the Beach Meadows Beach Park overview boasts about the 1 km long beach with pristine white sand. Coincidentally, not a mention of the fish farm debris and slime that coats the beach and shoreline.

Piping plovers are migratory birds. During spring and summer in Canada, they breed along the Atlantic coast. In Nova Scotia, there are fewer than 40 breeding pairs; a decline of more than 25 percent since 2001, and according to [Bird Studies Canada](#), in Nova Scotia, piping plovers breed on less than 30 beaches. Many traditional breeding beaches have been lost due to natural and human-induced changes. [NCC: Piping plover \(natureconservancy.ca\)](#)



As a birder and nature enthusiast, I cannot conceive that we would allow the application by KCS to place additional burden on these already threatened species.

- Factor 1: Not an optimal use of our marine resources. Sailing, boating, scuba diving, surfing
- Factor 2: Deters people from buying and building along our coastline, lowers property values and tax base
- Factor 3: Obstructs use by any new/existing members of the marina
- Factor 4: Site design and location – too close to the protected areas. Unsightly
- Factor 5: Increased risk to birds, marine mammals, shell fish, eelgrass & moss
- Factor 6: Our rights to navigate the harbour and coastline will be impeded
- Factor 7: Open nets have a negative impact on wild salmon

Land based farms are in development around the world. In 2023, 1.8 million metric tonnes of salmon were slated for land based production. In Canada there were only a few. The major salmon farming companies operating in our oceans show no interest in transitioning to land based even though those same companies are operating land based farms elsewhere in the world. This tells me that government funding and support plays a major role. We have the power to make change here. This is an opportunity. “We can seize the helm, or miss the boat.” [livingoceans.ca](#)

I fail to see how increasing the open net fish farms in Liverpool Bay will benefit Queens County in any way; it can only be detrimental to all the things we hold dear. Given the unintended consequences of this method of fish farming, you must reject this current application and any future attempts to expand the open pen fish farms.

Concerned citizen,

Cindy Stafford

[REDACTED]

Queens County, NS

[REDACTED]

Active kayaker, recreational fisher, and bird watcher

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:53 pm, Feb 08, 2024

From: [Heather Cameron](#)
To: [Aquaculture Review Board](#)
Subject: Re: The application by Kelly Cove Salmon Ltd. In Liverpool Bay
Date: February 8, 2024 12:19:20 PM

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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.

Attention Nova Scotia Aquaculture Review Board

I have lived and worked in Lunenburg and Queens Counties since 1989, and my son resides in Liverpool and makes his livelihood on the ocean in the tourism industry. During that time I have seen many unfortunate changes, licensed by the Governments of the time, that have had a detrimental effect on the environment of Nova Scotia. I have never spoken up before as the process to do so is not welcoming. This time is different. This time it makes no sense to me that Kelly Cove Salmon Ltd might be allowed to expand their current operations (which should never have been allowed) unless the people of Nova Scotia and the Aquaculture Board can show there is a reason to not grant their application. They are essentially being given a green light by the current Government to proceed unless there is enough opposition to their expansion. This seems to me to be the wrong way round. Kelly Cove Salmon Ltd should have to prove, which they can't based on much research in many parts of Canada and the world, that open net fish farming is not going to have a detrimental effect on the environment. Kelly Cove Salmon Ltd should NOT be granted the boundary amendment they are requesting.

As you make your decision regarding this application I would like you to please take the following into consideration:

1. The enrichment of the water body around the cages causes excess nitrogen and phosphorous, which can result in algal blooms that are detrimental to other sea life. This will impact other species and fishing activities. Wind speed, wave height, tides, temperature and depth of the water in the proposed area need to be a big consideration.
2. The build up of sediments under the cages will smother life on the sea bed. This is especially concerning for other users in the region of the proposed development. It's unfortunate that Nova Scotia is not yet taking seriously the natural beauty we have around us and doing its utmost to protect our coastline and beaches. Dead seabeds are not what tourist want to see when they are kayaking and sailing around our coasts. When the tides are higher and we have weather systems that causes water turbulence (which is more frequent) the sediment can travel. In other parts of Nova Scotia (Bayswater) the beach, and enjoyment of it, has been significantly impacted by the open net fish farm site in the bay.
3. The transfer of diseases from cages to wild fish populations is a big problem. With salmon farming in open net pens sea lice is a particular issue. Kelly Cove Salmon Ltd must use pesticides to combat sea lice. What impact does that have on marine life, and the consumer?
4. The escape of fish that are genetically very similar from the cages and their breeding with wild fish populations of the same species results in reduced genetic diversity. This is an ongoing issue in many parts of the world and is to be avoided.

In conclusion, I am opposed to open net fish farming. I would like the Aquaculture Board to decline Kelly Cove Salmon Ltd's application to expand their current operations, and hope, that in the future the Board will reach the conclusion that open net fish farming is a high price to pay for low quality sushimi and open net fish farming around Nova Scotia's coast will be misguided history.

Regards,
 Heather Cameron

Dayspring, NS

Meteghan River, Nova Scotia, B0W 2L0 CANADA
Phone: [REDACTED] Fax: [REDACTED] Web: [REDACTED]

Gilles Theriault
[REDACTED]
Meteghan River, Nova Scotia; [REDACTED]
[REDACTED]

February 8th, 2024

Re: Kelly Cove Salmon Application for BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES and LEASES (AQ#1205x, AQ#1432, AQ#1433)

To Nova Scotia Department of Fisheries and Aquaculture,



My name is Gilles Theriault and I'm writing to you on behalf of A.F. Theriault & Son Ltd. (AFT) for which I am President. For over twenty years now, AFT and Kelly Cove Salmon (KCS) have developed a business relationship that has benefited both parties tremendously. As KCS has grown their business in Nova Scotia and Atlantic Canada, AFT has been able to grow alongside. Case in point for this is the construction of a new state-of-the-art 1,500 marine railway which we completed construction on in April 2019. Our relationship with KCS was a large contributing factor in our decision to invest into new infrastructure for our Company. KCS has always been supportive of our growth as a Company and we, in turn, the same. Furthermore, the experience and expertise we've gained over the years has expanded our clientele to other aquaculture businesses located in Atlantic Canada. Our Company is considered a leader in our region for aquaculture related work. It is important that we continue to gain experience and expertise in each of our industries to ensure sustainability in each.

Therefore, please view this letter as one of support for KCS' application for a boundary amendment and two (2) new marine finfish aquaculture licenses and leases. The proposed site in Liverpool, NS is conveniently located within 2 hours of our facility; therefore, vessels can be repaired in due time either on-site or at our shipyard. We, at AFT, are far from experts in the salmon farming (aquaculture) industry. However, we've been gaining experience and expertise in the processes and systems used by KCS to create a sustainable environment for the fish to grow and are always in awe of the ingenuity and innovation from KCS in this regard. We've witnessed first hand the efforts and improvements completed by KCS to mitigate any environmental concerns that come with open-net fish farming including reducing noise pollution so as to not disturb the local communities. They are truly committed to providing a sustainable industry and local opportunities for Nova Scotians.

KCS has always been a proponent for growth in rural coastal communities across Atlantic Canada. We've seen a decline in our region's population over the years and the current demographic needs improvement. We need to attract a younger generation to our region so we can not only sustain our communities but grow them for the benefit of everyone. KCS' commitment to this project shows a commitment to our communities which we largely need. Growing the business infrastructure in our region will benefit those directly in the industry, those directly adjacent to the industry (i.e. A.F. Theriault & Son Ltd. and others) and many not directly involved as the trickle-down effect will benefit many businesses and individuals in our region.

We firmly believe that a project of this magnitude will bring positive outcomes for many in our region and our Province. We ask that our Government show their support in the development of our region by accepting KCS' application for this license. A.F. Theriault & Son Ltd. sincerely gives its support in the matter and will gladly help in any which way we can.

Regards,



Gilles Theriault

President

A.F. Theriault & Son Ltd.



RECEIVED

By Nova Scotia Aquaculture Review Board at 11:01 pm, Feb 08, 2024

From: [Jo-Ann Grant](#)
To: [Aquaculture Review Board](#)
Subject: Proposed Expansion of Open Net Pen Fish Farm in Liverpool Bay
Date: February 8, 2024 4:18:07 PM

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

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Re: Proposed Expansion of Open Net Pen Fish Farm in Liverpool Bay

I came to Liverpool for a visit in 1984 with my husband and four children, mainly to visit the many family members who were living there. We wound up falling in love with the area, especially the beaches. I couldn't imagine a better way to spend a summer afternoon with young children than sunning, playing, and swimming at Summerville Beach and Beach Meadows, where if there were people within 30 feet, the beach was considered crowded that day. We wound up buying a house in Liverpool in 1986, packing up our Toronto home, and now five children, and making the move to Nova Scotia.

Summerville was our sunny summer afternoon beach; Beach Meadows, with its great playground, tended to be our early evening beach, and Beach Meadows became my winter beach. It was a place where I could enjoy the sound of the waves and the gulls, and find peace. It was also a favourite beach to walk with a girlfriend, climbing the rocks at the far end, and sitting for a chat on the ledge overlooking the Bay.

I raised my five children in Liverpool, and we took every opportunity to enjoy the beaches. What a wonderful way for children to grow up! Once they moved on to their adult lives, I moved to Chester to be closer to work. Still, I treasure the memories of those peaceful days on the beaches. What's truly sad is that those peaceful days on the beaches in Queens are long gone, thanks to Cooke and fish farms.

Not only do I oppose any expansion of fish farms in Liverpool Bay, I believe they should be declared a fishery so they are regulated by DFO, and removed as is in process in British Columbia. We all know what science has told us about use of pesticides and antibiotics, sea lice, escapees mating with wild salmon, the threat to our wild salmon that continues to grow, the harm to the lobster fishery, to name just a few issues. We also know what people are experiencing with respect to the noise from these pens, experiencing skin issues if they go in the water, and the garbage and sludge washing up on our beaches.

Cooke disputes that these harms are taking place; however, Cooke also has been known to go ahead and expand its fisheries without waiting for approval, so what else would we expect them to say?. I don't know of anyone other than Cooke and their employees, who actually want these open net pen fisheries in Nova Scotia's water..We elect representatives to represent us. But they set up an "independent review board" so now they can, and do, say "It's not my fault. I don't want the open net pen fishery either, but, you know, the independent review board said it's okay so it's out of my hands." That's just not good enough..

Nova Scotians once took pride in being known as "Canada's Ocean Playground"; now Nova Scotia's playground is littered and being poisoned, commercialized at the expense of Nova Scotians and those that visit here, for the benefit and enrichment of the few who simply don't give a damn. Follow the lead of Sustainable Blue: build the fisheries on land.

Jo-Ann Grant

[REDACTED]

Chester, NS

[REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:03 pm, Feb 08, 2024

February 8, 2024

Brooklyn, 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

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 strongly oppose the application by Kelly Cove Salmon Ltd. for a boundary amendment and two new marine finfish aquaculture licenses and leases in Liverpool Bay, Queens County. Specifically, I urge you to reject AQ#1205x, AQ#1432, and AQ#1433, which seek to cultivate Atlantic Salmon (*Salmo salar*) in this area.

As a concerned citizen and someone with a vested interest in sustainable marine resource management and an interest in a lease for regenerative ocean farming. I implore you to carefully consider the following points before making any decisions regarding this expansion:

1. **Optimum Use of Marine Resources:** The proposed expansion does not represent the optimum use of marine resources, especially considering potential conflicts with other activities such as fishing, regenerative ocean farming, or renewable energy projects.
2. **Contribution to Community and Provincial Economic Development:** While aquaculture can contribute to economic development, it must be done sustainably and without jeopardizing the livelihoods of other stakeholders, including those interested in regenerative ocean farming in Liverpool Bay.
3. **Impact on Fishery Activities:** The expansion of Kelly Cove Salmon Ltd.'s operations could negatively impact existing fishery activities in Liverpool Bay, potentially disrupting traditional and culturally significant fishing practices and local livelihoods. As a counterpoint, regenerative ocean farming bolsters fisheries.
4. **Oceanographic and Biophysical Characteristics:** It is not enough to consider the unique oceanographic and biophysical characteristics of Liverpool Bay from the perspective of present data and PAST events. Before approving aquacultural operations, please consider forecast models for sea level, temperature, chemistry, and weather patterns, as these factors can significantly influence the success or failure of such operations and the marine environment's overall health.
5. **Other Users of Public Waters:** The expansion of Kelly Cove Salmon Ltd.'s operations does not meet the needs and interests of other users of public waters in Liverpool Bay, including land owners, recreational boaters, fishermen, and ocean stewards.

6. Public Right of Navigation: Any expansion of aquacultural operations must not infringe upon the public's right of navigation or access to public waters in Liverpool Bay. Whether the proposed expansion or Kelly Cove Salmon Ltd. acknowledges and respects this right is unclear.
7. Sustainability of Wild Salmon: The perspective that there aren't enough wild salmon to impact is a short-sighted obfuscation. The analysis must include the impact of these activities on salmon populations to be restored. It is essential to maximize the probability of success for wild species and ensure that aquacultural operations do not exacerbate existing threats or generate new ones.
8. Existing Aquaculture Sites: Before approving the expansion of Kelly Cove Salmon Ltd.'s operations, it is due diligence to provide transparent reporting about the productivity of other aquaculture sites in Liverpool Bay in a format for review against global benchmarks. This data will clarify whether this is a safe and justifiable expansion.

In conclusion, I urge you to reject AQ#1205x, AQ#1432, and AQ#1433 and prioritize transparent and sustainable management practices that promote the long-term health and viability of Liverpool Bay's marine resources, such as sub-surface regenerative ocean farming for select shellfish and marine algae. Thank you for considering my concerns.

Regards,

Joseph Iuliucci

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:07 pm, Feb 08, 2024

February 8, 2024

[REDACTED]
Chester, Nova Scotia
[REDACTED]
[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board

60 Research Drive
Bible Hill, NS, B6L 2R2
E-mail: 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 strongly oppose KELLY COVE SALMON LTD.'s application for a boundary amendment and two new marine finfish aquaculture licenses and leases in Liverpool Bay, Queens County, or anywhere else. As a native of Liverpool with deep ties to the community and a vested interest in its future, I am deeply concerned about the environmental and social ramifications of open-pen fish farms. Scientific evidence overwhelmingly highlights the detrimental effects of finfish aquaculture on marine ecosystems, including habitat destruction, pollution, and genetic contamination of wild populations. Moreover, the visual impact on our pristine beaches and the potential disruption of other recreational activities are significant concerns. The outdated data referenced in this application fails to account for current environmental challenges, such as increased storm activity and the vulnerability of our region to flooding. Furthermore, the threat posed to wild salmon populations, already at risk in Nova Scotia, cannot be understated. The lack of transparency and accountability in reporting sea lice counts and escaped farmed fish further compounds these risks. Instead of expanding fish farms, efforts should be focused on mitigating existing environmental impacts and promoting sustainable alternatives. I urge the rejection of these licenses and leases to safeguard our ecosystem and preserve the beauty and integrity of our coastal communities.

Addressing the factors to be considered in Section 3 of the Aquaculture License and Lease Regulations:

- a) Regarding the optimum use of marine resources, finfish aquaculture, while often seen as a solution to declining wild fish populations, poses significant environmental concerns. Firstly, it can lead to habitat destruction and pollution from excess feed, antibiotics, and waste. This disrupts the delicate balance of marine ecosystems, affecting biodiversity and the livelihoods of coastal communities dependent on healthy oceans. Additionally, the reliance on wild fish for feed exacerbates overfishing and puts further pressure on already depleted fish stocks. Moreover, escapes of farmed fish can introduce non-native species, impacting local biodiversity and genetic integrity. Thus, while finfish aquaculture may address some challenges, its negative impacts on marine resources outweigh the benefits, highlighting the need for more sustainable alternatives.
- b) If we are to consider the contribution of the proposed license to the community, it would be an eyesore on the unmatched beauty of our beaches. People live in and visit our region because of its natural charm. Swimming in the waters in the region of a fish farm is repulsive and surely speaks to the priorities of the powers that be. The people do not want fish farms. The negative impacts they would have would far exceed any potential economic benefits, any of which only serving the few.
- c) Generally speaking, this type of aquaculture has a negative impact on other fishery activities. As mentioned in a previous point, escapes of farmed fish can interbreed with wild populations. This dilutes genetic diversity and alters ecosystems. This reduces the availability of wild-caught fish, further straining already stressed fisheries. In point C of section 3 of the Aquaculture License and Lease Regulations, it refers to “public water”. I think this term needs to resonate with the readers: these waters are public. They are for the people and other plant and animal species. They should not be defiled to make money for a corporation.
- d) The data referenced regarding this license application is shockingly old: over 30 years old. The world has seen a lot of changes due to an increase in storm activity in this time, and those storms are only going to get worse. The town of Liverpool already floods regularly. The slurry and dead fish washing up the streets and into the water systems would not only be disgusting, but would be environmentally damaging.
- e) The fish farm impact on the quality of our beaches for us humans has been mentioned above. There are other users of the waters as well. Experts agree that it is essential to restrict access to fish farms by sea birds. The existence of these fisheries will impact the population of species like the shag and the cormorant, which exist in this area. Birds and other animals become dependent on the food source, and if something goes wrong in the farms, it will not only affect the surrounding waters, but will have a knock-on effect because of this.
- f) The factor of the public right of navigation is a no-brainer to me. Can I kayak straight through the nets? I am not a lawyer, but it appears my public right of navigation would be violated.
- g) Regarding the sustainability of wild salmon: Kilian Stehfest, SeaChoice representative from David Suzuki Foundation, advises “that shoppers avoid purchasing all Canadian open net-pen farmed salmon, regardless of provenance due to the risk to wild salmon

populations on both coasts.” And according to Dr. Jeffrey Hutchings, Killam Memorial Chair in Fish, Fisheries and Oceans with Dalhousie University, **“Nova Scotia has by far and away the most endangered wild Atlantic salmon populations in Canada,”** and for our rivers, **“even a few escaped farmed fish, especially when they breed with wild salmon, can have a detrimental effect on the natural populations.”** Nova Scotia has a higher rating than other fishing provinces for sustainability, but according to Simon Ryder-Burbidge, SeaChoice representative from the Ecology Action Centre, “We are the only province in Canada that doesn’t publicly report sea lice counts, and river monitoring data for escaped farmed fish is almost non-existent relative to New Brunswick and Newfoundland. The scoring system seems to incentivize a data-poor environment” (davidsuzuki.org). This is terrifying to me that we would even consider awarding a license that will exacerbate this fragile situation.

- h) Finally, there are already pens in the area. The energy put into stopping more should be put into getting rid of what is already there.

I sincerely hope the leases and licenses will not be awarded and the boundary amendment will be rejected. The ecosystem depends on it, and the science supports that. The eyesore it will create will have psychological effects on the local population, already feeling that big business is overrunning their home. As a (hopefully near) future resident of the area and someone who has deep roots there and has made an investment in the region, the prospect of having this type of fishery off the coast would make me reconsider my plans. As the lawn signs all say: Say NO to open-pen fish farms.

Sincerely,

Rebecca McCarthy



Juvenile sockeye salmon with sea lice. As few as two or three sea lice can kill these smolts. For Atlantic salmon, with larger smolts, as few as eight sea lice can kill them. Photo Alexandra Morton

(Atlantic Salmon Federation)

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:12 pm, Feb 08, 2024

February 08, 2024

[REDACTED]

Brooklyn, NS [REDACTED]

E-mail: [REDACTED]

Phone: [REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

E-mail: 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 Sirs / Madams,

I am asking that you REJECT the application, as the sites proposed do not make the optimum use of marine resources in the areas where they are proposed. Liverpool and Brooklyn have a thriving boating community and a growing population base attracted primarily by an excellent harbour and first class near shore boating recreation opportunities.

I, myself have recently moved to the Brooklyn area, and plan to retire there. As a long-time South Shore boater, I was attracted by the proximity of amazing beaches (in particular, Beach Meadows, which is now in danger of being fouled by more aquaculture waste from an expanded cultivation operation) and the excellent fishing on either side of Liverpool Bay. I found the area off Fralic Cove and the shore off Western Head very productive. The two new proposed leases will make it impossible to fish or cruise in the areas where these are located.

Also worthy of mention is the amount of new debris from the expanded aquaculture operations that will be released into the Bay. One only needs to take walk along the beach on Coffin Island so see just much how garbage composed of broken and damaged gear from the fish pens has washed up there. The boundary amendment and the new leases foul the foreshore around the Bay.

With the Brooklyn marina, a largely volunteer group has shown the dedication that is inspired by the attraction of the (mostly) pristine Bay. The Bay really is a recreation gem and should not be given over to industrial aquaculture. Doing so will hamper the long-term growth potential of the area, and reduce property values, upon which a large proportion of tax revenue relies.

From my perspective, which only addresses a few of the concerns that the board should consider with this application, I strongly urge that the board REJECT this application. It would be most refreshing if the board could find the courage to weight the concerns of local constituency over the profit motives of a corporation not invested in our community.

Regards,

Detlef Heiss

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:14 pm, Feb 08, 2024

From: [Gary and Sue Clark](#)
To: [Aquaculture Review Board](#)
Subject: Strong Opposition to the proposed new and expansion of Fish Farms in Liverpool Bay
Date: February 8, 2024 7:38:08 PM

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Gary Clark
[REDACTED]

Port Mouton, Nova Scotia
[REDACTED]

Dear Clerk of the Nova Scotia Aquaculture Review Board;

I am writing to express my deep concern and opposition to the proposed two new open net-pen fish farm sites and one expanded site in Liverpool Bay. As a resident and advocate for environmental conservation, I feel compelled to voice my objections to this potentially harmful project.

First and foremost, I am deeply troubled by the environmental impact that large-scale fish farming operations could have on Liverpool Bay and its surrounding ecosystems and beaches that support local tourism. Research has consistently shown that fish farms discharge significant amounts of waste, excess feed, and chemical pollutants into the water, leading to water pollution, habitat degradation, and the proliferation of harmful algal blooms. Liverpool Bay is a critical habitat for numerous marine species, including seabirds, lobsters and marine mammals. The introduction and expansion of fish farms poses a direct threat to the health and integrity of this sensitive ecosystem, potentially leading to irreversible damage and loss of biodiversity.

Furthermore, the expansion and establishment of salmon and trout fish farms in Liverpool Bay will have serious implications for the local lobster fishing industry and the communities that depend on these waters for their livelihoods. Small-scale fishers have been sustainably harvesting seafood from these waters for generations, contributing to the cultural heritage and economic vitality of the region. The proliferation of industrial aquaculture operations could undermine the viability of these small-scale enterprises, leading to job losses, economic hardship, and social dislocation within these communities.

In light of these concerns, I urge you to reconsider plans for the expansion of salmon fish farms in Liverpool Bay and instead prioritize sustainable alternatives that promote environmental stewardship, community well-being, and long-term resilience. This may include investing in habitat restoration projects, supporting responsible fisheries management practices, and promoting local, low-impact seafood production methods that minimize environmental harm and maximize economic and social benefits for all stakeholders.

Thank you for considering my perspective on this critical issue. I implore you to take decisive action to protect Liverpool Bay and its precious marine resources for current and future

generations.

Sincerely,
Gary Clark

Sent from my mobile device

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:20 am, Feb 09, 2024

From: [Andrew MacDougall](#)
To: [Aquaculture Review Board](#)
Subject: Liverpool Bay
Date: February 8, 2024 7:54:17 PM

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Hello,

I am writing to voice my opinion on the proposed expansion of the fish farm in Liverpool Bay.

The ecosystem of Liverpool Bay is important for Queens County residents. It should not be exploited any further by expanding the fish farm.

With stronger storms these days; spills and breaches will happen. Local wildlife will suffer.

Yours,

-Andrew MacDougall

[REDACTED]
riversdale, ns

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:49 am, Feb 09, 2024

**NEWFOUNDLAND AND LABRADOR
AQUACULTURE INDUSTRY ASSOCIATION**

Feb. 9, 2024

Re: Application from Kelly Cove Salmon

Dear Members of the Review Board,

Thank you for allowing the Newfoundland and Labrador Aquaculture Industry Association (NAIA) to submit comments under the Nova Scotia Aquaculture Review Board process, with respect to the application from Kelly Cove Salmon for a boundary amendment and two new salmonid finfish licenses for Liverpool Bay.


NAIA represents 140-plus members, engaged across all facets of seafood farming from egg to plate, including members based in the province, the Maritimes, across Canada and around the world. Our shellfish and finfish farming sectors continue to provide critical food security, while greatly reducing the carbon footprint for protein production, and dramatically increasing economic opportunities in rural, coastal communities. In 2022, the Canadian Salmon farming sector achieved 115, 818 MT of production, resulting in \$3.7 billion CAD in economic activity. Over 11,000 Canadians are employed by the sector. Atlantic Canada is – and will continue – playing a large role in that positive development.

Our members are committed to the continuous improvement of animal husbandry, biosecurity, environmental management, and sustainable farming practices, from egg to plate. Kelly Cove Salmon/Cooke Aquaculture have displayed the utmost adherence to the principles of sustainability, stewardship, and transparency in their operations throughout Atlantic Canada and around the world.

The salmon farming sector, as proven by every credible metric available, continues to be far and away the most sustainable method of animal protein production in the world, greatly limiting carbon emissions, utilizing far less water and energy resources in providing food for a growing world.

As such, NAIA and its members fully support the application as presented by Kelly Cove Salmon. We believe this amendment and expansion proposal will allow for the continued sustainable growth and development of the sector in Nova Scotia and support continued operations across the region. The sensible expansion of farming operations is good for communities, and good for the environment. We look forward to continuing positive development in Nova Scotia and across the Atlantic Region.

Best regards,


Jamie Baker, NAIA St. John's, NL, 
Telephone: 

January 22, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 4:30 pm, Feb 11, 2024

William Daniels
[REDACTED]

Martins Brook, NS
[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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 want the application by Kelly Cove Salmon Ltd. to expand its operations in the Liverpool Bay area to be **denied** by the Aquaculture Review Board.

I do not believe that this application is the optimum use of marine resources and that it will harm or destroy marine resources of greater value to Nova Scotia and the community of Liverpool. This area of the province relies heavily on tourism. Tourism in Nova Scotia is dependent on the natural ocean landscape. Liverpool's economy is largely dependent on tourism. The economic boost the fish farm brings to the area will not outweigh the hit to current and potential future tourism businesses.

The advancement and expansion of open pen net aquaculture in Liverpool will also hasten the extinction of the remnant Atlantic Salmon population in the Medway River; a formerly highly productive salmon and popular angling river. It will also have wide-ranging impacts on the overall ecosystem of Liverpool Bay which will be difficult or impossible to measure and track.

In summary, I do not believe that the expansion of Kelly Cove Salmon Ltd. operations in Liverpool Bay favors the economic, social, and environmental well-being of Nova Scotia and Nova Scotians and that this application should be turned down because of it.

Regards,
William Daniels

From: [Olis Colp](#)
 To: [Aquaculture Review Board](#)
 Cc: [Premier](#); [Public Works Minister](#); [Minister DFA](#); [Minister, Env](#)
 Subject: Submission to Nova Scotia Aquaculture Review Board
 Date: February 9, 2024 2:22:29 PM

RECEIVED

By Nova Scotia Aquaculture Review Board at 4:36 pm, Feb 11, 2024

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February 9, 2024
 Olis Colp

[REDACTED]
 Brooklyn, Nova Scotia
 [REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
 60 Research Drive
 Bible Hill, NS B6L 2R2
 E-mail: 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 – AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY

My name is Olis Colp and I have resided in Beach Meadows since my retirement in 2017. My family has resided in Beach Meadows since the mid-1700s. I have been lucky to spend summer weeks here every year of my life.

The thought of this fish farm expansion in Liverpool Bay troubles me significantly. Not only me personally but for the community at large.

I understand that we must present at least one point from the eight to the ARB Board, in order to have our voices heard. It is the following point I wish to address: **e) The other users of the public waters surrounding the proposed aquaculture operation.**

This aspect is tourism. Tourism is a major economic factor for the South Shore of Nova Scotia. It is recognized and promoted as such by the Government of Nova Scotia. Tourism Nova Scotia spends significant budget advertising the aesthetics of Nova Scotia including its pristine coastline.

Activities enjoyed in the waters and land surrounding the bay include: paddle boarding, kayaking, swimming, kitesurfing, boating, and family beach days. These activities bring visitors and money to the area.

An increase in size of the fish farm will harm the aesthetics of the area. To put it bluntly, people find fish farms ugly. Tourists do not come to Beach Meadows to view ugly fish farms. They come for pristine coastal views and a beautiful fine sand beach. I have been lucky to have had a number of visitors in my retirement. Without exception they have all commented on the ugliness of the fish farm. They have wanted to avoid areas that overlook fish farms in future outings.

I hope you will consider this petition.

Regards,
 Olis Colp

Cc: Honourable Premier Tim Houston, PREMIER@novascotia.ca
 Honourable Minister Kim Masland, publicworksmminister@novascotia.ca
 Honourable Minister Kent Smith, MTNDFA@novascotia.ca
 Honourable Minister Tim Harman, minister Environment@novascotia.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 4:41 pm, Feb 11, 2024

Filed by email to aquaculture.board@novascotia.ca

February 9, 2024.

Nova Scotia Aquaculture Review Board
60 Research Drive,
Bible Hill, N.S. B6L 2R2

Dear Members of the Board:

Re: Applications 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.

Please accept this letter as my submission of written comments in all three of the matters noted above pursuant to section 20 of the *Aquaculture License and Lease Regulations* and section 12 of this Board's *Rules of Procedure Respecting Adjudicative Hearings*.

My full name and address are as given below. For purposes of full disclosure I note that I am a member of the Nova Bar and have been since 1984.

Please be advised that I am opposed to the granting of all of the above noted applications.

At the outset I wish to point out that I am not affiliated with the applicant or any intervenors in this proceeding. I currently live in West Berlin, a few hundred yards from the boundary with Eagle Head where I was born and raised.

My ancestors settled Eagle Head in the eighteenth century and both my mother's and my father's family have lived there ever since. My grandfather and great grandfather were lighthouse keepers on Coffin Island. They fished around the island as did many of my neighbours and their children until the introduction of the fish farm. While I am deeply invested in the area emotionally, I am also invested from an environmental perspective and from an economic perspective.

Section 3 of the *Aquaculture Licensing and Lease Regulations* states:

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;
- (b) the contribution of the proposed operation to community and Provincial economic development;
- (c) fishery activities in the public waters surrounding the proposed aquacultural operation;
- (d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation;
- (e) the other users of the public waters surrounding the proposed aquacultural operation;
- (f) the public right of navigation;

- (g) the sustainability of wild salmon;
- (h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquacultural operation;

This list is very broadly worded and while it guides any decision by providing for factors that must be considered, it does not purport to be nor is it all inclusive.

It is a basic tenet of our legal system that they who assert must prove. In this case the applicant must prove beyond a balance of probabilities not only that it qualifies for the boundary amendment and the two new licenses that it has applied for, but that the relief that they seek ought to be granted.

With respect to the boundary amendment for the lease off of Coffin Island, the application is framed as if the applicant seeks to expand its existing operation. There is no mention in the application that the current operation exists partially outside the current lease parameters. This is not just an application for expansion, this is an application to justify unlawful operations after the fact.

We are told by the documents filed by the Province in this matter that the Applicant was informed of their unlawful operations in 2016. They continue to operate unlawfully with the collusion of the Province to this day.

The reasons for the Province's failure to enforce the law are unknown but it shows a disregard for the legislation and for the jurisdiction of this Board which is the only body that can permit lease boundary amendments.

I am not privy to how long prior to 2016 the Applicant flouted the terms of its license and operated beyond its parameters. The applicant already made an unlicensed expansion almost a decade ago. It merely now asks this board to sanction its illegal use of the waters off Coffin Island.

With all due respect to the Province, I cannot help but note that much of the information filed by it, and in particular Exhibits 4 and 7, are written in a manner and tone inconsistent with the objectivity that I would expect from such documents.

By ignoring the applicable law and allowing the applicant to continue with its operation that exceeded the parameters of its lease at Coffin Island, the Province and in particular the Department of Fisheries and Aquaculture are no longer disinterested in the outcome of this hearing. Exhibits 4 and 7 should be read with this in mind.

It is with the foregoing in mind that I make the following comments.

The southwest counties of Nova Scotia (Annapolis, Digby, Yarmouth, Shelburne and Queens Counties) comprise the Southwest Nova Biosphere Reserve. It was designated as such by UNESCO following an application by Canada. As stated in the UNESCO website "Biosphere reserves include terrestrial, marine and coastal ecosystems. Each site promotes solutions reconciling the conservation of biodiversity with its sustainable use."¹

Further, UNESCO says in its website:

¹ <https://www.unesco.org/en/mab/wnbr/about>

Biodiversity is the living fabric of our planet. It underpins human wellbeing in the present and in the future, and its rapid decline threatens nature and people alike. It is vital to transform people's roles, actions and relationships with biodiversity, to halt and reverse its decline.

...

Conserving the diversity of life on Earth and ocean health is critical to global human welfare, yet essential resources are at risk from the direct results of unsustainable practices. Sustainable development cannot be achieved by technological solutions, political regulation or financial instruments alone. We need to change the way we think and act.

One does not need to be a strict adherent of the UNESCO philosophy to see the logic in these statements, one needs only to look at recent history. The destruction of the environment in the name of economic development is front and center in the news today and we see the results in climate change, reduced human health, crop yield reductions, deforestation.

I am sure by now that I have earned a cynical eyeroll from those who scoff at the idea that a small, localized project such as the one under consideration can have a dramatic effect on anything from a global perspective, least of all the planet's environment. But, like ants each carrying one grain of sand, individual projects such as the fish farms under consideration can have a combined effect that can significantly affect the entire planet.

Returning to the factors that section 3 of the Regulations say must be considered, none of them favour the granting of any of these applications.

- (a) the optimum use of marine resources – as quoted from UNESCO, “we need to change the way we think and act.” The idea that in the name of economic development the environment must give way is an out of date notion and it is economically not supportable. Simply stated, industrial development is not always best and I would argue that these days it is not best if it comes at the expense of the environment.
- (b) the contribution of the proposed operation to community and Provincial economic development; - The contribution of the proposed operations will make a minimal contribution to both the local economy the Provincial economy. We delude ourselves if we believe that these operations are being developed for the good of Nova Scotia. Any benefit derived will be at the expense of other industries such as inshore fishing and tourism. While expansion of the fish farm may positively affect the applicant's economic development, there is no credible evidence that there will be any significant positive contribution to either local or provincial economic development.
- (c) fishery activities in the public waters surrounding the proposed aquacultural operation; - inshore fishing and fish farming are not compatible. The farm as it exists now does so at the cost of fishers who have been excluded from lobster grounds that have been fished for centuries. Any expansion will exacerbate that situation.
- (d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation; - there is no question that fish farming releases toxins.

There is disagreement only over how much toxin is released and how far the effect is felt. We must stop looking at these questions as if they were merely mathematical formulas and assuming that any amount of toxins are safe. The fact that toxins of any kind are released should be enough to determine these applications in the negative. If fish farming cannot be carried on safely, then it ought not to be carried on.

- (e) the other users of the public waters surrounding the proposed aquacultural operation; - the current fish farm negatively affects commercial fishermen, tourists, tourism facility operators, local recreational boaters and the local population who use or would use the waters around Coffin Island. Fish farming excludes anyone else from using the waters in question. The areas that we are dealing with are by their nature already heavily used because of their location and any expansion of the fish farms will merely exacerbate the effect of excluding other users.
- (f) the public right of navigation; - please see (e) above
- (g) the sustainability of wild salmon; - a question perhaps more for scientists but it is inconceivable that fish farming has no effect on wild salmon. We must ask ourselves whether a few dollars in someone else's pocket is worth killing local salmon, which would detrimentally affect our local biosphere as well as tourism and the sport fishing industry.
- (h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquacultural operation; - not applicable

I argue that these applications are premised on outdated concepts that industrial development and expansion are always good and collateral harm, especially local collateral harm, no matter how devastating, is acceptable. We must begin to look at small scale inshore fishing and tourism as the true industries that they are and recognise that they benefit the local economy directly and significantly. We must stop thinking that big development by multi national corporations is always better.

Practices that harm the environment including practices that harm wildlife, including fish, are completely unacceptable.

Thank you for your attention to this.

Peter Leslie

[REDACTED]

[REDACTED]

West Berlin, Nova Scotia

[REDACTED]

Mailing:

[REDACTED],

Port Medway, N.S.

[REDACTED]



RECEIVED

By Nova Scotia Aquaculture Review Board at 4:50 pm, Feb 11, 2024

Twin Bays Coalition

Pleasantville, NS

9 February 2024

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

E-mail: Aquaculture.Board@novascotia.ca

TWIN BAYS COALITION – PUBLIC INPUT

Reference: 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.

Please accept this submission from the Twin Bays Coalition as public, written input to the Aquaculture Review Board (ARB) Hearing on the three applications from Kelly Cove Salmon (KCS) for new and expanded operations in Liverpool Bay and environs.

The Twin Bays Coalition of St. Margaret's and Mahone Bay is dedicated to preserving and restoring the health of our marine ecosystems and coastal communities. We have a vision for a vibrant, resilient, **ecologically sustainable** and regenerative ocean economy that supports coastal livelihoods without degrading our home waters or putting existing jobs at risk. With direct and substantial experience regarding the impacts of an open net pen finfish site located approximately one kilometre up current from Bayswater Beach Provincial Park, Twin Bays Coalition is qualified to comment on these applications.

Our input concerns:

- a. the optimum use of marine resources;
- b. the contribution of the proposed operation to community and provincial economic development; and,
- c. the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture location.

It is our opinion that existing legislation and regulations are not adequate to properly and fairly, deal with a development of this scale. The lawmakers probably never envisioned anything more than single site applications spread out over our huge coastline. We will use this theme throughout our arguments against these applications.

INTRODUCTION

Twin Bays Coalition was the key organizer in the successful effort to stop CERMAQ Canada from establishing open net pen operations along our coastline. The ARB has made it abundantly clear that public opinion is not a deciding factor in these Hearings. Nonetheless, we wish to remind the ARB and Government that public opinion is important and that alternatives to open net pens, as a means of “saving” our coastal communities, are available and preferred by many.

To this end, Twin Bays Coalition has participated in and/or monitored all the ARB Hearings to date. Observations have been made regarding intervenor decisions, the admissibility of evidence and the tolerance of partnerships between Counsel for the proponent and Counsel for the Province. Along with the Healthy Bays Network (HBN) and other HBN organizations, Twin Bays Coalition has repeatedly challenged and cooperatively engaged with all levels of Government on open net pen issues well beyond the purview of the ARB.

Suffice to say that through our experience, it has become clear the Government of Premier Houston has directed expansion of open net pen aquaculture as both desirable and necessary for the future of Nova Scotia. It is our view that because of this, the ARB has been placed in an untenable position as an impartial tribunal. Our analysis of existing legislation, participation in and monitoring of ARB Hearings, supports our view that the process is neither comprehensive nor fair.

One example lies in the eight factors that drive ARB deliberations. Despite repeated requests to Government, the eight factors remain undefined. Without firm Government guidance, it is therefore left up to the ARB to define what each factor means and to stay consistent from Hearing to Hearing. As the ARB decides on matters of admissibility under each factor, there are no definitions to ensure a balanced, fair and consistent outcome. This increases likelihood of appeal on the ARB decision. It would be far more efficient to have comprehensive legislation that enshrines a fair hearing for all parties rather than increasing the prospects of an appeal having to be heard in court.

Absent proper definitions under legislation, our input to the ARB is therefore based on the considerations developed by East Coast Environmental Law (ECELAW). They may be found on Page 5 of the [Summary Series, Volume 15, Winter 2021 titled: Aquaculture and Public Engagement in Nova Scotia](#). Twin Bays Coalition finds that these considerations reflect an adequate balance between the information the proponent and Government want the ARB to believe and the lived experiences of residents which we need the ARB to believe.

The remainder of this letter is formatted with the factor in capital letters followed by the ECELAW considerations that have been used to formulate the input under each factor.

ANALYSIS OF FACTORS

A. THE OPTIMUM USE OF MARINE RESOURCES

ECELAW Considerations: *“Consider the full picture of the operation, it’s overall effects, impacts and benefits, and how the proposed operation is or is not the best use of marine resources.”*

Wherever there is development, nature and existing ways of life are disrupted. Over time, new patterns of life emerge and a new normal is established. In the sea, new open net pens displace fishers who move to other areas or stop fishing. Sea life is displaced – sometimes being followed by the

displaced fishers. Dispersion and assimilation of new waste products impacts different areas of the water column and seabed.

In Nova Scotia, net pens in our shallow waters require aeration equipment that creates harmful and continuous noise that seems unregulated. Jurisdictional uncertainty and finger pointing occurs between all levels of Government. When these operations are in close proximity to home and land owners, they create significant financial, health and social problems.

In total, these proposed operations will create huge changes to the environment, ecosystems and the existing fisheries in Liverpool Bay and environs. An over 300 percent increase over existing production in an area of two kilometres radius, situated in shallow waters, near a public beach, on proven fishing grounds, and at the entrance to a port, cannot be undertaken without careful consideration and adequate study. In many cases, the degree of care that needs to be taken in these decisions far exceeds the legislation in place to purportedly guarantee that level of care.

Using existing Government guidance on modeling and estimating impacts is not sufficient in this case. The proposed sites are very close together. Modern tools are now available that were not yet developed when the initial application was prepared almost ten years ago. These tools will model cumulative impacts more accurately. In view of the analytical advances that have occurred, the ARB would be wise to direct use of these modern tools. Based on our experience at Bayswater Beach Provincial Park, reliance on only the required depositional models depicting conditions within the three lease areas would be very reckless on the part of the ARB.

The optimum use of this very small geographic area has already been achieved. It is at the entrance to a coastal port with commercial and recreational marine traffic. Most of the commercial fishers we met, transit that geographic area to reach their preferred fishing grounds. Several of them set lobster traps within the boundaries of the proposed net pens. A large, public beach is nearby. Homes dot the coastline – homes that will be negatively impacted in unanticipated ways. In essence, an equilibrium exists that now faces significant disruption by this proposed development. It is no wonder that there was a large list of prospective intervenors who wished to argue against this proposed development.

There are, of course, benefits to be found. New, direct jobs will be created. How many full time and how many part time – KCS is not specific. The ARB must obtain these details along with assessments of how many displaced fishers may decide to leave the fishery. These are important factors that provide a more reliable basis for decision on this one, small aspect.

Spin off economic benefits will occur. The ARB must not lose sight that parent company Cooke Aquaculture is a very large, well established, vertically integrated, private company. They have significant open net pen infrastructure already in place and while they pledge to “buy local”, if they already possess that capability, it will likely come from New Brunswick, not Liverpool.

The Province will collect licence and lease payments. Given the unfettered use of the public waters and sea bed granted to the company – these sums are trivial. Benefits to the Provincial coffers from economic activity associated with these operations and production will certainly occur, however, the proponent provides only vague assurances, little quantification, and no substantiation. More precise and binding commitments must be demanded from the proponent before a decision is made.

There are already significant uses of the marine resources within the proposed lease areas and beyond. All will be affected, many negatively, should these applications be approved. The ARB must decide whether the upheaval to be imposed, is justified.

Twin Bays Coalition finds that modern assessment tools are not being used in this evaluation process and there is an over reliance on existing data. Therefore, not enough up to date information is available for the ARB to make a good, fair and informed decision on this factor. It is our opinion that optimal use of this area has already been achieved and these applications should be denied.

B. CONTRIBUTION OF THE PROPOSED OPERATION TO COMMUNITY AND PROVINCIAL ECONOMIC DEVELOPMENT

ECELAW Considerations: *“Consider production information for cultivated species, infrastructure, services and suppliers for the operation, employment details and contributions or adverse impacts to the local and provincial economy.”*

Being a large, privately owned, vertically integrated company, Cooke Aquaculture provides very little public visibility into the operations of KCS. Locals know that New Brunswick registered trucks are used to bring in fish to stock the existing pens. All the Cooke Aquaculture branded vehicles we have seen were licenced in New Brunswick as well. Nets are cleaned and repaired in New Brunswick.

The ARB must seek details from the proponent rather than accept vague assurances of economic benefit to Liverpool and the Province. Will any hires be trained for full time positions or will people with the necessary skill sets be brought in from elsewhere? How will any influx of new workers and their families affect the local housing situation? Again, if Cooke Aquaculture already possesses a capability, it will likely come from New Brunswick, not Liverpool. Therefore, more precise and binding commitments must be obtained from the proponent and a local economic impact assessment must be completed before a decision of this magnitude is made.

The ARB must also consider negative impacts on the recreational fishery which is a pillar of planned economic development in the region. The danger to the remaining salmon populations should not be downplayed.

Again, the level of economic detail needed to inform such a monumental development in public waters is simply not present. Based on the vague assertions and assurances provided by the proponent, Twin Bays Coalition remains unconvinced of the economic merit of these applications. In our opinion, under this factor, these applications should be denied.

C. THE NUMBER AND PRODUCTIVITY OF OTHER AQUACULTURE SITES IN THE PUBLIC WATERS SURROUNDING THE PROPOSED AQUACULTURE LOCATION

ECELAW Considerations: *“Consider cumulative impacts that may result given other known or proposed aquaculture sites in the area and interactions with other aquaculture operations. Consider mitigation measures proposed by the applicant.”*

Introducing 1.8 million fish into a very small marine area is a questionable proposition. Especially given the lax methods, standards and stove piped approach demanded by the Aquaculture Activities Regulations (AAR). Cumulative impacts must quantitatively account for not only the proposed net pens but also land based sources of marine pollution – both existing and new. Significant increases

in sea bottom deposition near the pens and dispersion over several kilometres from the sites will occur. Debris from net cleaning will increase. The noise from feeders and aeration equipment will be amplified and more wildlife will be attracted to scavenge in the area.

These factors can not be considered in isolation, on a net pen by net pen basis. The overall impact of the sea borne waste can be effectively modeled to provide a coherent assessment of its effect on proposed lease areas and environs. Further, not enough attention is being paid to noise concerns, primarily because the noise sources are afloat and local noise control By Laws are not enforced. This is a major problem for nearby residents. Twin Bays Coalition have heard from residents in our area who experience mental stress, physical health problems and a significant decline in the quiet enjoyment of their coastal properties. Acoustic modeling is not called for under current regulations but in this case, it must be done given the scope of the proposed operations and proximity to shore.

This is a major industrial operation being proposed. Even the Department of Fisheries and Oceans (DFO) have expressed a measure of concern about the cumulative impacts of these proposed net pens¹. This concern is noteworthy as the DFO standard for concern is a population level impact on fish or fish habitat. It is also noteworthy because DFO was restricted to available data only – and some of that was provided by the proponent. Indeed, this industry is pretty much self-regulated, particularly on the issue of fish escapes from the net pens.

These considerations underline the need for more than the dated, lease specific, depositional modeling and fish escape statistics offered up by the proponent as justification for the lack of harm they claim this development will impose on the Liverpool Bay area.

The ARB requires use of modern assessment tools, further independent studies, and additional work beyond that imposed by the lax legislation and regulations presently in place. Without this additional information, an adequate basis for decision is not present. From the experiences of the Twin Bays Coalition, insufficient evidence of tolerable levels of harm have been presented. These applications should be denied, especially under this factor.

CONCLUSION

The lack of appropriate research and study using modern modeling and sampling techniques can be attributed to outdated legislation. Confining the basis of their decision to what is legislated instead of what is possible and necessary, undermines the credibility of any ARB decision and increases the likelihood of appeal.

This would be an unprecedented, industrial scale upheaval of established patterns of life, livelihoods, local fish and fish habitat. Most of the benefits articulated by the proponent are vague and uncertain. Consultations with Government and other organizations were restricted by limiting their assessments to presently available information rather than allowing additional, more detailed study.

The ARB must seek more precise facts and figures from the proponent, DFO, Government, businesses, and residents to formulate a sound basis for a decision. Failure to do so means that the ARB is comfortable having the Government and industry dictate the terms on which a decision is made.

¹ Page 31, Canadian Science Advisory Secretariat Maritimes Region Science Response 2022/039

The Twin Bays Coalition finds the arguments and information forwarded in favour of these applications to be inadequate and therefore, the three applications must be rejected.

Sincerely



Derek Purcell
Senior Volunteer
Twin Bays Coalition

twinbays.ca

RECEIVED*By Nova Scotia Aquaculture Review Board at 4:55 pm, Feb 11, 2024*

To Whom It May Concern,

My name is Tim Stone. I am general manager and vice president of aquaculture intelligence at Innovasea, an aquaculture technology company based in Bedford, Nova Scotia, and I currently reside in Dartmouth Nova Scotia.

I am writing to voice my support for Kelly Cove Salmon Ltd. and its applications for a boundary amendment and two new marine finfish aquaculture license and leases for the cultivation of Atlantic salmon in Liverpool Bay, Queens County.

Kelly Cove Salmon's proposal to develop two new Atlantic salmon farms and expand the boundaries of its current farm, is a prudent and responsible use of Nova Scotia's natural resources and will provide an economic benefit to the region in the form of job creation, additional business for Kelly Cove vendors and suppliers and additional tax revenue.

Innovasea is long-time supplier of environmental monitoring technology and other solutions that currently aide Kelly Cove Salmon in farming Atlantic salmon in a safe and responsible manner. Innovasea's mission is to make aquaculture more sustainable, and partnering with companies like Kelly Cove Salmon enable us to deploy, test and improve our technology in a real-world setting.

The Kelly Cove operation was instrumental in helping Innovasea develop and fine tune its wireless aquaMeasure environmental sensors and other precision aquaculture technologies, which are now used at over more than half of the Salmon farms worldwide to grow safe, sustainable fish.

Since first doing business with Kelly Cove Salmon, Innovasea has expanded to more than 275 employees worldwide, 150 of which work out of the Bedford office.

In all the years of working with Kelly Cove Salmon and its personnel, I have known them to be safe, conscientious fish farmers who care about the environment and consider themselves stewards of the ocean around them.

Thank you for your consideration.

Tim Stone

DAVID NICKERSON

[REDACTED]
[REDACTED]
Liverpool, NS [REDACTED]
[REDACTED]

February 9, 2024

Clerk of the Board

NOVA SCOTIA AQUACULTURE REVIEW BOARD

60 Research Drive

Bible Hill, NS

B6L 2R2

Via email: Aquaculture.Board@novascotia.ca

Dear Chair:

This written submission is in relation to 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.

Please DO NOT APPROVE the application by Kelly Cove Salmon Ltd (owned by Cooke Aquaculture). I would like to go on record against this application, or any application in the future.

I am 66 years old and have lived here my whole life so I think I know my community well. My family has been in Queens County for five generations. In fact, my family used to dry fish on racks on Coffin Island.

I am an amateur photographer and spend a lot of time around our shoreline finding just the right shot. Right now, it can sometimes be difficult to find an angle that excludes the current fish farm at Coffin Island AQ1205x. When it was a small farm of six pens it was relatively flat/low and not as much of an eyesore. Now that it is 14 pens it sticks way up and it harder to avoid. The pens and the feeder barge are a real eyesore. If your Board approves three sites with 60 pens that will be a real shame. It will detract from the beautiful scenery. It will be difficult to capture the natural beauty of the ocean with that ugly equipment in the background. Visitors come to the South Shore from all over the world to enjoy our scenery and recreation opportunities. Three feeder barges running engines and lights all the time will not enhance our community at all.

According to The Chronicle Herald's article by Don Mills February 3, 2024 Cooke Inc. is said to be "the world's largest PRIVATE seafood company". In an interview with Glenn Cooke, he goes on to say the revenue for Cooke this past year was more than \$4 billion. The company uses what is referred to as a vertical integration system. Simply put, this means they have created their own network of companies. A monopoly of sorts, providing work to hatcheries, feed production facilities, fleet of vessels, processing plants and transportation companies, all owned and

operated by Cooke's around the world. This is a very lucrative way to keep all profits to themselves as a privately owned, family company. It is well known that the communities that have open pen farms around the world are doing everything they can to get them kicked out or slowed down.

One of the reasons for this profit is not having to clean up the waste created by their "farms". They can pollute harbours at will and never worry about the long-term outcome. Of course, you make money if you can pollute the ocean without consequence. No other "industrial farmer" on land gets to distribute animal waste wherever and whenever. Any other industrial farmer has to control where animal waste goes and how it is treated. They cannot let it flow into the ocean or any waterway. Yet, you are contemplating allowing Cooke (KCS) to have 1.98 million salmon in our Liverpool Bay, with their waste and food waste each and every day. Only a tiny fraction of Cooke profits may extend to our local economy because they take the profits elsewhere and process the fish elsewhere. There may be a few low paying labourer jobs at the cage sites, but the operation will be damaging an environment that currently supports hundreds of jobs in Fishing and Tourism. KCS's current and promised contribution to our community is a fraction of the current economic and social activity coming out of Liverpool Bay. It does not make sense to risk one for the other? ***Factor B: The contribution of the proposed operation to community and provincial economic development.***

Cooke is unhappy about the underutilized access to the seacoast in Atlantic Canada, no doubt seen as a financial opportunity without strings, and is frustrated by the regulatory red tape. Perhaps there is a failure to consider that the public support is not there. Some would argue that aquaculture is one of the healthiest methods to farm animal protein. If done properly, perhaps it is, but not if that involves altering the genetics of the salmon to be faster growing and disease resistant. No

thank you to these mushy, fatty GMO fish. This is not the best use of our marine resources. Only those whose pockets are being lined could support such a mission. We already have optimum use taking place with many different users working and playing in the harbour. Turning huge areas of our harbour into “single use” for the benefit of one foreign company is not “Optimum Use” when it displaces so many others. The pollution from these farms does not stay under the farm, it will slowly spread across the ocean floor and effect a huge area. ***Factor A: The optimum use of marine resources.***

If you want to talk closed-pen fish farms, well that is a different story. This would be the most responsible way to proceed, if you insist on growing GMO fish at all. I could support that, especially, and only if that meant building the facility locally along with a processing plant that could be federally and provincially funded to profit local communities, not one single company. Overwaita Food Group, Safeway, and Loblaw's have written Canadian government officials in support for closed containment systems and the need for federal support for the development of sustainable aquaculture. ***Factor B The contribution of the proposed operation to community and provincial economic development.***

Sustainable Blue, Kuterra, Whole Oceans, Starfish, Lighthouse, and Pure Salmon, are just a few of the companies around the world that use land based recirculating aquaculture systems [RAS]. These companies are paving the way of the future. Let us learn from our mistakes and raise the bar for protecting the environment; reduce the impact, enhance biosecurity, minimize pathogens and the need for chemicals. RAS allows us to collect and control waste, to reduce pollution discharge and recover nutrients. It allows us to control the farming environment for optimal fish growth without genetically modifying the DNA of the salmon. RAS allows us to control temperature, water quality, feed, and other environmental parameters as not to endanger the wild salmon

population or ocean habitats of other species. There are many Commercial, Aboriginal and Recreational fishing activities currently taking place in Liverpool Bay. Our community can not afford to lose these activities or have them reduced by any amount. It does not make sense to favour the polluter over the sustainable fisheries that already exist. Instead, we could allow closed pen operations on land and still have all our current activities in Liverpool Bay. I would rather see our tax dollars that are budgeted to DFA going towards promoting closed containment rather than open pen finfish farms. It is hard to believe that Intervenors/Tax Payers in this process have to spend their own money fighting against a Provincial Department that is funded by those same tax payers. ***Factor C: Fisheries activities in the public waters surrounding the proposed aquaculture operation.***

The cumulative impacts of approving this application will place a burden on local fishermen, tax payers, lobsters, mussels, scallops, health of harbour and marine life, local economy, real estate, tourism and many more factors than the 8 that are considered in this Review Board process. If you are looking for public support, reject the application for open pen farms and set the stage for closed ones. Also, to any politician that may be reading submissions to this Board, please remember it is not acceptable these days to pollute environments for the sake of a few jobs. Especially when there is better way to grow these fish.

Over the last few decades Nova Scotia has moved forward with cleaning up some environmental disasters and not allowing others to go forward. We do not need to act like “the poor cousins down the road” that will allow polluting industry just for the sake of a company “from away”. We must protect our pristine, clean waters for the sake of our citizens and the future generations. If Cooke (KCS) is allowed to have 60 fish pens in our shallow bay, we would be stuck with decades of harm. Cookes will then just walk away with the profits and leave us with the mess to clean up.

In Port Mouton it took years for that Bay to recover from a small farm. We do not want that to happen here in Liverpool Bay or surrounding area.

You have the power to stop this risk before it happens.

Thank you,

(Sent via email)

David Nickerson

Cc Premier Houston

Cc MLA Masland

Cc Minister of DFA Smith

Cc MP Perkins

February 9, 2024

Sean Burke

Brooklyn, NS

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:06 pm, Feb 11, 2024

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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.

Our family lives directly across from the current fish farm; we are not in favour of the existing fish farm and are opposed to more aquaculture licensing as it puts our wetlands and public at risk.

Legislation: Fisheries and Coastal Resource Act, and the Aquaculture License and Lease Regulations Section 3, parts c) and d):

- Fishery activities in the public waters surrounding the proposed aquaculture operation;
- The oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;

According to the report filed in December 2022 in the “**Review of Antibiotic Resistance Genes in Salmon Aquaculture and Empirical Data on Spatial and Seasonal Trends in the Bay of Fundy**” the serious dilemma with high densities of fish farms and the spread of bacterial diseases is explored and outlined. Further to the point is the use of antibiotics which becomes another, equally problematic issue affecting human and animal health.

“The practices associated with aquaculture provide a prime breeding ground for bacterial diseases due to the relatively high densities of fish...There is free exchange of water with the ocean and substances such as fish feed, medications and feces are able to pass through the net pen into the surrounding environment (DePaola et al. 1995) Fish in a sea cage are crowded and stressed, besides not able to engage in their natural migratory behaviours. (Burrells et al. 2001)..The stress placed on fish by these conditions has a negative effect on their immune systems (Burrells et al. 2001).”

The response to treating or preventing infectious diseases has been to use a variety of antibiotics. “The presence of antibiotics and antibiotic resistant genes in the environments surrounding fish farms alters the biodiversity of the bacterial communities endemic to those areas. This occurs because resistant strains of bacteria can out-compete non-resistant strains.(Watts et al. 2017)”

Liverpool Bay, specifically Beach Meadows, is not the site for the proposed aquaculture operation. Elevated amounts of bacteria, parasites, viruses and fungi in such a setting is countered with the use of antibiotics, some of which are also used in human medicine. The long term effects of such practices are projected to have devastating impacts on our healthcare system.

Thank you for your thoughtful consideration.
Sean Burke

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:08 pm, Feb 11, 2024

February 7th, 2024

Fall Pond

[REDACTED] 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

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.

As a director of Fall Pond Conservation Coop and a resident on the shore of Queens County we write this letter to inform the Board that Fall Pond Conservation Cooperative (FPCC) **opposes 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*).**

This amendment is unscientific and unethical; posing substantial danger to ecology, including but not limited to species protected under the SARA ACT, and threatens the economy of the region.

In review of documents made available to the public by DFO: The oceanographic and biophysical characteristics of the public waters of Liverpool Bay are too shallow for such infrastructure, especially given the storm surge and wave heights, as well as increased velocity and frequency of hurricanes. One corner of these proposed cages is marked at 4m, while the deepest is 20 m. This depth is under the current required depth for marine fish farming.

As a note of concern DFO's assessment documents do not provide up to date data for reference. There is no inclusion of recent **Hurricane Lee (September, 2023)** which brought wave heights in Liverpool Bay was measured at 13 m (43 ft) Storm surge was reported to be six m (20 ft) above high tide. Roadways in the region (such as Western Head) were destroyed during impact. Debris from the existing marine fish farm in Beach Meadows was found on Eagle Head Beach, West Berlin Beach and East Berlin Beach, and likely elsewhere. Where is the up to date documentation of the damage and risks of current Hurricane predictions? **Consider if Hurricane Fiona (September, 2022)** with a peak wave height of 30 m (98 ft) Banquereau Bank had hit Liverpool Bay, fish in cages would have stood no chance.

Wild Salmon, protected under the SARA ACT, use nearby waterways of the Medway from the Port Medway Harbour, the proximity of these proposed cages are proximal to Wild Salmon running. The Port Medway Harbour is connected through waterways with Fall Pond Conservation Cooperative (FPCC) located behind East Berlin Beach, as a director of the FPCC the concern of the ecological impact cannot be understated.

The change in ecosystem due to the existing marine fish farm off shore from Beach Meadows Beach is telling of the harm of a growing fish farm industry, presenting more dead fish, debris, murky musky smelling water, harmful sonar use, fish lice, similar to other areas that have allowed marine fish farming to take place ; a mounting loss for a community known for its beautiful pristine and peaceful intertidal spaces.

It is our understanding that those involved in the lobster fishery, both Indigenous and non-Indigenous, will present their opposition to this amendment. I stand with all fishers in the protection of their right to fish and maintain healthy oceans.

The illusion that more jobs will be created by this increase in presence of Kelly Cove Salmon Ltd., is unethical in principle, few jobs have been created so far (6) while the livelihood of those in the local fisheries and tourism will directly be impacted negatively.

For the above reasons I, a director of Fall Pond Conservation Cooperative (FPCC), oppose **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*)**.

With Deep Concern for the Health of Region of Queens/Kespukwitk,

Josh Collins, Director on Fall Pond Conservation Cooperative (FPCC)

From: [jane dunlop-stevenson](#)
To: [Aquaculture Review Board](#)
Subject: 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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.
Date: February 9, 2024 8:40:07 PM

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

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Hello,

Nova Scotia is a province renowned for its natural beauty and has no trouble living up to the name, "Canada's Ocean Playground". I am fortunate to have lived with the view of Liverpool Harbour most of my life. I have been awed by the beauty of both good and foul weather. When the nor'easters blow, Liverpool Harbour is wild! Wind, waves, and storm surge, the present farm at Beach Meadows has been damaged many times with much debris landing on our shore including Styrofoam beads from the floats and dead fish. Cleanup after an event is impossible. Fish farms should be banned from Liverpool Bay, they pollute.

Inhumane treatment. There is no question that these fish are stressed by the overcrowding and confinement. KCSL cares not about the living conditions of the fish, only the almighty dollar. Wild salmon rely on freedom to swim both in square footage as well as depth. KCSL has been fined in the past for having too many fish in their pens. KCSL will not change their ways. Repeatedly we have seen their breach of regulations go without more than a slap on the hand. Their practices must be watched, no straying from regulations is acceptable.

Feces, chemicals and antibiotics destroy the marine environment. KCSL claims to be and is designated as a "farm". Issues of runoff and pollution created by farms are to be properly regulated to create a clean industry. It seems the existing fin fish farm at Beach Meadows is somehow exempt from these regulations. Why is effluent, which includes feces and antibiotics, allowed to be flushed into our bays twice a day? I own 192 feet of shoreline along Liverpool Harbour and I swim in the water all year. This fin fish farm is polluting my property and the water I swim in. This is not acceptable! If this application is allowed, the sewage equivalent of 107,000 people will be directly piped into every yard along the shores of the harbour and Mersey River. This should not be allowed to happen to the residents and tax payers of Queens County.

This expansion will infringe and potentially destroy the lucrative fishery that has existed and supported local families for centuries. The expansion will do nothing financially for Queens County that is worth the loss of the local fishery to an out-of-province company.

I have expressed a few reasons why I feel this expansion should not be granted. KCSL and Cook are not a good fit for Queens County. Our regional government, our MLA, Kim Masland, Premier Houston, and the most important, the citizens of Queens County are in agreement of that fact. Queens will not reap any benefits through employment opportunities or financial gain. We risk the ruination of a lucrative lobster fishery, pollution of the water and shore, diminished enjoyment of the visual beauty and the recreational use of our harbor. The fin fish proposition is a disaster waiting to happen. And it will!!

I am strongly opposed to this expansion. Please listen to the people.

Regards,

Jane Stevenon

 Liverpool, NS

Sent from my iPad

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:23 pm, Feb 11, 2024

From: [Clyde Fisher](#)
To: [Aquaculture Review Board](#)
Subject: Fish farms
Date: February 9, 2024 9:55:26 PM

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Fisherman and all others have been fighting Spence the first fish farm in port mouton bay since around 1995. We as fisher's leaned fish farms change the hold bay is a kill sign. We have done lots to prove this . But when you have people payed to do the work for the fish farms. These people get payed to work for them. We have had them out to see how it comes back . Even with there own eyes there try to tell government and others just the lies and yes Df0 has always been on there side you have to be there like use to watch how there turn things around for them. Been therein our bayside by side telling lies. Fish farm's bestowed lobster fishing and destroy the bay fishing. Now it's all started coming back so not three or four jobs. It's now I see our bay coming back and this bay is now providing 30 to 50 jobs plus lots off money for the municipality off queens now it is also giving more money to this area. What happened to our bay with this frams all way take way more then comes back to the people . No fish farms should be in the bays but on land.

Sent from my iPad fishing

DARTEK TRANSPORT LTD

[REDACTED]

Merigomish, NS, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



To Whom It May Concern,

DARTEK Transport is a fish hatchery and live fish transport trucking company operating out of rural Nova Scotia. Our main source of revenue is growing approximately 900,000 salmon and trout yearly in our two locations (Baileys Brook and Barney's River). Our two hatcheries employ just under 30 people. DARTEK has been in operation since 1994 and has been a great opportunity to our small community to offer jobs that otherwise would not exist. We are currently in the early planning stage of building an additional hatchery and in the talks of purchasing another hatchery.

We transport live fish for Kelly Cove Salmon and several other companies. Approximately 75 percent of our revenue comes from growing fish and transporting live fish for Kelly Cove Salmon. We have a successful relationship with Kelly Cove Salmon and hope to continue to do so in the years to come.

Warm regards,

Doug MacEachern
Owner/Operator

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:39 pm, Feb 11, 2024

From: [JACQUELINE LEACH](#)
To: [Aquaculture Review Board](#)
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: February 10, 2024 1:55:23 PM

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William John Bell
[REDACTED]
Riversdale, NS
[REDACTED]

February 10th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

I have been a resident of the area for nine years and am writing to say I am not in support of the application for expansion of the Kelly Cove Fish licenses and leases. My biggest concerns are related to the following:

Kelly Cove Salmon Ltd and Cooke group have failed to show that they are good corporate citizens. They have exceeded their lease boundaries in the Digby area and at AQ1205 (Coffin Island site) they have exceeded the approved boundaries and they subsequently chose not to reduce it to acceptable limits. They have been heavily fined in Maine and closed in Washington State. All these remedial actions take huge resources of time, energy, and money – something Nova Scotia does not have a lot of. I for one do not wish to see the resources of our citizens being wasted chasing after a company that has already proven their unworthiness. KCSL should not be allowed to expand their operations in Nova Scotia. NS Aquaculture License & Lease Regulations – Section 3 – Factor 8

The threat to wild-caught fishery, especially lobsters. Why would we as Nova Scotians accept an industry that could compromise a centuries old fishery – our lobster is shipped around the world because of our reputation of quality. We as a province have worked hard to be a sustainable, regulated, and clean industry. The same standards as well as full transparency must be included in any application for expansion of existing fish farm and proposal of new fish farms off our shores and beaches. NS Aquaculture License & Lease Regulations – Section 3 – Factor 3

Broken net debris. The frequency and strength of storms in Nova Scotia have resulted in increased debris on our shores. Predator nets in fin fish farm needed to repel birds such as seagulls and eagles are, through necessity, on the surface of the pens making them even more susceptible to damage and destruction during storms than the local fisheries whose nets lie below the surface. This will result in increased net debris on our shorelines and floating in the water – resulting in increased entanglement with resident wildlife as well as recreational boaters. KCSL has been

finned for net pen collapse in Puget sound – why would we be willing to wait until this happens – the precedent has been set. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

Establishing open pen net fish operations will not contribute positively to the sustainability of Atlantic Wild Salmon. Containment issues with the existing AQ1205 operation have already occurred, therefore expansion would only increase endangerment of the existing stocks. With expansion there becomes greater opportunities for escape. Also diseases resulting from stress due to crowding in the pens will be more difficult to contain. NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

In conclusion, I want this letter to register my complaint about this process and my wish for it to not go any further.

Sincerely,

William John Bell

February 10, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:55 pm, Feb 11, 2024

Marilyn Keddy

Stonehurst, 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

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 this letter as a private citizen to register my concerns regarding the application from Kelly Cove Salmon Ltd proposing a boundary amendment and two new licenses and leases in Liverpool Bay. My submission is based on the factors you have defined that guide your decision making process. (listed at the end of the letter and highlighted). Based on the evidence, including the public opposition, I do not support the approval of this application.

The existing open net pen site in Liverpool Bay and the proposed expansion will significantly enlarge the area occupied by Kelly Cove Salmon Ltd to the detriment of other users, such as the marina, fishers and those who enjoy the beauty of the ocean. The revenue generated from these local operations stays in our province, thus making a significant contribution to the economy. Kelly Cove Salmon Ltd, a subsidiary of Cooke Aquaculture is based In New Brunswick where the lion's share of the operation is and where the revenue flows.

All of us living in Nova Scotia have increasingly been experiencing the impact of the climate crisis. A healthy ocean is key to restoring the planet. The negative environmental effects of open net pen salmon farming are numerous and well-documented. Anchored in our bays and crowded with farmed fish, open net pens leak diseases, parasites, chemicals, surplus feed, and tons of feces into the surrounding ecosystem where it is spread by currents and tides. Storms damage the cages scattering broken gear on our shores.

The operation in question is adjacent to one of the most beautiful beaches in the province, Beach Meadows. Do we want to risk destroying the beauty of our “Ocean Playground” with sludge and debris from an open net pen? The loss to tourism of such a decision will far outweigh the financial benefits of open net pens to the local and provincial economy.

Studies show that waste and chemicals from fish farms have negative impacts on environment and aquatic life living adjacent to farms on the ocean floor. Chemicals released into the ocean near open net pen fish farms alter the chemical balance of the sea in the area, resulting in low oxygen levels in the water. This means that only certain life forms can thrive there, while others die off. Already we have studies that document the decrease in lobster catches near open net pens in Nova Scotia.

Farming one metric ton of salmon creates waste equivalent to eight people. In Nova Scotia it is against the law to not properly dispose of sewage. Why are we allowing an industry to dump sewage laced with pesticides and antibiotics into our ocean? This must be stopped to save our ocean and everything that lives in it.

The added pressure of interbreeding between farmed (escapees) and wild Atlantic salmon represents another huge threat to already depleted wild salmon stocks. Researchers estimate that farmed escapees need only account for 10 per cent of an otherwise wild population to produce irreversible damage to the fitness of future generations.

So, I ask: Would it be bad for the environment to eliminate these impacts on beloved wild salmon populations? Would it be bad to eliminate the thousands of tons of dead fish and fecal matter that’s allowed to flow freely from salmon farms into surrounding seas and shores? Would it be bad to eliminate the pesticides deployed on salmon farms, risking lobster stocks and other wild fish that our coastal communities rely on? The answer hardly needs stating.

In closing, I am dismayed that the ARB rejected several applications for intervenors status that have knowledge that is essential to this decision making process. I am specifically referring to the applications from the Ecology Action Centre, South Queens Chamber of Commerce and Catherine Collins and Doug Frantz. All of whom would have made a significant contribution to the ARB deliberations. Should the ARB as the regulatory body not be accessing as much credible information as possible to aid in their decision making? It is difficult for the public to have confidence in a process when applicants such as those mentioned above are denied standing and the proponent has reviewed the list prior to approval. This approach appears very imbalanced in favour of the industry. Public confidence is lacking in this process.

In light of all of this, I urge you to deny the boundary amendment and new licenses and leases to Kelly Cove Salmon Ltd in Liverpool Bay.

I thank you for your consideration, and I hope that you will be persuaded by the public opposition and the very detrimental environmental, social and economic impacts that would result from a decision in favour of the Kelly Cove Salmon Ltd request. I agree with Premier Tim Houston who personally opposes the plan for any more fish farms in Liverpool Bay.

Respectfully submitted

Marilyn Keddy

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

Factors to be considered in decisions related to marine aquaculture sites

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;
- 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;
- d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;
- e) the other users of the public waters surrounding the proposed aquaculture operation;
- f) the public right of navigation;
- g) the sustainability of wild salmon;
- h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:57 pm, Feb 11, 2024

From: JACQUELINE LEACH
To: Aquaculture Review Board
Cc: [REDACTED]
Subject: APPLICATIONS (AQ#1205X, AQ#1432, AQ#1433)
Date: February 10, 2024 4:25:30 PM

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

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Margaret and Michael Perry
[REDACTED]
Liverpool, NS
[REDACTED]

February 10th, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

In 1982, I moved to Liverpool with my family as a teenager and my husband's family also moved here a few years later. Our children had their toes first dipped in the Atlantic Ocean of Beach Meadows Beach. Our family history is entrenched in the South Shore. We are retiring in the near future. In 2023, we purchased [REDACTED] to build our retirement home and short term lease the existing home for retirement income. We are writing to express our strong disagreement with the approval of the expansion of the Kelly Cove Salmon Ltd. License and Lease agreement.

At some point in Queens County's history, while we were busy with our young family, a fish farm was approved off Coffin Island/Beach Meadows. We digested this change as Nova Scotians who understand that changes happen. Since that time, there is substantial evidence that open pen fish are not healthy and are a danger to the environment. This is known globally. We were appalled to discover that an application was coming up for review in 2024 for expansion of the fish farm. As far as we knew, when the application was first up for discussion, there was such profound pushback from the community that Cooke/Kelly Cove backed down. Presently, we are disturbed by the existing site of the fish-fish aquaculture (AQ#1205X) and are seriously concerned, as well as upset, that it could expand.

Our plan for the property is to build our retirement home, and to convert the existing structure on the property to short term rental units. Beyond generating retirement income, these units will also contribute to the tourism and hospitality sector of the Liverpool area. Tourists come to Queens County for its natural beauty, not mega fin fish farms dominating the vista of Liverpool Bay. NS Aquaculture License & Lease Regulations- Section 3 - Factor 1.

We are professionals who work in Halifax and New York City, USA. Americans' perception of Nova Scotia is that we have pristine waters. If you look at a New York restaurant menu, it has NS lobster from it's 'pristine, clean waters'. American tourists would be stunned to know that NS allows its waters to be contaminated by fin fish aquaculture.

In a recent Sobeys flyer, they promoted NS lobster as being 'harvested from the cold clean waters on the East Coast of Canada'. The ARB has a duty to protect the lobster fishery, of which a substantial percentage of lobster come from.

Significant commercial and residential opposition exists toward this expansion. We expect the board to respect the wishes of the constituents of Queens. There is no local support for the expansion, regardless of how the application has been spun. Cooke/Kelly Cove is in the business to make money, regardless of how the population feels about their presence.

Feeding the doubled world demand, quoted in their application, can be accomplished with land-based, safe production that does not endanger the environment. Land-based fish production contributes to the economy, without the significant environmental consequences of ocean-based mega fin fish farms. Our family only buys land-based raised salmon (Sustainable Blue). We do not consume farmed salmon, from vulnerable ocean waters, that contain pesticides and antibiotics.

In conclusion, please do not approve this application for all of the reasons given above.

Sincerely,

Margaret and Michael Perry

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:33 pm, Feb 11, 2024

NSARB-2023-001-WRT-078

February 11, 2024

Sibylle Bechtold

[REDACTED]

Port Medway, Nova Scotia

[REDACTED]

Submitted via email: Aquaculture.Board@novascotia.ca

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

To the ARB Clerk and Board:

Re: *The application by KELLY COVE SALMON 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*

My comments and personal opinions below relate to the Section 3 of the Regulations, pertaining to the following factors: a) The optimum use of the marine resources.

As one drives west on Nova Scotia's Highway 103 past Bridgewater towards Liverpool, a somewhat distractingly large and colourful sign marks the boundary between Lunenburg and Queens counties. And it welcomes the traveller emphatically to Queens County with the slogan:

Queens County
'Seek Nature's Rewards'!

Then, on Queens Co.'s website, you will read: "Since time immemorial, travellers have journeyed these waterways. Then, as now, our tagline, "**seek nature's rewards**," invites people to explore, and venture just a little further to discover the unrivalled natural beauty of Queens Coast."

.../2

Sadly, though, behind the invitation hides (not even that discretely) a rather dark reality. One wonders what the public relations rationale of this tagline actually is. Appeal to the naïveté of people? Cover up what so blatantly ails our shores and the ocean that laps against them? Or simply being oblivious of the dubious nature of the message?

Frankly, the irony is simply a little much for the people, who live here faced with that reality on a daily basis.

So, how about a walk along the beautiful Beach Meadow's beach. What a lovely name! It elicits an image of nature at its finest. Now let's 'explore' further. Ah, but what is that we see? There, smack in the middle between beach and a picturesque island – not far from either – are the nets of an open pen fish farm holding raised salmon and more often than not, attended by their feed boats. Then, as we keep walking along the shore, we find debris, polluted foam, and much evidence of the farm that should tell us 'do not swim or even walk in the ocean here, you'll never know what might stick to your skin or squelch between your toes'! Quite disgusting. Really? Are these the 'rewards of nature' Queens County has on offer?

And that is just the visible manifestation of the characteristics of these fish farms. The larger scale offense can no longer be ignored. Over the years, much has been documented to show not only the misery of the contained animals but also the environmental impact. Sea-life and human-life are equally affected. There is absolutely no convincing intelligent argument that speaks against this.

Everyone has to make her or his own decision as to dietary choice. No argument there. But let's face it, when the harmful impact of consumerism and industry extends to a fragile ecological environment that, while it does NOT BELONG to us (!), still offers us humans all the unaltered benefits of nature, including healthy sustenance, then we have the responsibility to object! To speak out loudly. To refuse forcefully!

Are we really so oblivious to the insidious ways in which a lucrative industry manipulates our consumerism? One only needs to look at the amount of Atlantic salmon packages that lie on the shelves at reduced prices – to be thrown out once it is beyond the expiry date for human consumption. Yes, I know that it MIGHT become a by-product in some way but, in the meantime, we are witness to the result of another despicable, wasteful, unsustainable farming method – there is no other way of phrasing it – which has no place in an educated society. Mind you, a society that frivolously seems to play with its own expiry date.

There are acceptable alternatives. Why not be a true leader in the industry and ensure sustainability that is based on respect and ethics. Respect for the consumer, respect for the animals, respect for the environment! I wonder, is there a code of ethics for the fish farming industry? There actually may be a surprising unexplored profit in that...hmm!?!

I have not walked on Beach Meadows beach for some time. It upsets me. I tell people about the 'sacrificial salmon' on the altar of greed. I rant. And, I so very much lament our impending loss of the long maritime tradition that honours a respectful sustainable life. Unless we change direction - now!

These farming practices are not a benefit but a threat – a very serious threat! Open pen fish farms have no place here or anywhere else!!!

When will we learn?

Sincerely,
Sibylle Bechtold

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:11 pm, Feb 11, 2024

From: [REDACTED]
To: [Aquaculture Review Board](#)
Cc: [Premier; Minister DFA; kim.maslandmla@gmail.com; Minister, Env; Health and Wellness Minister; Economic Development Minister; garyburrillmla@gmail.com; \[REDACTED\]; leader@greenparty.ca; rickperkins@parl.gc.ca; justin.trudeau@parl.gc.ca; DFO.Minister-Ministre.MPO@dfo.mpo.gc.ca; minitre-minister@ec.gc.ca; ministerofred-ministreduder@ised-isde.gc.ca](#)
Subject: Applications (AQ#1205X, AQ#1432, AQ#1433)
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To: Clerk of the Nova Scotia Aquaculture Review Board
 60 Research Drive, Bible Hill, NS B6L 2R2

From: [REDACTED] Delphine Dexter, [REDACTED]
 [REDACTED]
 Bridgewater NS [REDACTED]

February 10, 2024

Dear Sirs:

Re: Application by Kelly Cove Salmon Ltd - sites AQ#1205x, AQ#1432 and AQ#1433

We would like to make the following comments in **objection** of the approval of the applications by Kelly Cove Salmon Ltd for additional open pen fish farming sites in Liverpool Bay as noted above. Our comments relate to the following factors as defined under NS Aquaculture License & Lease Regulations Section 3 -

- Factor a
- Factor b
- Factor d
- Factor e

We am worried that so many pens in this small shallow bay will **adversely** affect our way of life now and will reduce our and our community's quality of life in the future. We have lived through months of road closures and dust and dirt while sewer (and water) lines were installed ... continue to see this clean up with new projects. Allowing the proposed density of penned fish will reverse this progress and **foul our bay** again.

[REDACTED] lives near the existing pens and Beach Meadows Beach and have family and friends and visitors who spend much time on Beach Meadows Beach and have seen the damage that storms continue to do to the beach both from wind and water. Following the storms it takes a while for the operators of the current site off Beach Meadows Beach to clean up the beach, and we wonder what is left on the ocean floor underwater.

Our community has worked hard to establish and maintain the Brooklyn Marina –we am concerned that the **enjoyment of recreational boating will suffer by the loss of the area taken by the fish farms** and perhaps visiting sailors will choose another stopping spot that is more accessible.

Our community has gained much needed new doctors – many of them came for the small-town feel, good schools, and the ready outdoor life – pristine beaches, fresh sea air, great surfing, sailing, ocean dips and hiking all over. We am concerned that

this trend will not continue.

The **noise, smell and debris of the existing caged farm fish** are noticed now – we are concerned that the increased density will affect even more of our coastline and the people who live there. We have family property near the new proposed site on the Brooklyn side and we are concerned that our property values will be adversely affected.

Thank you for attention to these comments. **Please do not approve these applications.**

Sincerely,

[REDACTED]

Delphine Dexter

CC

Hon Tim Houston, Premier

Hon Kent Smith, Minister of Fisheries and Aquaculture

Hon Kim Masland, our MLA

Hon Tim Halman, Minister of Environment

Hon Michelle Thompson, Minister of Health and Wellness

Hon Susan Corkum-Greek, Minister of Culture, Comm, Tourism and Heritage

MLA Gary Burrill, NDP Caucus Office

Hon Zach Churchill, NS Liberal Party Caucus

Anthony Edmonds, Green Party Leader

MP Rick Perkins, MP South Shore-St Margaret's

Rt Hon Justin Trudeau, Prime Minister of Canada

Hon Diane LeBouthillier, Minister of Fisheries and Oceans

Hon Steven Guilbeault, Minister of Environment and Climate Change

Hon Gurdie Hutchings, Minister of Rural Development

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:21 pm, Feb 11, 2024

Nova Scotia Aquaculture Review Board

60 Research Drive
Bible Hill, Nova Scotia
B6L 2R2

Patricia Simms[REDACTED]
Brooklyn, Nova Scotia
[REDACTED]**Kelly Cove Salmon Ltd. (Cooke Aquaculture) - Aquaculture Licence and Lease Regulations**

Dear Board Members,

I am writing to express my strong disagreement with the proposed expansion of the Kelly Cove Salmon expansion in Liverpool Bay. As a concerned resident and advocate for environmental conservation, I feel compelled to voice my opposition to this project.

The expansion poses significant risks to the delicate ecosystem of the area. Salmon farming, particularly in open-net pens, has been associated with numerous environmental concerns, including pollution, habitat destruction, and the spread of diseases and parasites to local species. Liverpool Bay is home to diverse marine life, including important fish stocks and sensitive habitats. Introducing a large-scale salmon farm into this ecosystem could have disastrous consequences for its biodiversity and overall health.

Furthermore, the expansion of the salmon farm threatens the livelihoods of local fishermen and the coastal communities that rely on sustainable fishing practices. Industrial aquaculture operations often lead to the displacement of small-scale fishers and are proven to have detrimental effects on traditional fishing grounds. In Liverpool, where fishing has been a way of life for generations, it is crucial to protect the interests of these communities and ensure their continued prosperity.

Lastly, on a personal note, my family's ties to Nova Scotia run deep. We arrived in Lunenburg from Germany over 250 years ago. I was the first generation born outside of the province and I chose to move *home* because this province and its beauty are in my soul. I walk the shores of Beach Meadow's Beach with my dogs daily and I have heard from so many community members how fearful they are of this expansion. There is overwhelming and undisputed scientific evidence to suggest organizations like Kelly Cove Salmon do not act as good corporate citizens and frankly it is insulting to assume that such information and evidence is not easily found.

I urge the board to reconsider the proposed expansion and instead focus on alternative, more sustainable methods of seafood production. There are innovative aquaculture technologies available that minimize environmental impacts and investing in these methods would not only mitigate the risks associated with salmon farming but also demonstrate a commitment to responsible stewardship of our marine resources.

In conclusion, I strongly oppose the expansion in Liverpool Bay, and urge the board to prioritize the protection of the environment and the interests of local communities.

Thank you for considering my concerns,

Patricia Simms

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:31 pm, Feb 11, 2024

Feb 10, 2024

Vincent Dieras
[REDACTED]

Port Medway, NS
[REDACTED]

Clerk of the Aquaculture Review Board
60 Research Drive
Bible Hill, NS
Aquaculture.Board@novascotia.ca

Dear ARB Clerk

Re: The application by KELLY COVE SALMON 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

My comments relate to Factors 1, 2, 3 and 6 of those that the ARB must consider.

As an avid sailor and lover of the oceans I reject the idea that more fish farms in Liverpool Bay is a good idea. Liverpool Bay, the mouth of the Mersey River is a relatively small, protected Bay, perfect for day sailing out of Brooklyn Marina or a good stop over for more adventurous sailors navigating the Atlantic Coast of Nova Scotia.

The sailing community is generally made up of people with disposable income and love for adventure. They do not want to sail into bays and harbours where they are faced with difficult navigating conditions around fish farms, unsightly shorelines and foul water. Should this fish farm expansions proceed this will be the case in Liverpool Bay. Word of this will spread quickly amongst the sailors and they will simply stop somewhere else along the coastline. The loss of this boating community will have real world economic impacts for a small town like Liverpool, NS.

The other claim that I would challenge is that these fish farms are supposedly meant to “feed the world”. How is that possible when the fish feeds currently used is stealing all the small feeder fish from wild fish and from some of the poorest communities in the world? Do we know where Cooke get its fish food ingredients? Subsistence fishers and their families in West Africa now go hungry as giant, foreign trawlers suck up all their anchovies, sardines and krill. All this so that we in the West can have another choice of protein.

This industry is very wrong for Liverpool Bay, Nova Scotia or anywhere else in the world. Please stop the spread of this industry while there is still a chance for the wild oceans.

Sincerely,

Vincent Dieras

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:36 pm, Feb 11, 2024

NSARB-2023-001-WRT-082

From: [Merrill Heubach](#)
To: [Aquaculture Review Board](#)
Subject: 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
Date: February 11, 2024 10:11:51 AM

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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

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>> TO: Clerk of the Board, Nova Scotia Aquaculture Review Board

>> We are residents of coastal Lunenburg County. We consider our waters to be a life force. We respectfully request that the ARB consider the overall effects of Open-Net Pen Salmon Farms in our bays, communities and economies.

>>

>> We are very concerned that the ARB is considering an expansion of Kelly Cove (subsidiary of Cook Aquaculture) Open-Net Pen Salmon feedlots in Liverpool Bay. We believe that having these fish farms are not in the best interest of our province, are not the optimum use of the marine environment and that the outcome of this application has far reaching provincial effects. Our coastal communities are dependent on healthy harbours for the wild catch fisheries and the tourism industries that sustain us. The wider effects of this lease on our coastal waters are in the Boards purview and must be considered seriously.

>>

>> The ARB must take into account how the waters are used by others. The impact of these farms is widespread: consider adjacent property owners, recreational sites, communities, First Nations territories, birds, marine animals, and other wildlife...all negatively impacted by the introduction of the filthy pens in their environment and habitat.

>

>> We enjoy ocean swimming in Queens County bays and beaches, but with fish feces, antibiotics and pesticides in the ocean, our use of local swimming places will be impacted negatively. No tourist would want to swim, sail, or surf in the infested places.

>>

>> Passing regulations for expansion of the already existing farms will only lead to more open-net pen fish farms in other coastal areas.

>>

>> The ARB hearings in March and April in Liverpool will determine whether Kelly Cove Salmon can expand their existing production by 370% at their Liverpool Bay site. With all the science pointing to the great detriment these farms are causing world-wide, we hope that these feed lots cease to exist everywhere in our coastal waters. The Kelly Cove application for expansion of its open net pen salmon farm in Liverpool Bay should be denied.

>> Respectfully,

>> Al and Merrill Heubach

>> [REDACTED], Garden Lots, NS [REDACTED]

>> [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:41 pm, Feb 11, 2024

From: [REDACTED]
To: [Aquaculture Review Board](#)
Subject: APPLICATIONS AQ1205X. AQ1432. AQ1433
Date: February 11, 2024 10:30:54 AM

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Shirley Elaine Walker

[REDACTED]

Milton, NS [REDACTED]

[REDACTED]

February 10, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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 #1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY, NOVA SCOTIA.

I am a lifelong resident of the South Shore and have lived in Liverpool for over fourteen years. I have chosen Liverpool as my retirement home. The importance of the beautiful and clean beaches and wildlife is a big factor on the quality of my senior years. As most seniors, i am on a limited income, and believe you cannot put a money value on the loss that would happen if we allow the proposed fish farm.

The following factors in particular are of concern to me.

Nova Scotia is a province of beautiful beaches, clean air, and

wonderful people. We have had examples of industrialization which have taken many years and huge amounts of money to clean up. A recent example is Country Harbour. We need to stand up for what is right rather than try to fix problems later. NS Aquaculture License & Lease Regulations – Section 3 – Factor 1

We, as responsible Nova Scotians have been doing our part to reduce our footprint and maintain the clean environment that we currently have. Liverpool Bay and Queens municipality will be left with an impossible task (and cost) of cleaning up after the fish farms are no longer viable. Once the bottom line of profit no longer exists for Kelly Cove Salmon Ltd. (KCSL) we will be left with a different bottom line – the cost of cleanup. NS Aquaculture License & Lease Regulations – Section 3 – Factor 1

As a user of the beaches, including Beach Meadows, I have concerns for the the birds including endangered species, the seaweeds and the general cleanliness of the beaches. I do not feel the following expansion offers anything to our environment - it will just take away from it. NS Aquaculture License & Lease Regulations – Section 3 – Factor 1

I want my opinion to be heard - I do not support the above application by KCSL.

Respectively yours

Shirley Elaine Walker

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:44 pm, Feb 11, 2024

From: [REDACTED]
To: [Aquaculture Review Board](#)
Cc: [Ken Wolfe](#)
Subject: APPLICATION AQ1205X, AQ1432, AQ1433
Date: February 11, 2024 11:03:50 AM

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Kenneth Wolfe

[REDACTED]
MILTON, NS
[REDACTED]
[REDACTED]

February 8, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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 #1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY, NOVA SCOTIA.

I was born in Queens County and in my retirement years returned to my birthplace because I've felt it is one the most beautiful and unspoiled places in Canada. I do not support the open-pen aquaculture industry and in particular do not support the above proposed expansion in Liverpool Bay.

Many things about the above application upset me - the following concerns in particular bother me the most:

NS Aquaculture License & Lease Regulations – Section 3 – Factor 1

The optimum use of marine resources - During my lifetime there has always been Lobster Fisheries. It has been the lifeblood of our fishing industry and Nova Scotia has always had a reputation for quality due to our pristine waters and the success the province of Nova Scotia has had around the world in promoting our lobsters. I believe all this will be jeopardized when (not if) there are fish spills leading to a direct change in the ecosystems that exist in Liverpool Bay. As well, effluent consisting of antibiotics and feces will spill into our bay every day if Kelly Cove Salmon Ltd (KCSL) is allowed to continue to use our tidal waters to flush these pens twice a day. If the application is approved (and it should not) there will be over 400% increase in the number of pens - this will result in more than 400% of effluent and antibiotics. These bi-products have no place side by side with our existing wild caught fisheries. There is no benefit to the marine community surrounding these proposed sites - the only benefit will be obtained by KCSL - in terms of savings resulting directly from the absence of a proper disposal system. If this is a fish 'farm' then it should fall under the same regulations required of any farm - proper and safe disposal of effluent and bi-products that will not endanger the existing ecosystems.

NS Aquaculture License & Lease Regulations – Section 3 – Factor 7

The sustainability of wild salmon - Open-net pens do not contribute to the sustainability of wild salmon. It does just the opposite; it jeopardizes the existing stocks by introducing sea lice, diseases, antibiotics and feces from highly concentrated and stressed 'farm' grown species not naturally existing in the Atlantic Ocean. Nothing involved in the introduction of 'farmed salmon' could possibly add a positive effect to the existing wild Atlantic salmon stocks. 'Introduced' salmon will never be (and actually jeopardize) our natural species. These open-net 'farms' should not be allowed.

I would like a response from you indicating what you plan to do to either reassure me that KCSL will do the appropriate environmental studies and will publicly disclose the results of these studies or let me know what you will do to stand up for the communities surrounding Liverpool Bay who will be left with the cleanup should our waters be dirtied. This is not a good deal for the people of Nova Scotia.

Respectfully Yours

Kenneth Wolfe

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:47 pm, Feb 11, 2024

From: Sheena Masson
 To: Aquaculture Review Board
 Cc: Minister DFA, Min.mass and m.a@gmail.com; Minister, Env
 Subject: Kelly Cove Salmon Ltd Appl cat on
 Date: February 11, 2024 11:50:45 AM

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Sheena Masson
 [REDACTED]

Port Medway, NS
 [REDACTED]

February 11, 2024

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

Via e-mail Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

Section 3 Factor 2, 4 and 5

Greetings,

The Departments website states, "The Department of Fisheries and Aquaculture has a legislated mandate to manage, promote, support and develop the fishing, aquaculture and seafood processing industries of this province. The intention is to contribute to the economic, environmental and social prosperity of Nova Scotia's coastal and rural communities." Fish farms do not contribute to environmental and social prosperity of our communities. Most of the economic gain leaves the province leaving behind damaged shores and waters and distressed residents.

The Department and by extension the ARB are tasked with this mandate. This means NOT approving applications that harm a community's shore and waters.

The written submissions say much of what I want to say opposing the fish farm expansion in Liverpool Bay. Many of these concerns will already be known to the Department. A term used in Section 3 is "public waters". Why should a corporation be able to use up and damage our waters? Remember your stated intention.

Section 3

Factor 2

Few people are hired here in Queens County on the fish farms. Even if it were more, it is not worth the environmental damage. PLUS the job creation pitch is not relevant now with many vacancies in many sectors. The company itself benefits the most from this proposed expansion.

Factor 4

AQ 3 1205 The waters between Coffin Island and the mainland are shallow and not suitable for fish farms. The existing pens should be removed. The feces affects the marine plants as is already visible.

AQ# 1432 and AQ# 1433

These proposed pens are at the mouth of Liverpool Bay. Fish farms in this spot would mean huge amounts of waste being carried in twice daily with the tide into Liverpool. The long term effect would be a polluted mess.

Factor 5

Beach Meadows is popular beach used by residents and visitors year round. The fish pens leave debris and polluted marine plants.

Our "public waters" would be affected and also the shoreline.

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:51 pm, Feb 11, 2024

February 10, 2024

Via email: Aquaculture.Board@novascotia.ca

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

Re: The application by KELLY COVE SALMON 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 Board:

I have recently moved to Pictou County but I lived on Liverpool Bay for almost 31 years. I travel to Liverpool often to visit family and friends and feel strongly about the Community and its future. I work as a Bookkeeper for many fishing families and other businesses (tourism, restaurant, construction, entertainment) in Liverpool and surrounding area. I know from this 32 plus years of experience just how much the lobster industry and tourism industry contribute to the local and provincial economy. It is always interesting to see an invoice paid by one person and then at my next job I see that same cheque in the daily deposit for another business. In a small community, all these businesses are intertwined and they rely on each other.

I have heard a 'downtown store owner' comment:

"I can always tell when the lobster fishermen are having a good season, their families are in my shop even more than usual, where would I be without them?"

My comments and personal opinions below relate to the Section 3 of the Regulations, to the following factors: a) b) c) d) e) f)

- a) The optimum use of the marine resources and c) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

I know that a huge 60 pen industrial fish farm is NOT the best use of our marine resources. Liverpool Bay is already being used optimally by many people, in many ways. Please do not allow Cooke's/KCS to displace our fishers (Commercial and Indigenous). The lobster fishery is a very important part of the local and provincial economy. It is the absolute **best example of RURAL ECONOMIC DEVELOPMENT that any politician could ask for**. There are lobster operations in almost every harbour spread around the entire Nova Scotia coastline. Their money is spent locally and is the backbone of each small community and the provincial economy. If this expansion, and the others that are planned by international companies, go through it will no doubt harm the habitat that is needed for many fisheries, not just lobster. Liverpool Bay is a nursery habitat for lobster larvae and many other species (herring, mackerel, crab, kiack, eels, etc.) All of these fishery's contribute to the local and provincial economy. Most of the fish is exported so it is "new" money coming into the community. There are hundreds of families that rely on the health of these marine resources. Most of Cooke's money will go back to New Brunswick, very little stays in the local economy or provincial economy. It is a fraction of the money brought into this local and provincial economy by the lobster fishery. We should not be doing something that will harm the habitat of the lobster fishery or any other wild fishery.

e) The other users of the public waters surrounding the proposed aquaculture operation.

The other users of Liverpool Bay area include Commercial fishers, Indigenous fishers, marine plant (Irish Moss and Rock Weed) harvesters, recreational boaters, sweet grass harvesters, recreational divers, sailors, kayakers, scallop divers, Shark boat tours, beach walkers, bird watchers, photographers. Two recent interesting users were a Beluga Whale and of course the iconic Blue Nose.

Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice and it will have a negative effect on many people. The three sites will hinder the movement of many harbour users. They are taking up a huge area and will narrow the channel and hinder small boats that fish or harvest close to the shoreline. I know the Brooklyn Marina is a popular place for sail boats from many places in the world. It would be a shame to have that activity hindered by massive fish farms narrowing the channel. The South Shore of Nova Scotia has some of the best beaches (Beach Meadows beach among them) in the province and people come from around the world to enjoy them.

b) The contribution of the proposed operation to community and provincial economic development.

Every community should have a say in whether or not their public waterways are damaged by companies from other provinces or countries. There has been only one public meeting by this Proponent, five or six years ago. I do not think this is right, they should engage with the community and “be good neighbors”. Sponsoring a few events does not make up for bringing harm to existing business and the people of Queens County. Other countries and jurisdictions are trying to kick Cooke Aquaculture out of their space, Nova Scotia should do the same. **Why is DFA aiding and promoting open pen finfish farms when the trend around the world is moving them onto land? We do not have to accept this method of finfish aquaculture in our community.**

The KCS contribution to Queens County in jobs is very minimal. Even the promised increase of 20 jobs will still be minor. A lot of the work to monitor and feed the fish is done remotely from a Bridgewater location. Most of their profit from these fish raised in Queens County will be taken back to New Brunswick. Very little will be spent in the Liverpool area. Liverpool citizens will be left with the clean up while Cooke/KCS takes the money and runs.

The overall contribution to the Province of Nova Scotia is tiny compared to the contribution of the lobster industry. If they are allowed to go forward with this expansion there will be harm to the lobster fishery. The lobster fishery has been mostly strong in past few years but it does have many challenges it has to face every season. Overall, the Provincial economy will be in big trouble if the lobster fishery starts to go down-hill from habitat destruction and displacement of fishers. There is not enough benefit to make it worth the risk.

I know the Aquaculture Review Board is only looking at one application at a time. But if this expansion is approved, it will no doubt pave the way for more fish farms up and down the coast. If you look at this issue from a broader perspective, the cumulative effect of many fish farms will be devastating to our wild fisheries. Not to mention all the fish waste on our lovely beaches!

These salmon could be raised on land without putting our ocean habitats at risk. Land based operations would create more jobs and contribute to the economy without putting oceans habitat and ocean jobs at risk. The open net pen operators would make fewer billions, but the benefit to our province would be better than it is with open pen model. **The provincial DFA could put their time and efforts towards supporting and promoting land-based operations instead of ocean based.**

Studies show that holding these fish in high densities will amplify the quantity of sea-lice, infestations, bacterial disease and viral outbreaks like Infectious Salmon Anemia (ISA). The users of the harbour and beaches know there are currently sea lice present. Huge numbers of salmon will increase the number of sea lice to a dangerous level. You can't cram that many animals into a small space without an increase in disease and pathogens. That is true for any kind of farm animal. At least with farms on land the chemicals and pesticides are regulated so not to spread through the whole neighborhood, like they will in the marine environment. The treatment of these sea lice will mean using pesticides in the feed/water and mechanical treatments. The pesticides are harmful to lobster larvae and other creatures. The mechanical treatments dump waste and sea lice back in the ocean.

I am opposed to large quantities of pesticides going in the ocean, even if it is done under the direction of a Veterinarian as part of their Farm Management Plan. Regardless of who authorizes or supervises the action, the outcome is still pesticides in the water. The lobster larvae are very vulnerable when floating on the surface in July and August. Will they be allowed to use chemical during these months? The lobster fishers float crates full of live lobster in their harbours from December to mid June. Will they be allowed to use chemicals during these months? That is 9 out of 12 months that chemical use could be devastating to fisheries in the harbour. Cooke knowingly dumped illegal pesticides (Cypermethrin) in the Bay of Fundy in the past (fined in 2013). They've proven they cannot be trusted to abide the law.

KCS/Cooke will claim they are having success using lumpfish to manage sea lice, but studies from around the world are now saying that lump fish are not working to control sea lice as expected. They have now just become propaganda for this industry, another species being exploited and inhumanely treated, dying by the millions trapped in those pens.

D) Oceanographic and Biophysical characteristics of the public waters

We do not have the strong tides that the Bay of Fundy has so the shallow waters of Liverpool Bay do not flush as well. This means that some fish waste, excess feed and chemicals will settle to the bottom. The currents disperse the rest of the waste and it will impact the wider surrounding area. They will for a long time move around the Bay, harming the natural habitat where they land and based on the prevailing winds/waves and tides eventually settle on Beach Meadows Beach and other important habitat! During storm events in the past, the fish farm cages have broken and parts have ended up on those same local beaches and shorelines. The characteristics/features of the shorelines take a lot

of beating during strong winds, high tides and hurricanes. When ice forms along the shore this will also damage the cages.

It seems **DFA is willing to conduct this big experiment** in our harbours for the benefit of foreign companies. In their application documents, KCS is making a lot of promises about how safe it will all be, how they don't treat for sea lice, how they don't use chemicals, how they have strong cages, how their fish don't escape and on and on. The issue is, we have no reason to trust them given their history. They have been charged and fined in the past for breaking rules in other jurisdictions.

When something goes wrong (escapes, lice treatment, disease) it is months, if not years, before information is posted publicly by Cooke or DFA. Bad practices will go on for months or years without regulation. **It is not possible for DFA to properly regulate an industry that it also heavily promotes.** How will they fix their problems? Will they actually do the monitoring of the water and sea floor? And what does that really tell us? If the fish waste moves from below the pens, it will still be there in Liverpool Bay for a long time. Their own staff have admitted to being told to take water samples "just outside the breakwater" instead of by the fish cages. All of the answers to my concerns are wrapped up somewhere in their "Farm Management Plan" that nobody gets to see.

A 370% increase in invasive, farmed fish, waste, sea lice and disease will be very different than that one fish farm that is there now and that's bad enough!!

We cannot trust that the environment of the harbour is their first priority. Profits are their first priority.

The community pays the biggest price when our marine habitats are damaged. When this big experiment fails it will be the local families and businesses that will pay the price. The fish farms may succeed and be profitable for Mr. Cooke, but they will not clean up the mess they leave behind. If the harbour and ecosystem are damaged it could take decades for it to recover. Just look along the shore to see what happened in Port Mouton Bay, it took years for that area to begin to recover from a smaller operation.

DFA is using our tax dollars to promote and protect the industry that will cause a decline of those very same tax dollars if our local wild fisheries are harmed. While DFO(federal) is mandated to protect fish and fish habitat, the DFA(provincial) is doing the opposite by promoting open pen finfish farms. This does not make sense to me. The cages are in the ocean and should be licensed and regulated by DFO, as they are in BC.

Queens County would welcome a zero-waste, land-based finfish operation, managed by a reputable company like Sustainable Blue or Cape d'Or Salmon.

This province is one of the last places that has nice, "clean and cold" water. That is why these companies want to come here, they have already polluted the rest of the places that have cool water and are getting kicked out of other countries.

Please do not allow our water to be poisoned with fish farm waste, disease and chemicals.

Thank you for carefully considering my objections to this Cooke/Kelly Cove Salmon expansion in Liverpool or in any community.

Yours truly,

(sent via email)

Janine H. Stewart

[REDACTED]
Plymouth, NS [REDACTED]
[REDACTED]
[REDACTED]

Cc MLA, Hon. Kim Masland Kim.maslandmla@gmail.com

Cc Premier, Hon. Tim Houston PREMIER@novascotia.ca

Cc Minister of DFA, Hon. Kent Smith MINDFA@novascotia.ca

Cc MP, Hon. Rick Perkins rick.perkins@parl.gc.ca

Cc Minister of DFO, Hon. Diane LeBouthillier DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca

Cc Minister of Environment, Hon. Tim Halman Minister.Environment@novascotia.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 6:56 pm, Feb 11, 2024

From: [Sandi Zinn](#)
To: [Aquaculture Review Board](#)
Subject: APPLICATION for AQ1205X, AQ1432, AQ1433
Date: February 11, 2024 12:19:28 PM

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Sandra Zinn
[REDACTED]
Liverpool, NS [REDACTED]
[REDACTED]

January 21, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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, NOVA SCOTIA.

I am a lifelong resident of Nova Scotia who has chosen to live in Liverpool in my retirement years. I have often heard of Nova Scotia being a 'HAVE-NOT PROVINCE'. This **NOT** been my experience. Nova Scotia has so much wealth in its natural beauty, pristine beaches, active fisheries and wonderful communities. I do not support the expansion of the open net fish farms described in the above mentioned application. I have no doubt that the approval of this application in Liverpool Bay would result in the destruction of what I, and many Nova Scotians and visitors, have worked so hard to preserve.

Re: NS Aquaculture & Lease Regulations - Section 3 - Factor 1: The Optimum

Use Of Marine Resources

We live in an enviable place and we must all treat it with respect. Nova Scotia Tourism and Culture has done an amazing job promoting the physical and visual beauty of our province. Why would another arm of our provincial government side with a huge corporation which does not respect our quality of life and livelihood? Kelly Cove Salmon Ltd. (KCSL) is only interested in their bottom line. **The bottom line for residents of Nova Scotia cannot be measured in dollars and cents.** Money will NOT successfully restore our natural marine resources. The few jobs offered to run a predominantly automated aquaculture facility will not restore the jobs lost in the tourism sector when effluent and garbage from the expansion of the existing aquaculture site increases. An over 400% increase in farmed fish will result in a 400% increase in effluent running directly into Liverpool Bay twice a day. Is there a plan in place for Kelly Cove Salmon Ltd. (KCSL) to restore the loss of lobster stocks due to fouling of our waters? Will they clean our beaches and waterways? Will they remedy the noise, odors, and light pollution that our residents and visitors will be subject to? Why would we give away the wealth of marine resources that we enjoy for anything less than what we already have?

The residents of Liverpool Bay area and other interested parties must have full disclosure on the following issues:

1. KCSL must have full transparency and disclose the exact number and type of jobs being offered in Queens County with the additions/expansions of AQ1205X, AQ1432, and AQ1433.
2. KCSL must disclose all environment studies they have performed previous to this current proposal to add/expand their aquaculture activities on our coast. KCSL must show us that they are good corporate citizens - otherwise they are not welcome here.

We are not, nor ever will be a 'HAVE NOT' province as long as we are willing to stand up and protect our wealth of resources.

This is not a good deal on many levels. Please speak up to help protect our province. Please take a stand with the people of Nova Scotia.

Sincerely

Sandra Zinn

Written Submission to: the Nova Scotia Aquaculture Review Board (ARB)

February 11, 202

From: The Association for the Preservation of the Eastern Shore (APES)

To: Nova Scotia Aquaculture Review Board aquaculture.board@novascotia.ca

cc. Honourable Kent Smith, NS Minister of Fisheries and Aquaculture
MINFA@novascotia.ca

We are writing in relation to applications currently before the Board: finfish aquaculture leases: AQ #1205, Coffin Island (boundary amendment); and AQ #1432, Brooklyn and, AQ 1433, Mersey Point, new leases/licences.

We wish to address aspects of three of the eight factors set out in the Fisheries and Coastal Resources Act in relation to these applications: (1) the **contribution of the proposed site expansion in Liverpool Bay to community and provincial economic development, community economic development in particular;** (2) **the optimum use of marine resources and,** (3) **the sustainability of wild salmon.**

We have reviewed the various documents posted on the ARB website supporting these applications including the technical review conducted as part of the Network Agency Consultation and have determined that these applications, if approved as submitted, will turn Liverpool Bay into a de facto Aquaculture Management Area shutting out other future economic and community uses of the bay and its entrance, as well as negatively affecting established lobster and other fisheries, tourism and recreational uses. DFO's identified Benthic Predicted Exposure Zones of the three sites taken together cover the entirety of the entrance to Liverpool Bay.

We are not assured from our review of the Network Agency Consultation that if the expansion were to be approved, the resulting regulatory controls on these operations will be enforced to the extent necessary to protect the marine environment for **other current and future non-aquaculture users**. The current amendment for Coffin Island now before the Board is in part due to non-compliance with regulatory boundaries since 2016.

We are concerned that the far field effects of these operations on the marine environment in particular will not be adequately mitigated nor monitored, and have no assurance that a precautionary approach will be taken. Letters of Advice from DFO are just that – advice, not requirements. Regulatory requirements will be incorporated into the Farm Management Plan for each site. However, these Plans are proprietary (not public) and only some of the monitoring data is made available to the public on an annual basis. Underlying this concern is the compliance history of this operator which is not encouraging.

DFO has requested that the proponent prioritize preventing farm salmon escapes given the potential damage to wild Atlantic salmon present in coastal waters in Southwestern Nova Scotia. For the past 5 years (2019 – 2023) the Federal Government has invested heavily through the Canada Nature Fund for Aquatic Species at Risk (CNFASAR) in the Watershed Assessment Towards Ecosystem Recovery (W.A.T.E.R) initiative. Three such projects on the South Shore focused on the LeHave, Medway and Petite Riviere Watersheds geared to recovery and protection of aquatic species at risk including the Southern Uplands population of Atlantic Salmon assessed by COSEWIC as Endangered since 2010. Four local organizations have been involved in this initiative: Coastal Action, Lunenburg; the La Have River Salmon Association, Bridgewater; the Medway River Salmon Association, Mill Village; and, the Queen’s County Fish and Game Association, Bridgewater. DFO has pointed out that the Medway and Mersey migration pathways are 10 to 14 km from Liverpool Bay.

Nonetheless, DFO has recommended that the proponent undertake measures to reduce the risk of containment breaches including both physical and bio containment. But a risk remains nonetheless on an endangered species for which extensive rehabilitation efforts have been made by governments and community-based environmental and angler organizations.

In addition, we would like to register our concern with the Board and the Department about how an “**interest**” in these aquaculture leasing decisions has been narrowly interpreted and will likely will be so again. APES did not make a formal application for intervener status in these hearings but we do have concerns we would like to register with the Board and Department about the process. We are fully aware that the first of these concerns, the definition of an

“interest” as defined in the 8 factors, falls under the legislative and policy purview of the Minister and Department of Fisheries and Aquaculture but we want to make our points nonetheless because it is in the **application** of law and regulation that fairness and community-based input to decision-making on sustainable economic development can be assessed. Will communities and established users of marine resources affected by the development project have as much say as commercial interests and governments which are both promoters and regulators?

We register concerns in two areas: (1) an overly rigid and excessively restrictive interpretation of “interest” as set out in the 8 factors in the legislation and ARB reference and (2) as applied in recent decisions of the Board regarding recent applications for intervener status in the Liverpool Bay expansion hearings.

The eight categories or “factors” set out in the legislation are intended to establish whether or not the group or individual applying for intervener status has a vested “interest” of some kind in the regulatory decision. We believe that the bar has been set too high in its interpretation by the ARB in decisions taken to date. We argue that community organizations such as ours requesting intervener status do have a legitimate “interest” in that each and every decision by the ARB sets a **precedent** for all future applications. That is our “interest” because future applications for other areas of the province will be largely determined by previous ARB decisions.

Our intent in registering these **parallel concerns for the Eastern Shore** is to demonstrate why we think we have a legitimate “interest” in these Liverpool Bay decisions because of future possible finfish aquaculture sites proposed for the Eastern Shore as announced recently in the trade publication Intrafish: “Scottish salmon farmer Loch Duart explores reopening Canada operations as profit more than doubles”, November 10, 2023.

We believe that that this company is being courted by the Department to return to the Eastern Shore to recommence operations on two existing leases, possibly more across the province. Our experience with Loch Duart and the regulator in dealing with cleanup obligations has been not been positive in that community vigilance taking months was required to ensure the regulators did their job to remove abandoned gear and other navigational hazards. Our concern is further

exacerbated that the ARB to date has excluded compliance history from previous ARB deliberations.

Our concerns also extend to recent ARB decisions **denying intervenor status** to bona fide community-based organizations including the Ecology Action Centre. For over 50 years, the EAC has accumulated much expertise and knowledge about the multi-product aquaculture industry and the environmental impact of finfish farms on the marine environment. Further, the EAC is an established centre of expertise on the environmental and community based impacts of finfish aquaculture on the marine environment. It has contributed substantively **at the invitation of government** at both levels with regard to aquaculture legislation and regulation including aspects of social licence, an essential component of the high value, low impact construct of the Doelle-Lahey recommended model. To exclude the EAC's contribution as an intervenor to the assessment of these leases is nearsighted in our view, at the expense of public confidence in the **impartiality** of the approval process for all forms of aquaculture.

Although the ARB has the authority to grant or deny intervenor status to applicants based on its interpretation of the Fisheries and Coastal Resources Act and regulations factors, that authority does not, in our opinion, extend in practice to discouraging the efforts of individuals or civil society groups, no matter where they live, from attempting to participate in the process for new uses of coastal waters which are a public, common property resource.

We hope that these observations and concerns will be received in the spirit in which they are offered, i.e. to contribute to a more positive, inclusive and informed consideration of community-based input to regulatory decisions involving new aquaculture developments of all types.

Respectively submitted,

Karen Traversy for

The Board of the Association for the Preservation of the Eastern Shore

[REDACTED]

[REDACTED]

Clam Bay, (Eastern Shore) NS [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:04 pm, Feb 11, 2024

NSARB-2023-001-WRT-089

February 10, 2024

Julius Reque

Port Medway, Nova Scotia

Email: Aquaculture.Board@novascotia.ca

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

To the Aquaculture Review Board and Clerk:

Re: The application by KELLY COVE SALMON 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

My name is Julius Reque and I've lived in Port Medway, NS for about 7 years. I am writing to express my strong opposition to the proposed expansion of fish farms in Liverpool Bay, Nova Scotia. As a concerned citizen and advocate for environmental conservation, my concerns relate most directly to Factors 1, 3 and 5.

Liverpool Bay is not just a body of water; it is a vital ecosystem that supports a diverse range of marine life and plays a crucial role in sustaining the health and balance of our coastal environment. The proposed expansion of fish farms poses significant threats to this delicate ecosystem, including increased pollution, habitat degradation, and the spread of diseases and parasites to wild fish populations.

I am deeply troubled by the potential negative impacts that such expansion could have on our precious marine ecosystem and the livelihoods of local fishermen. Small-scale, sustainable fishing practices have been the backbone of our coastal economy for generations, providing jobs and supporting local businesses. However, the industrialization of aquaculture threatens to

undermine these traditional livelihoods and disrupt the social fabric of our coastal communities.

I urge you to reconsider the expansion plans for fish farms in Liverpool Bay and instead prioritize the adoption of sustainable and responsible fishing practices that respect the delicate balance of our marine environment. This includes implementing stricter regulations on existing fish farming operations to minimize their environmental impact and investing in innovative aquaculture methods that prioritize the health of our oceans and the well-being of our communities.

In closing, I implore you to listen to the voices of concerned citizens like myself and take action to protect Liverpool Bay and its precious resources for future generations. Together, we can ensure a sustainable and thriving future for our coastal communities and the marine ecosystems that sustain them.

Thank you for considering my concerns.

Sincerely,

Julius Reque

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:08 pm, Feb 11, 2024

February 11, 2024

Patti Blimke

[REDACTED], Mersey Point, 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

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 strongly disagree with Kelly Cove Salmon Ltd. expanding and adding to the fish farms in Liverpool Bay!

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

I grew up in Brooklyn, NS and enjoyed swimming and boating in the harbour. Once retired, I moved home and purchased a condo on Beach Meadows Beach. I have seen first hand the garbage that comes from the fish farm. (bouys, styrofoam pieces, etc). One morning I was going to walk the beach and a whole pen has washed up on the beach. I wonder where all the fish went. Of course I took photos. Please do not allow this expansion. Our waters and shoreline should be protected for future generations to earn an income and enjoy clean beaches.

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;
- 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;
- d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;
- e) the other users of the public waters surrounding the proposed aquaculture operation;
- f) the public right of navigation;
- g) the sustainability of wild salmon;
- h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation;

This should be stopped before it goes any further. Help us protect Liverpool Bay.

Regards,

Patti Blimke

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:11 pm, Feb 11, 2024

From: [Janet nickerson](#)
To: [Aquaculture Review Board](#)
Subject: Registering my opposition to the fish farms in Liverpool
Date: February 11, 2024 5:41:38 PM

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Clerk of Nova Scotia Aquaculture Review Board

60 Research Drive
Bible Hill, NS B6L2R2

Jan 23, 2024

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.*

It is with great concern that I am writing today. I am concerned over the proposed new boundaries and new Finfish aquaculture license and leases by Kelly Cove Salmon LTD.

My family and I have a cottage in Beach Meadows and are building a house ([REDACTED]). I have an invested interest in the area and the local beach, as well as environmental issues.

Considering Section 3 d) Oceanographic and biophysical characteristics of public waters:

I am concerned about the pollution on the beach and the obstructed view from the shore, as well as the smell! The south shore is known for its beautiful shoreline and beaches. The shoreline and beaches need to be protected. This is Nova Scotia's biggest resource.

Considering Section 3 g) The sustainability of the wild salmon:

I have a family history of fishing wild salmon on the Margaree River. Wild salmon is an endangered species. I would be concerned about the parasites and diseases from the open penned-farmed salmon affecting the endangered wild salmon.

For these reasons, I oppose the proposed new boundaries and new Finfish aquaculture license and leases by Kelly Cove Salmon LTD.

Sincerely,

Janet Lynn Nickerson

[REDACTED], Brooklyn NS

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:13 pm, Feb 11, 2024

February 10, 2024

[REDACTED]
 Lunenburg NS 2C0

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

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.

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

I am opposed to any further expansion of finfish aquaculture in Liverpool Bay.

Factors I am addressing:

- #2 The contribution of the proposed operation to community and provincial economic development.
- #3 The other users of the public waters surrounding the proposed aquaculture operation.

Factor # 2

Our coastal communities are dependent on healthy harbours for the wild catch fisheries and tourism industries that sustain us. This issue must be addressed as part of the deliberation of the ARB. We have a renewable, fully sustainable fishery here (for over 300 years), and we live by strict regulations to ensure the fishery is maintained. We cannot take the risk of jeopardizing this important industry by expanding the open-net pen aquaculture industry in these waters.

We are also heavily dependent on the tourism industry on the South Shore of Nova Scotia: the coastal culture, the wooden boat tradition, the incredible beaches, the vibrant villages. Tourism exists because of the proximity of the ocean. If the ocean becomes uninhabitable, or at risk, or no longer a pleasant experience visually or otherwise, our economic viability is gone.

In 2019 alone, our seafood products brought in over 2 billion dollars. Revenues from our ocean-based tourism equals \$2.6 billion. So together, our seafood and tourism industries generate over \$4.6 billion per annum. This is revenue that stays in our rural coastal communities. Where would the revenue from an expanded aquaculture industry end up? Is there research to indicate the number of jobs that would be created?

A personal note: Although I live in Lunenburg County with many wonderful beaches, I have a particular fondness for Beach Meadows. It offers the quintessential Nova Scotia beach experience, and I make sure to get there at least once every summer. On my most recent trip there last fall, it was too cold to swim, but we went for a delightful walk, and took our thermos of coffee and sat on a blanket and looked out at the vast ocean. I can not imagine what it would be like to lose this experience. We cannot take that risk.

Factor # 3

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

- The optimum use of marine resources
- Fishery activities in the waters in the area of the proposed aquaculture operation
- Other users of the public waters: recreational and businesses
- The sustainability of wild salmon

Conclusion

It is clear that there is no social license to support this application for expansion. Residents of the neighbouring communities as well as from other parts of the province know that a massive industrial fish feedlot in Liverpool Bay is not sustainable. Please do the right thing and say 'no'.

Regards
Marion Moore

RECEIVED

By Nova Scotia Aquaculture Review Board at 7:16 pm, Feb 11, 2024

From: [Lyn Oakley](#)
To: [Aquaculture Review Board](#)
Subject: Application by Kelly Cove Salmon Ltd - AQ#1205x. AQ#1432. AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY
Date: February 11, 2024 6:01:14 PM

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ATTENTION: Nova Scotia Aquaculture Review Board

Lyn Oakley

[REDACTED] Brooklyn, NS [REDACTED]

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

I **object** to the granting of applications for Licenses and Leases in Liverpool Bay and the expansion of the existing site.

Under the Fisheries and Coastal Resource Act, and the Aquaculture License and Lease Regulations Section 3, I **object** on the following grounds:

- they do not make optimal use of marine resources
- will negatively impact local lobster fishery
- negatively impact the sustainability of wild salmon

On these grounds I object to the granting of the 3 licenses and leases noted above.

Lyn Oakley

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:38 am, Feb 12, 2024

St. Mary's Bay Protectors

[REDACTED]

Sandy Cove, Digby Neck

NS [REDACTED]

February 11, 2024

Nova Scotia Aquaculture Review Board
6th Floor, World Trade and Convention Centre
1800 Argyle Street
Halifax, NS B3J 2R5

Re: AQ 1205 (Coffin Island), AQ 1432 (Brooklyn) AQ 1433 (Mersey Point)

Written Submission from St. Mary's Bay Protectors
Sent via email to: aquaculture.board@novascotia.ca

February 11, 2024

In raising our concerns regarding the three above noted sites, located in Liverpool Bay, Nova Scotia, our organization will focus on the following factors:

1. the optimum use of marine resources.
2. the contribution of the proposed operation to the community and provincial economic development
3. the sustainability of wild salmon

Liverpool Bay, like most Nova Scotia coastal communities, has strong ties to its marine resources, and has had for as long as people have lived there; more than 400 years. Whether as a port, or for the marine resources which have supplied fishermen with their livelihoods, the waters of Liverpool Bay have benefited the economy of the broader community, both local and provincial. With the increase of farmed salmon production over the last 25+ years, full-time employment numbers in the industry have not kept pace, and part-time employment has decreased. The addition of new pens will displace fishers from their traditional areas, and would most assuredly result in the loss of jobs in the local area. The impact of the sewage and garbage produced from these operations - equivalent to the feces of 107,000 people deposited directly in to the Bay- ends up fouling the shoreline, impacting both residential and tourist development, and recreational use of the surrounding waters. Independent studies have also shown that the feces of farmed salmon has a significant effect on lobster catches around active salmon farms, further impacting the livelihood of fishers and the broader economy as a result. (Milewski, Inka et al Impact of Aquaculture on Lobster Catches, 2018)

Additionally, the increase in the number of open net pens, and the salmon contained within them, puts huge pressure on wild stocks to be processed into feed for them. Despite some improvements in this area in terms of developing other sources in the production of fish food for farmed salmon, the impact remains significant, reducing the amount of wild fish in the environment, further putting pressure on the wild fishery and the fish stocks fishers depend on.

Of further concern is the impact additional farmed salmon would have on the Wild Atlantic Salmon population which spawn in the Mersey River. With the increase in farmed salmon that is planned, the threat from increased numbers of sea lice to the endangered Wild Atlantic Salmon increases with every additional farmed fish.

“Over 40 First Nations and Indigenous communities fish Atlantic Salmon for food, social and ceremonial purposes, while salmon angling is a popular recreational activity for residents and visitors alike, promoting tourism and an appreciation for the natural beauty of Eastern Canada. **The species is crucial to the ecological, cultural and economic fabric of our coastal communities.**” (Engaging in a strategy to restore and rebuild Atlantic salmon - what we heard”, Minister’s Message, 2023)

Since the 1970’s, global wild salmon populations of Wild Atlantic Salmon have declined from 8-10 million to just 3 million today. Given the importance of salmon to our Indigenous and First Nations People of Nova Scotia, as well as to residents and visitors alike, and the Federal Department of Fisheries and Ocean’s efforts to support the restoration and rebuilding of this endangered species, this in and of itself ought to support the protection of our coastal bays from open net pen salmon farms. The sustainability of wild salmon and the presence of millions of farmed salmon in Liverpool Bay is a contradiction in terms, as has been realized and acted upon on Canada’s West Coast.

The pristine waters sounding the coast in this area have made Liverpool an attractive place to both live and visit. The additional salmon resulting from the boundary Amendment and the two new sites being proposed by Kelly Cove Salmon, a subsidiary of Cooke Aquaculture, in this shallow bay will have a huge impact on the waters and shoreline of the whole Bay. These pens are as close as 200m from the shoreline and endangered species zones, and within 300-500m of residential buildings, and environmentally significant wetlands, threatening property values, adding stress on protected wetlands.

St. Marys Bay Protectors believe that the optimum use of marine resources is that which is of most benefit to the local community. It is clear that the addition the proposed sites does not do that, with minimal employment benefits and substantial negative risk to jobs in the current fishery, tourism, recreation, and community development. Maintaining a prosperous, liveable community, attractive to both current residents and newcomers, is crucial in that it allows the community to offer the necessary services to keep them and attract others.

Thus St. Mary’s Bay Protectors believe that the continued operation and expansion of open net pen salmon farms in Liverpool Bay has a net negative impact on both the optimum use of our marine resources, and contributes negatively to the local community and provincial economic development.

Additional Comments

While Liverpool Bay is the focus of this review, SMBP does not support of the addition of **any** open net pen salmon fish farms in Nova Scotia’s coastal waters. We are **not** opposed to Aquaculture, where the species farmed pose no threat to other native species or to the environment, or where the farms are on land, as in the two RAS sites currently operating in Nova Scotia. RAS farms, run in a truly sustainable manner, are a world-wide trend. We could, and should be leaders in the development of truly sustainable aquaculture instead of followers.

Although not among the 8 Factors offered for response, St. Mary’s Bay Protectors has additional concerns regarding the ARB process, most notably the lack of Social Licence as a necessary element. Indeed, we have been waiting since 2015 for government to act fully on the recommendations from the Doelle-Lahey Report, particularly in areas regarding transparency, accountability, public engagement, and **Social Licence**.

As noted in section 3 of the Doelle - Lahey Report, Foundational Elements of the Regulatory Framework, section 3.2 the report describes Social Licence as, “... the informal permission that society or a segment

of society, such as a local community, does or does not give to an industry, an activity or a project. The relationship between social licence and formal regulation is complex. On the one hand, effective regulation can help to create, reinforce and sustain social licence. On the other hand, the presence or absence of social licence can be one of the key determinants of the effectiveness of regulation.

“Our conclusion is that the aquaculture industry in Nova Scotia, particularly marine-based salmon farming, has a social licence problem.⁴⁸ Fair or unfair, this reflects a perception that the industry is a significant polluter of the marine environment, using practices that are not sustainable for ecosystems, or the health of the fish that are farmed, or the wild fish or other aquatic life that comes into proximity with “open-net pens,” frequently called “feed lots” by their detractors.”

In our process, we heard polarized views on the question of social licence. From an industry perspective, the message sometimes seemed to be that social licence depends on industry and regulators staring down the unreasonable opposition and working with those in society who are prepared to have an open mind and to accept the facts. From an oppositional perspective, we sometimes were flatly told that no amount of regulation could solve the social licence problems of an inherently unsustainable industry. But from both perspectives, we also heard many more nuanced opinions that recognized the vital contribution that regulation could make in helping the industry’s social licence problem by helping the industry avoid or fix the problems it has encountered in the past.

Our conclusion is that for fin-fish aquaculture to develop in Nova Scotia, the social licence problem will have to be addressed. If the development of fin-fish aquaculture continues in the absence of improved social licence, there is a real possibility that the social licence of aquaculture in general may come into doubt. Already, we see some evidence of that happening. Our process leads us to the conclusion that the social licence problem is deeper than the ineffectiveness and non-responsiveness of the current regulatory framework. But it also leads us to conclude that the social licence issue cannot be addressed unless the effectiveness of the regulatory framework is significantly improved and is seen to be improved in visible and tangible ways.” Doelle, M., Lahey, W. A New Regulatory Framework for Low Impact/High Value Aquaculture, The Final report of the Independent Regulatory Review for Nova Scotia, (The Doelle-Lahey Panel), 2014

In the current regulatory review, again, this issue was not resolved.

With the looming implementation of The Coastal Classification System, which was also a recommendation from the 2014 Doelle Lahey Report, it is even more urgent that the issue of Social Licence be resolved appropriately, beforehand. The timing of the implementation of the Coastal Classification System, and the restart of ARB hearings, without Social Licence playing a key role is insulting. Government credibility teeters in the balance.

Gwen Wilson,
Chair, on behalf of,
St. Mary’s Bay Protectors
53 Old Post Road
Sandy Cove, Digby Neck
NS B0V 1E0

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:40 am, Feb 12, 2024

NSARB-2023-001-WRT-096

From: Mary MacIntosh
To: Aquaculture Review Board
Subject: 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#1205 AQ#1432 AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.
Date: February 11, 2024 11:25:32 PM

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Mary P MacIntosh
[REDACTED] Mersey Point
[REDACTED] Liverpool

Feb 11, 2024

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

Via e-mail Aquaculture.Board@novascotia.ca

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#1205, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.

Having moved to the Liverpool, Queens County area in August 1978, and aside from a four year relocation to live and work in Alberta, (while remaining property owners and property tax payers in Queens Co), as a long term resident of the area. I want to state that I am absolutely opposed to the ARB approving the expansion of the Kelly Cove Salmon Ltd on the above noted sites in Liverpool Bay.

Before we relocated to AB the Open Pen Fish farm was operational off Coffin Island. However, between the time we left in Aug 2012 and returned in Oct of 2016, the operation off Coffin Island, AQ#1205 had clearly expanded and was more visible as we drove along the shore road to go walk beautiful Beach Meadows Beach. Its expanded size was just as obvious as we drove from our home on Wharf Rock Road, out towards Moose Harbour, a favourite drive and harbour stop of ours. Site AQ1205 (Coffin Island site) has exceeded its approved boundaries and operators have subsequently chosen not to reduce it to approved limits. KCSL should not be allowed to expand and exceed their operations limits and agreements in Nova Scotia. KCS Ltd is not currently acting as good citizens of NS. NS Aquaculture License & Lease Regulations – Section 3 – Factor 8

As a long term resident and tax payer of Queens County and as former employee of the Liverpool Visitor Information Centre, I took pride and a lot of enjoyment in pointing out our areas beautiful points of interest, unique history and spectacular beaches, it is indeed discouraging to see these beaches being passed off as just another shoreline to be fouled with untreated fish waste, sea lice and fish farm operational debris. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

There is a real threat to tourism and the “clean” Nova Scotia brand. Considerable money is spent every year helping Nova Scotians, both municipal and private, retrofit and replace outdated sewage systems in their homes to reduce impact on our environment. We, as responsible Nova Scotians, have been doing our part to reduce our footprint and maintain the clean environment that we currently have. The current application, if approved, will create more pollution than the effluent output of 107,000 people through direct access to our pristine waters. This effluent will be washed into the inner Liverpool Harbour twice daily. Queens County has less than 11 000 residents, total. NS Aquaculture License & Lease Regulations – Section 3 – Factor 1

The Nova Scotia Species at Risk report lists 11 species of birds including the Piping Plover and Harlequin ducks inhabiting the Beach Meadows area. Also, within 250 meters of Coffin Island there is a provincial nature reserve. In addition, there is a 154 acre nature reserve managed by the Nova Scotia Nature Trust which falls within a 5 km radius of both proposed sites AQ1432 and AQ1433. It would be a clear conflict of interest for the NS Government to accept the application from KCSL while trying to maintain these protected natural areas. NS Aquaculture License & Lease Regulations – Section 3 – Factor 5

In conclusion, These proposed expansions are not a good fit for Liverpool Bay. In addition, I firmly feel open pen fish farms are not a good fit for Nova Scotia, even Atlantic Canada, anywhere.

I look forward to attending much of the ARB Hearings in Liverpool, and if not in person, will watch via live feed online. Thank you for reading my concerns.

Mary P. MacIntosh she/her
[REDACTED]
[REDACTED]
Liverpool NS
cell [REDACTED]
home [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:17 am, Feb 12, 2024



South Queens Chamber of Commerce
C/O Ashley Christian, President

██████████
Liverpool, NS ██████████

Clerk of the Nova Scotia Aquaculture Review Board
60 Research Drive, Bible Hill, NS
Email: Aquaculture.Board@novascotia.ca

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

To the ARB Clerk and Board,

The following letter in opposition to the proposed expansion of Kelly Cove Salmon Ltd in the Liverpool Bay. Our concerns relate to **Factor 2 - The contribution of the proposed operation to community and provincial economic development** as listed in Section 3 of the Aquaculture License and Lease Regulations.

The South Queens Chamber of Commerce (SQCC) represents 87 small businesses and individuals in the Liverpool Bay Area. Member businesses include Business, Financial, Family and Professional Services, Education, Real Estate, Legal, Hotel & Tourism, Entertainment and Music, Restaurant & Bars, Sports & Recreation, Retail, Construction, Beauty, Health & Wellness, Government and Not for Profit Organizations, Transportation, Publishing, Agriculture & Environmental Services, and Community Supporters.

The SQCC believes that should Kelly Cove Salmons proposed expansion in Liverpool Bay be approved that many of its member businesses will suffer negative economically affects. Our primary concern is the people, the existing businesses of Queens County and our most precious resource, Liverpool Bay... an environment and natural resource valued for fishing, tourism, recreation, health and clean air, water and beaches, and wild species ecosystems and nurseries. Only through the protection and preservation of these resources can we maintain our "way of life and livelihoods" that are otherwise threatened by the contaminations inherent to this industry.

In 2019, members of the SQCC had members vote (in favour or opposed) to "Open Pen Fish Farming in the Bay of Liverpool". 100% of those voting members voted "AGAINST" Open Pen Fish Farming in Liverpool Bay. See attached letter.

The viability of many of Liverpool's small businesses is dependent on tourism and new residents moving to the area. People are attracted to Liverpool (and Nova Scotia in general) in large part by our

beautiful and pristine coastlines. Recreational and eco-tourism are two of the fastest growing sectors of tourism. Liverpool's recent influx of new residents is for many, a quality life decision. Regulatory policy and decisions which do not value the health or protection of our marine ecosystems will quickly translate into fewer tourists, residents and lost revenues and a lower tax base.

While Kelly Cove Salmon (KCS) and the NS Department of Fisheries and Aquaculture would like us to believe that the expansion of open net pen fish farming (ONPFF) in Liverpool Bay will "create jobs"—we say this is an excuse to bring a polluting industry into our community. Any jobs to be created by this expansion are likely to be low paying jobs, of which there are ample available in Queens County. KCS claims to require an increase in salmon production to justify building a processing facility in NS. In the long term, there are no guarantees that these jobs would even stay in Nova Scotia, let alone Liverpool, especially with technological advances make it possible to feed fish by pushing a button from anywhere in the world.

In summary, KCS does not have the "Social License" to occupy Liverpool Bay. *Social License is a privilege granted by local stakeholders, allowing by a foreign entity the use of a shared resource only when they see a fair trade-off in social benefits, while acknowledging that there may be some environmental and quality of life cost and displacement of existing activities.* Social License must be factored into this equation. Access to and use of Liverpool Bay must be kept within the jurisdiction of the people of Queens County and not handed off to multi-national corporation without first prioritizing traditional and current uses by the people of our community.

We are asking you to do what is socially, environmentally and economically right for our community and reject this application.

Sincerely,



Ashley Christian
President, SQCC

cc:

Hon. Tim Houston, Nova Scotia Premier - Premier@novascotia.ca

Hon. Kim Masland, MLA Queens-Shelburne, Minister of Public Works - kim.maslandmla@gmail.com

Hon. Kent Smith, Minister of Fisheries & Aquaculture – mindfa@novascotia.ca

Darlene Norman, Mayor, Regional of Queens | dnorman@regionofqueens.com

June 13/2019

Re: Open Pen Fish Farming in the Bay of Liverpool



THO WHOM IT MAY CONCERN

Open Pen Fish Farming in the Bay of Liverpool has been a widely and vigorously discussed topic in South Queens lately. The board of the South Queens Chamber of Commerce (SQCC) was asked by several of its members to take a stand on this issue.

The Board of SQCC took the approach of sending out a questionnaire to all its members **if they are opposed or in favour of "Open Pen Fish Farming in the Bay of Liverpool"**

On behalf of the Board of South Queens Chamber of Commerce and all its members I am reporting the results of the anonymous survey:

100% of the returned votes of the members of the SQCC have cast their votes "AGAINST" Open Pen Fish Farming in the Bay of Liverpool.

Based on the results the SQCC is representing the will of our members by sharing these results and confirming that our members have voted against Open Pen Fish Farming in the Bay of Liverpool.

Thank you,

South Queens Chamber of Commerce

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:53 am, Feb 12, 2024

Michael Fralic
[REDACTED]

Brooklyn, Queens County
Nova Scotia, [REDACTED]

February 10, 2024

NOVA SCOTIA AQUACULTURE REVIEW BOARD

Applications by KELLY COVE SALMON LTD for A Boundary Amendment and Two new

FinFish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon (*Salmo salar*) –

AQ#1205x, AQ#1432, Aq#1433 in Liverpool Ba, Queens County.

Michael Joseph Fralic – as a private citizen and Raymond Alexander as a private citizen

Michael Joseph Fralic and Raymond Alexander would like to state the following:

- 1) We are making these opinions today as private citizens and not as president and vice president of the Medway River Salmon Association. The (MRSA) did not have an UpToDate meeting to discuss the current position of all MRSA members.
- 2) However, we will state that in prior meetings MRSA has supported the partnership with Kelly's Cove Salmon Ltd. The membership and Executive have given careful consideration to all the pros and cons to farm salmon aquaculture and the affects if has on the recovery of Wild Salmon populations in the Medway River watershed.
- 3) The Oceans of Nova Scotia are very important to all of us. But no one owns the ocean or the view. We have to enjoy, share and use the ocean for the betterment of all of us. Everyone can and should have a say – but it should be based on facts – not just personal wants or corporate wishes.
- 4) Our personal observations of public opinion of fish farming in Liverpool Bay has come down to one driving factor. Waterfront land owners looking at a fish farm – 365 days a year and they do not like it. There seems to be a belief that when you pay a high price for an ocean front lot – that you own and control the view as well. Homeowners, even go as far as trying to evict people from below the high tide line as they walk along the coast line. So of course, these people are going to be very interested in protecting “THEIR VIEW”.
- 5) So, next they look at the existing Liverpool Bay site area for environmental damage to the coast line in front of their properties. Including possible changes in the smell or noise or lights at night. They found nothing there so they keep digging for the issue that will eliminate the sea cages. Could it be Wild Salmon!!
- 6) So, now they would look at other areas where there are sea cages to see if they can find something environmental that happened. Now they are getting somewhere, there are lots of old reports, media blogs and some new data where they can find the doom and gloom that they

are looking for. Now they can spread the concern to more people and more politicians who are always looking for a voters cause to support. These passionate people must be right or why would they be so passionate. What is happening now locally at the original Liverpool Bay site and the current owners is the point that should be of concern. Where is the local evidence of all of these concerns – The proof must be there because the Salmon farm has been there for years. No one seems to find anything at the Liverpool Bay site – so they then say it will happen in the future.

- 7) Did anyone approach the aquaculture company for a tour of there facility and see first hand what is going on in the sea pens. They do not want to discuss their concerns directly with the aquaculture company. It is better to read reports and use their imagination. I have not heard of the anyone hiring their own independent divers to survey under the pens. Compare the data to the weekly, monthly reports that are required by Nova Scotia Department of Fisheries & Aquaculture and DFO. IS THERE UNACCEPTABLE DAMAGE TO THE SEABED!
Again, Find the proof and document it – or just maybe everything is okay.
- 8) Wild SALMON ARE KING – They are our passion – We want to see Wild Salmon recover. We have spent the last number of years trying to increase wild salmon populations. The decline of the salmon on the Southern uplands was in the mid eighties – the recreation fishery was shutdown in the eighties. This is even before or at the same time as the inter-bay of Fundy wild salmon collapse. There were very few if any Aquaculture farm salmon pens along the southern uplands’ rivers. So how did Farmed Salmon destroy the wild salmon stocks.
- 9) The field of wild salmon researcher experts is an interesting group. They make a life’s career doing research on all kinds of threats and issues related to the decline of our Wild Salmon populations. Water Quality, PH issues, migrant paths, Evasive species in the rivers, seals and ocean mortality, farmed salmon to say a few. I have observed that the Salmon Funding Committees are told the story that water quality on the watershed scale is what we need to understand and the wild salmon will come back. Adjust PH and the rivers will fill up again with wild salmon.
No action plans are presented at the conclusion of a major four year 3-million-dollar watershed study. The action plan is to come, I guess, but more years slip by. No sense of urgency. The bottom line is most of the funds are not going in the rivers for the wild salmon.
The lack of action plans by these Wild Salmon Research Experts will be as much of a reason for the extinction of wild salmon as any other issue. They tell everyone what not to do – but not what to do. There could be numerous Watershed and Fish enhancement projects done at the same time. Results monitored and adjustments made. It is a proven fact that there are low numbers and a few families of wild Salmon left in our rivers. If they survive and thrive because we have improved the PH or Water Quality that is great. However, if man protects some of these juvenile fish and lets them spawn – then we are messing up the genetics. We only have the genetic material that is left in the rivers to work with – until it is gone. The fun seems to be in the Research, publishing a report and add it to your list of accomplishments’. It is sad – because these “SALMON RESEARCH EXPERTS” could have a really positive impact on Wild

Salmon Recovery. They will have to find something else to study when the wild salmon are gone.

- 10) We have never heard of any escaped Farmed Salmon found in the Medway River or Mersey River. We spend a lot of time on the Medway River and we talk to a lot of people about salmon. It has never been brought up. Our guess is that if some farm salmon escape it only takes a minute or two until one of our many seals has him for lunch.
- 11) We also believe that the Aquaculture Industry wants to be part of the solution to Wild Salmon recovery not seen as the villain causing the decline. It is better to sit at the table and talk to them, you maybe surprised.
- 12) We believe that we need strong leadership in our Department of Fisheries and Oceans to develop and try scientifically based Wild Salmon enhancement projects. The funding can come from private, corporate and non-for-profit sources – the government has to form partnerships. DFO's role in properly using our ocean resources cannot be underestimated. Let them use their expertise to develop the right balance, for recreation, personal and commercial use.
- 13) Fundy National Park in New Brunswick has a successful ten-year sea cage smolt to Salmon grow out project. The project is run and sponsored by the Aquaculture Association. The goal to bring back Wild Salmon on the inter-bay of Fundy rivers in the Fundy National Park.

- 14) This is our personal opinions:

We want Wild Salmon to Recover in large quantities – our wish – our Dream.

We believe it is possible for fish farms to co-exist in our oceans and wild salmon to recover.

We understand that there has to be proper planning of sites, monitoring of the fish health, corrective action when and if necessary. Based on strict environmental concerns

We believe concerned citizens should be able to talk to these companies through proper channels. Voice concerns and be satisfied by the results.

We believe that Farmed Salmon takes the pressure off wild Salmon by being a source of food.

We believe that the expansion of the Liverpool Bay Aquaculture sites will not have any negative impact on the recovery of Wild Salmon populations in the Medway River.

We have spent the last number of years trying to enhance wild salmon populations.

If there is no direct increase in the existing wild salmon populations in our rivers, Salmon Farms are not going to cause the end to wild salmon, anymore than Water Quality studies and a lime dozer is going to save them. Unfortunately, it is only a matter of time I am afraid, if the right people do not actually do something, that Southern Uplands Wild salmon will be a thing of the past.

Respectfully Submitted

Respectfully Submitted

Michael Fralic

Raymond Alexander



February 12, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:57 am, Feb 12, 2024

Robin Johnston
[REDACTED]

Conquerall Mills, NS
[REDACTED]
[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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.

Hello,

I am writing to you to express that I believe approving this boundary amendment and addition of two new licenses will have an overall detrimental impact to Liverpool Bay and I do not believe they should be approved.

I would like to cite factor 5 “The other users of the public waters surrounding the proposed aquaculture operation” as the reason I do not believe this boundary amendment and addition of two new licenses should be approved. The increase of noise, activity, and impacts on the water quality will all have detrimental impacts on adjacent property owners, recreational sites, communities, First Nations territories, and birds, marine mammals, and other wildlife.

As stated above, I am writing to you to express that I believe approving this boundary amendment and addition of two new licenses will have an overall detrimental impact to Liverpool Bay and I do not believe they should be approved.

Sincerely,
Robin Johnston

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:08 am, Feb 12, 2024

From: [Sheri Harris](#)
To: [Aquaculture Review Board](#)
Subject: Letter of support
Date: February 12, 2024 10:23:18 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

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

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From: [REDACTED]
Date: February 12, 2024 at 9:03:55 AM EST
To: Aquaculture.Board@novascotia.ca
Subject: Letter Of Support

Bill Harris Transport limited
Seaway Fabrications Limited
Lunenburg Foundry(Division of Seaway)

[REDACTED]
Shelburne, NS

Phone: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

February 9th., 2024

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, in Liverpool Bay, Queens County.
AQ#1205x, AQ#1432, AQ#1433

Dear Madame Chair:

Please accept this letter as support for the above application.

We have worked with Kelly Cove Salmon for over 18 years. This affiliation and work relationship has enabled us to expand and provide full time employment to 40+ individuals.

Not only has this enabled us to expand and provide services to the aquaculture, marine, boat building and road construction industry in Nova Scotia. We are and continue to service all sectors of the marine industry throughout Nova Scotia.

If not for the initial chance meeting with Kelly Cove 19 years ago, I do not feel this growth and expansion would have come to fruition.

We have witnessed first hand Kelly Cove Salmon's commitment to the communities they operate in. They are the first to offer assistance and support when a community or resident is in need. This was evident during the Barrington Lake Wildfires when countless support people were sent to assist. Supplies, food, reefer trailers and specialized fire equipment were provided without being asked. They continue to support food banks, local charities and shoreline clean up, only to name a few of the ways they give back to Nova Scotia communities.

I had not planned to write anything as I honestly feel there are hidden agendas based on a few opinions of those who reside here seasonally or recently purchased properties. The issue for

me is aquaculture employs Nova Scotians and there are strict policies and guidelines in place to monitor it. Is it fair that our Premier gives his "personal opinion", knowing as our premier he has the media attention. Has he visited a site, talked to the workers or was his concern speaking on behalf of those "who could not make it here". My response to this is, those individuals have the same opportunity as I have. "Write a letter and have it submitted".

I am tired of the old myths and misconceptions that have been circulated for years. Even I fell pray to misinformation decades ago and at the encouragement of my father (a retired fisherman) educated myself and learned as much as I could regarding aquaculture.

Aquaculture is the future and contrary to what some may think it can be beneficial to not only our province but the world. Please don't tell me Nova Scotia is open for business as we continue to tie up expansions and opportunities with mountains of paperwork and allow groups with hidden agendas to determine what businesses thrive in Nova Scotia.

As stated previously, I have every confidence in the Nova Scotia Aquaculture Board and believe they have policies, guidelines and strict operating procedures to ensure aquaculture is conducted properly in Nova Scotia.

Thank you for taking the time to read my letter of support. I am growing weary of attending hearings and writing letters of support when the evidence speaks for itself.

Respectfully

Sherri Harris

Monday, February 12, 2024

RECEIVED

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

Karman Lippitt

[REDACTED]

Lunenburg County, Nova Scotia

Residential address:

[REDACTED]

London, Ontario [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

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.

Thank you for receiving my comment on the application for licenses and leases and on the proposed project. I am an island property owner in Lunenburg County, very close to the boundary of Queens County and adjacent to Liverpool Bay. The property has been owned by my family for 54 years. In my lifetime, of 52 years, I have witnessed substantial changes to the property and the ecosystem of which is a part. These changes include a recognizable loss of biodiversity and significant degradation of coastal and marine habitats in the area, including Liverpool Bay.

I have been and am extremely concerned, disappointed and disheartened about the development of finfish aquaculture in the region. As the owner of an island property, I accept a level of vulnerability and seasonal unpredictability. I accept that the processes of climate change are continuous and, at this point, unavoidable. And that we all have a responsibility to mitigate the destructive impacts of those changes. However, this project proposes planned large-scale infrastructure which will bring unavoidable pollution, destruction and disturbance of natural systems, that will negatively impact all species and habitats within the area of operations and well beyond. The infrastructure will impede navigation (for both humans and marine life), and will negatively impact non-commercial activities, including recreation and tourism. Sedimentation will affect water quality and reduce access to sunlight for marine vegetation, such as essential micro and macro algae. High levels of nutrients and pathogens, known to be present in this kind of operation, will affect native salmon populations, other fish and all marine species, throughout the entire food web. Negative effects will not be localized or limited to the farming lease.

These negative impacts will be, without a doubt, compounded and amplified by the ongoing coastal and marine processes of climate change. The proposed approach to finfish production has been very well researched, documented and, as a result, **banned** in other provinces of Canada, and in marine environments around the world, to protect them. I have often wondered how it has been and is still being allowed to continue here?! Nova Scotia has made some unpopular decisions to protect its resources, industries and communities, in the past. For that I have always been grateful.

N.S. has never been and is not now in a position to risk industries that sustain the economy or coastal communities. The lobster fishery and other marine primary production industries rely on a healthy ecosystem to support that production. I request that the Review Board reject this application and others like it in the future. I further request that the Review Board examine its role and consider very carefully the factors below with critical and informed eyes.

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

Factors to be considered in decisions related to marine aquaculture sites

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;**
- 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;**
- d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;**
- e) the other users of the public waters surrounding the proposed aquaculture operation;**
- f) the public right of navigation;**
- g) the sustainability of wild salmon;**
- h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation;**

I sincerely thank the Review Board for considering my comment on this application. I also strongly urge the Board, the Ministry of Fisheries and Aquaculture and all other responsible Federal, Provincial and Municipal parties to consider carefully the trajectory of coastal and marine production, development and protection in the province of Nova Scotia and in Canada.

Sincerely,

Karman Lippitt

[REDACTED]

Lunenburg County, N.S.

Residence:

[REDACTED]

London, Ontario [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:21 am, Feb 12, 2024

February 10, 2024

Christopher Foley

Monte Vista,

San Felipe

Baja California

Mexico

Email: Aquaculture.Board@novascotia.ca

Clerk of the Aquaculture Review Board

60 Research Drive

Bible Hill, NS

B6L 2R2

Dear Aquaculture Review Board:

Re: The application by KELLY COVE SALMON 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'm writing with my objections to the expansion of open net fish farms in Liverpool Bay.

Factor 5 - The other users of the public waters surrounding the proposed aquaculture operation.

As an eight year resident full time and currently a seasonal resident of nearby Port Medway, I often drive by the fish farms on my way to visit friends or travel to Beach Meadows Beach.

Depending on which way the wind is blowing, the smell from the fish farms can be terrible. The pollution (broken pipes, buoys, Styrofoam, fish waste and disease) washes up on the shore of this once pristine beach. I no longer want to bring my friends, who visit from out of province and out of country, there as it is no longer the pristine beach it used to be.

I fully support the removal of these existing fish feedlots to on land and strongly object to any expansion in Liverpool Bay or anywhere else in Nova Scotia.

Regards

Christopher Foley

RECEIVED

By Nova Scotia Aquaculture Review Board at 11:45 am, Feb 12, 2024

Feb 12, 2024

The Quarterdeck Resort and Port Mouton Bay Cottages

[REDACTED] Summerville Centre

Nova Scotia, [REDACTED]

Clerk of the Aquaculture Review Board

60 Research Drive

Bible Hill, NS

Email: Aquaculture.Board@novascotia.ca

To the Aquaculture Review Board and Clerk:

Re: The application by KELLY COVE SALMON 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

This letter expresses our opposition to the proposed expansion of open net pen fish farms in Liverpool Bay, Nova Scotia. Our comments relate to Regulatory **Factor 1** – The optimum use of marine resources, **Factor 2** – The contribution of the operation to community and provincial economic development, and **Factor 5** – The other users of the public waters surrounding the proposed aquaculture operations.

The Quarterdeck Resort has been a popular destination for locals and tourists for more than 85 years. Located on the spectacular, 1.5 km long pristine, Summerville Beach and situated on Port Mouton Bay. The Resort includes an ocean side restaurant and 65 individual accommodations including spacious beach villas, cozy shoreline rooms, modern lofts and a large 3 bedroom suite all steps from or overlooking the beach and Summerville Provincial Park. Additional guest amenities include an indoor and an outdoor pool, fitness center, sauna, hot tub rooms, a private movie theatre and conference meeting spaces for up to 150 guests.

In 2023, our group made another substantial investment in Queens County with the purchase of Port Mouton Bay Cottages.

Since our initial QD purchase in Dec 2013, we have made and continue to make substantial investments in and expansions to the Quarterdeck Resort. The Region of Queens Municipality, too, has invested considerable time and tax payer dollars rebranding Queens County as a destination for the lovers of nature, pristine beaches and coastlines. Their slogan, "Seek Nature's Rewards" attracts visitors keen to experience Nova Scotian hospitality, iconic lighthouses and fishing villages, and promotes healthy outdoor activities such as swimming, surfing, sailing, hiking, camping, beachcombing and sun bathing — totally inconsistent with industrial fish farms spoiling coastal views and polluting our oceans, beaches and shorelines.

Like Summerville Beach and Port Mouton Bay, Beach Meadows Beach is an important tourist draw to Queens County. Visitors to the Quarterdeck Resort often ask where else they should visit while in Queens and our recommendations always include Beach Meadows Beach. While there is only one fish farm there currently, the cumulative effects of the three larger proposed farms will surely cause irreparable harm to the area's reputation. With fish waste that may contain pesticides, antibiotics and who knows what else, in the waters and sometimes washing up on Beach Meadows Beach, how can we, in good conscience continue to promote it as a destination? This one unsightly, unhealthy fish farm proposal has the potential for serious negative effect on tourism and thus the economy of Queens County.

Like Port Mouton, Liverpool Bay is an important lobster fishing bay. Tourism and the lobster fishery are the two most important economic drivers in Queens County. Combined, these two industries directly employ 370 individuals (Stats Can 2021) and indirectly employ hundreds more. These are the two industries most at risk from finfish expansion in Liverpool Bay or any Nova Scotia bay. A lot to risk for the 20 jobs proposed by Cooke Aquaculture should this proposal be approved.

We fear If the Liverpool Bay applications are approved, a precedent for massive scale net-pen farms will be set. Were the provincial government to proceed to push this industry on more coastal communities, we will once again need to worry about the future health of Port Mouton Bay and Summerville Beach which, like Beach Meadows Beach, are downstream of the prevailing winds and longshore drift of a finfish farm lease. While the Spectacle Island site has not been stocked since 2012, to our great dismay — on March 12, 2020, The Nova Scotia Department of Fisheries and Aquaculture renewed Licence #0835 for 10 years, and the Lease for a period of 20 years — against the wishes of the local community and advice of scientific experts.

We ask you to reject these applications and ban this finfish industry in Nova Scotia waters for good. There are better ways to farm fish.

Sincerely,



Terry Whynot, President
The Quarterdeck Resorts Inc.

Hon. Tim Houston, Premier of Nova Scotia - Premier@novascotia.ca

Hon. Kim Masland, Minister of Public Works - mla@gmail.com

Hon. Kent Smith, Minister of Fisheries & Aquaculture - Mindfa@novascotia.ca

Hon. Rick Perkins - rick.perkins@parl.gc.ca

Mayor Darlene Norman - dnorman@regionofqueens.com

LaHave River Salmon Association

██████████
Bridgewater N.S.
██████████



To: The Clerk of the Nova Scotia Aquaculture Review Board

I am writing on behalf of the LaHave River Salmon Association, to express significant concern about 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. "Our comments and concerns relate to Factor 7 - The sustainability of wild salmon as listed in Section 3 of the Aquaculture License and Lease Regulations"

This project will result in additional domesticated Atlantic salmon being stocked in existing, newly approved, and pending cage sites, including in places where the industry is not currently present and the status of rare and threatened wild fish populations is unknown.

The salmon aquaculture industry has had severe negative effects on wild Atlantic salmon and the environment in Atlantic Canada. Peer-reviewed studies on escapes and interbreeding, and mass pollution events like the 2019 Mowi mass die-off are examples.

Everywhere open net-pen salmon aquaculture exists in Atlantic Canada, wild Atlantic salmon are considered threatened or endangered by the Committee on the Status of Endangered Wildlife in Canada, including the southern upland population found on the Southwest coast of Nova Scotia. This expansion will put more rivers, including the LaHave River, which has recently seen an increase in wild fish at risk of collapse and extirpation.

As an organization dedicated to the preservation of this iconic species, it is disturbing that the Review board is entraining the proliferation of a known threat to a threaten species. Hundreds of people in organization such as our own, dedicate an invaluable amount of time to enhancing wild Atlantic salmon stocks. A project like this undermines all of this effort.

We are urging you to not allow this expansion in Liverpool Bay.

Thank you for your time.

Jamie Mason
(President)



February 12, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 12:04 pm, Feb 12, 2024

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

Via Email: aquaculture.board@novascotia.ca

RE: The applications by KELLY COVE SALMON LTD., for a BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES for the cultivation of ATLANTIC SALMON (*Salmo salar*) - AQ#1205x, AQ#1432, AQ#1433, Liverpool Bay, Queens County

I am writing to convey our opposition to the above noted applications with respect to Sect. 3 of the Aquaculture licensing and lease regulations, relating to factors b, c d, e, f, including our personal experiences with impacts from the existing site #1205.

We are residents of the community of Beach Meadows in Brooklyn, Queens County where we own a home situated on 5 acres of oceanside property, it's been our full-time residence and place of work for over 12 years. The property abuts wetlands including a tidal salt water marsh behind Beach Meadows Beach and backs onto the sandy shoreline adjacent to the salt marsh and creek that flows into the open ocean.

Since we've lived here the existing Coffin Island site #1205 adjacent to the beach has crept in scale from 6 or 8 pens in 2012 to 14 pens currently plus a feeding barge now anchored full-time at the site, operating 24/7 including diesel generators. These now expanded operations extend beyond Kelly Cove Salmon's (KCS / Cooke Aquaculture) lease boundaries which took place without public notice or going through the regulatory approval process. KCS has been operating outside their lease boundaries since at least 2016 with no repercussions from DFA, allowing them to seek approval for this expansion after the fact, via this hearing.

In October 2018 when we learned of Cooke's plans to expand the Coffin Island site even larger to 20 net-pens *plus* add two new sites of 20 pens each and were alarmed and concerned about the combined amplified impacts of a four-fold increase in open net-pen operations knowing the waters are shallow and subject to severe storms, high winds and huge forceful waves.

After attending Cooke's public open house a few days later in November 2018, I left the event more concerned than before arriving. I then expressed these concerns with our Municipal Council in a presentation at a Council Meeting on Jan. 8, 2019. Below is an excerpt describing my interaction with members of Cooke's staff at the Open House:

COOKES STAFF CONFIRMED THAT WASTE & DISCHARGE FROM THE NET-PENS COULD BE DISPERSED ONTO BEACH MEADOWS BEACH.

“At Cooke Aquaculture's open house, I spoke with two of Cooke's biologists at length. I expressed my general disbelief at how close the sites are to shore, to the beach and the surrounding very shallow waters and questioned and continued to press them on the volume of feces, food waste, and their effect on the beach and shoreline. Their answers changed from “Oh no, no impact at all....to,, well,,,yes its possible there would be some impact. Separately the two different biologists each admitted, reluctantly, that **YES it is certainly possible that waste/discharge from the site could flow up to the beach and beyond**, one even illustrated on the map with her finger the direction/route waste would disperse, and unknowingly to her she was indicating it would flow straight towards the beach. They were both unaware that there was a beach here or where it was on their own map, (the beach wasn't labelled) myself and other attendees had to show them where the beach was located. Note these Biologists are responsible for recommending suitable net-pen sites.

Next at the open house I took the opportunity to discuss my concerns with Cooke's VP of Communication's, he was dismissive and laughed off my questions (and others). His first reaction to my concerns was, “What Beach?” proceeding to tell people net-pen farms were a tourist attraction.

I left the open house shocked at the lack of interest for our concerns, or awareness of their site's proximity to a public beach, **one of this region's and province's most valued assets.** “

My personal interaction with this company about their proposed expansion was not impressive and gave me little confidence in their intentions to responsibly address concerns or provide the critical and truthful information about their operations in the bay. In the nearly five and a half years since that Open House my impression hasn't improved and our concerns over their expansion plans have increased substantially as they have over the already expanded operation.

FACTOR d): The oceanographic and biophysical characteristics of the public waters & FACTOR e): Other users of the public waters surrounding the proposed aquaculture operation.

Since taking over the original small owner-operated fish farm site #1205, KCS has been consistently scaling it up to an industrial size operation, to a size drastically beyond in scale and impact from the original lease granted. It should not by default or grandfathering be considered a suitable location merely because there was already a finfish operation there. As we have both witnessed first hand with site #1205, the creep in size has also coincided with ever increasing levels of discharge, fouling of the beach and surrounding shoreline, noise and smell.

Our house was built in the mid 1800's and has been restored and maintained to maintain its original character, a fisherman's cottage. The land remains predominantly wild and natural. Historically the area was inhabited by fisherman and still is today, including ancestors of those same settlers whom we have the pleasure of being neighbours with and learning from their local knowledge. Our property abuts the tidal salt water marsh behind the beach dunes and the back of our property opens onto a sandy shoreline and creek which flows out to the open ocean and beach, accessible from our house via footpaths that date back to the property's original deeds. Ours is a property that includes and is surrounded by incredibly sensitive and significant wetlands and beach habitat that we have come attuned to and know quite well - by foot, by sight, by smell and by season. And although these lands span a distance reaching approx 2km away from the existing site #1205, they are not safe from the slimy sludge being discharged from it. Storm surges and high-high tides have become frequent, pushing overland water even farther inland while submerging much of the surrounding property.

For the past 12 years we've walked this shoreline and the beach daily, all year long. We've accumulated a large archive of photos taken during these walks. As time passed I've noticed changes to this environment, growing more significant in recent years. Every year signs of degradation are more evident. When the net-pens are stocked a brown orange slimy oily sludge constantly washes ashore, coating the sand and rocks and accumulating en masse in the beach creek and far up into the salt marsh which is home to so much precious coastal vegetation and wildlife.

Entire beds of sea grass have died off, two historic popular swimming holes are continuously filled with a disgusting slimy orange substance, green algae coats everything along the beach shore. What was lush and pristine, once clean and clear waters to our eyes 12 years ago, is now showing obvious signs of unnatural impacts.

The conditions were so awful throughout the spring and summer of 2022 and again in 2023, we no longer walk the beach shore on the east side of the creek without wearing rubber boots and must hose off the residue when we return home. Even walking the beach barefoot along the water's edge is avoided most days due to the slime rolling in (on both beaches). The slimy sludge appears consistently every time the winds are coming from the Southwest - a river of brown orange substance is visible on the water's surface flowing from the direction of the farm headed toward the beach, often a band of brown orange slime is visible along the crest of waves rolling onto the beach. Ultimately it all flows to the east end of the beach where it's carried up the creek channel into the salt marsh with the tide. That end of the main beach, at the mouth of the creek is also the most popular spot for beachgoers to spend a day especially kids, dogs or anyone who enjoys wading and drifting in the creek's current, the water is sandy, shallow and warm. An idyllic picture-postcard beach spot, minus the slime and industrial view.

It's devastating to see the condition of the beach, a GEM of this region and province, and alarming to see how far reaching the discharge is spreading. **And this from only the one 14 pen site.** Conditions were so bad the summer of 2022 I was sent a letter with photos to NS's Minister of Dept of Fisheries & Aquaculture, Min of Environment, Mayor of RQM, and our MLA,

inquiring if the slime was a result of treatments being used at the fish farm. Notably the site was almost 6 months past its typical grow out period, which could mean the fish were receiving treatments for lice or disease and so harvesting was restricted. There was no response or answers from anyone except the basic confirmation it was received. Within a week of sending the letter and photos, harvesting at site #1205 began. Restocked, the fouling returned equally as bad in 2023.

REFER TO SOME OF THOSE PHOTOS (30), each taken by us, at end of this letter.

Due to the obvious direction and location we see the discharge flowing from, and its presence consistently coinciding with the pens being stocked, we believe the point source of the slimy shoreline fouling to be net-pen site 1205. For reference, the discharge strongly resembles the substance seen floating in a net-pen salmon farm in a media photo below (Tassal, Tasmania). However if our assertions are wrong and the point source of the discharge is proven not to be the net-pen operations, our concerns still remain and the source needs to be identified and addressed. In turn it would bring to question the suitability of fish currently being raised in this environment. So with this image as reference, please review our photos attached.....



A reference net-pen salmon farm (Tasmania) with a brown orange slime on surface, resembling the slimy substance fouling our beach shoreline.

Continuing concerns related to FACTOR e) and d)

My experience as a resident who is and will be directly impacted by the proposed operations has demonstrated to me a disproportionate imbalance in the amount of precaution applied to

decisions on marine based finfish farms which have many real known potential hazards, compared to the strict regulations imposed on tax paying property owners when it comes to septic and sewage, height of a railing or, dictating your new upstairs doorway must be barrier free width - all in the name of precaution, safety, and equal consideration of others needs. Even for situations that don't or may not ever even exist.

We are deeply concerned about contamination and quality of these public waters. It seems an industrial feed lot less than 1/2 km from residential properties which dumps their waste (which can include pesticides, antibiotics, and disease infected fish), into open public waters abutting beaches and residential dwellings is not treated as a potential hazard.

For example in the Municipality of the Region of Halifax, they have a by-law that stipulates the following for AQUACULTURE INDUSTRIAL USES:

“No hatchery, tank, or processing operation over 3,000 f.t. shall be located less than 50 feet from any lot line,,,shall be at least 100 feet from any dwelling or potable water supply,,,,shall be not less than 1/2 mile from any Residential or Mixed use zone. “

The by-law implies there is known risk, they consider it unsafe or incompatible for these aquaculture operations to be in close proximity to residential dwellings or potable water sources. In contrast to what the HRM bylaw implies, here in Liverpool we have these open 'tanks' operations IN our public water. Waters used by beach goers, paddlers, swimmers, and fishers.

FACTOR b) The contribution of the proposed operation to the community and provincial economic development

Many of our neighbours are commercial fisherman in Liverpool Bay, we've experienced first hand the direct impact a thriving fishery has on the local economy, it has a domino effect on every other business in the area. After the Fishery, **Tourism and real estate are the biggest economic contributors of this area and the allure of the local traditional fishery is a major draw**, a selling feature for both of those sectors. Open net-pen fish farms on the other hand are a deterrent and can negatively impact all local businesses that rely on the attraction of a healthy bay, unspoiled scenic views and pristine beaches.

Nova Scotia real estate and tourism has been steadily increasing since 2012, especially over the past 5 years. Increases locally here are due to factors unrelated to any particular circumstance in Liverpool other than its in Nova Scotia and on the South Shore, its related to growing online exposure through social media, steeply increasing immigration, a housing affordability crisis, and ability to work remotely.

We've seen a large exodus from urban areas of the Country to the maritimes began during the pandemic. The South Shore has always been a major destination for tourism, retirement and seasonal home owners and that demand, already on the increase, soared since 2020. With technology, digitized documents, and high speed internet, over the past 10+ years the South

Shore and rural NS has also become a viable and appealing location to relocate for anyone who works from home and/or who operates online business. This has never been the case before. Rural Nova Scotia doesn't need fish farm jobs to survive. In choosing locations to relocate to or vacation in rural NS - the communities and bays **without fish farms** do and will experience higher real estate values/demand and their tourism numbers grow higher than those with fish farm. **Negative perceptions of fish farms have an impact. Perception is everything.** Even for Millennials and GenY who live on social media, photogenic tourism and dining locales drive their decisions.

Unlike traditional inshore fishing vessels and wharves, net-pen fish farms are perceived as unsightly polluting industrial feedlots. Effort is intentionally made to detract tourists and real estate buyer's attention away from them. In contrast the lobster and inshore fishery in Nova Scotia has a historical and enormously appealing reputation, their wharves, boats and gear is perceived as having maritime charm, character and is highly picturesque, frequently featured in tourism and real estate imagery for being quaint and quintessentially East Coast. It is a DRAW, as appealing as the pristine beaches and unspoiled coastline. Lobster and the lobster fishery are featured dominantly in NS tourism marketing. On the contrary net-pen fish farms are never promoted as a desirable scenic asset. Personally I've never seen Tourism NS or any tourism operator or realtor featuring the views of a net-pen fish farm especially associated with beaches or popular landmarks. From what I see, local tourism operators and Realtors keep all their marketing photos free of fish farms. Marketing is largely aimed at out of province/country buyers or tourists who wouldn't even know to ask about fish farms without a heads-up or prior experience, which is on the increase.

The reality is fish farms are a dirty secret, tourism operators and realtors avoid exposing them in order to be successful. Those that are booking vacations, road tripping to Beach Meadows Beach, or buying real estate are no different than the millions of consumers buying, ordering and eating that same farmed salmon. Convinced through marketing spin *Atlantic ocean farmed* must be a great and healthy thing. They're oblivious to how the fish are raised and the impacts. But once they know, they know. And once you see a fouled beach you don't unsee it, you don't forget, you likely don't return.

Cooke's and KCS's economic contribution to the community and province cannot be properly assessed without also factoring in all the public funding Cooke has received which totals in the 10's of millions to date, or, the thousands of hours in volunteer time, services, and funding the community has needed to raise to support Intervenor parties in participating in this ARB hearing and potential future appeals. An unwelcome proposal imposing a huge financial burden on the community to start with isn't a good first impression. For five years I have seen enormous volunteer hours and donations put towards preparing for this hearing, depleting the pool of available volunteer hours and donations that could go to other worthy and deserving causes in the region. For five years the community has been in limbo not knowing the future fate of the bay - ourselves and many others have been refraining from investing further in our properties, building new, or investing in starting a business here.

FACTOR c) Fisheries Activities in the public waters surrounding the proposed aquaculture site & FACTOR h) The sustainability of wild salmon

We are deeply concerned about the lack of protection for wild fish and their habitat.

Currently, reporting lice counts, escapes, or environmental assessments are not required of finfish farm operators. These leased marine sites and open ocean net-pens include wild fish that freely enter, swim through and exist *within* these pens and site boundaries, including herring, mackerel and lobster. Marine farmed fish are transported by boat. Escaped salmon from the pens are regarded as wild fish and cannot be retrieved or caught without a DFO issued license. By legal definitions within the Federal Fisheries Act these operation's activities and habitat are part of the FISHERY. It appears DFO is abdicating their responsibilities to protect wild fish, including the declining wild Atlantic salmon population, by allowing *others* to license and regulate these net pen operations. There is existing case law (Morton et Al v. Province of British Columbia) that DFO cannot delegate their powers to a Province, not by an MOU or any other means, however it seems not only is that the case here in Nova Scotia but that the Province in turn has delegated the responsibility to an independent review board with rotating members. We are unclear what jurisdictional power the ARB possess in order to approve the licensing of these fishery operations, operations that also must not breach the federal Fisheries Act? **It is concerning that a panel of 3 individuals, not employees of DFO or even DFA, have authority to grant approvals for fishery licenses in inshore public waters.**

The NS Fisheries and Coastal Resource Act (FCRA) defines finfish aquaculture as a "fishery resource". The federal Fisheries Act defines a fisheries resource as part of 'the Fishery'. It is my understanding (and generally that of others) that regulation of the Fishery and protection of wild fish is solely federal jurisdiction.

We are personally not anti-aquaculture and don't know anyone that is. We are opposed to massive scale industrial feedlots in inshore public waters, which equates to the privatization of a public resource. Allowing corporate owned multi-national finfish feedlots to operate in these shallow inshore waters is incompatible with and harmful to the local traditional fishery and wild species. It also seems to be in conflict with the intent of the inshore Maritimes fisheries law that local inshore fishery licenses are to be personally fished by license holders or their authorized substitutes.

The Federal Fisheries Act, Inshore Regulations under the Maritime Provinces Fishery Regulations (MPRC), enacted in 2019 by then DFO Minister Bernadette Jordan, states the goal of the Inshore Regulations is as follows:

"...to keep the benefits of an inshore license in the hands of independent core harvesters and maintain a separation between the fishing sector and other sectors."

Industrial scale multi-national corporate owned finfish farms are incompatible with and conflict with the local inshore owner operated fishery, and the laws intended to sustain this fishery.

The amplified risk of disease, pesticide use, excessive waste and increased nitrogen levels in shallow waters all threaten to harm critical habitat and health of the wild species.

The massive boundaries of the three finfish net-pen sites and their locations limit the percentage of available area for local fishers gear, navigation and fishing area.

SUMMARY

What we have learned in the past 5+ years has left us with no confidence or trust in the proponent to take interest or initiative to protect anything other than profits first. Their history of disregarding regulators and the law including criminal charges and pleading guilty to smuggling illegal chemicals across the U.S. border into Canada to use the chemicals in fish farm sites in the Bay of Fundy, killing thousands of lobsters as a result, is unforgettable and unforgivable. Showing no remorse whatsoever, while under investigations they continued to use the illegal chemicals and after pleading guilty the company acknowledged no wrong doing. In the past five years I have read news of Cooke's environmental performance in coastal communities around the world where they operate including; die offs and escapes in Maine, catastrophic net-pen failures in Washington state, high mortality rates in Scotland, widespread backlash in Tasmania, and Chile where they've been sanctioned for operating in restricted protected waters. Since I attended the Open House in 2018 the only pro-net-pen fish farm opinions I've encountered are those who work for or benefit financially from the operations. Certainly not the benchmark of an upstanding community minded corporate neighbour.

The quote below was part of a letter to Tassal stock holders warning of Cooke's takeover of the Tasmanian net-pen salmon producer..

"This is not a 'ma and pa' operation. Cooke Inc. is the family-owned empire you don't want in your waters or communities. Wherever Cooke Inc. operates – from North America to Chile to Scotland – communities, First Nations and local fisheries are struggling to coexist with salmon farming. Why? The public record for Cooke Inc. and their subsidiaries shows a long history of violations, environmental damage and a general disregard for regulations." (Emma Helversen, Wild Fish Conservancy, US.)

While the ARB may, inexplicably, be mandated to ignore a proponents history and past performance, its host community certainly won't, and shouldn't.

In our own region, there has been overwhelming opposition for the proposed plans dating back to the proponents initial scoping phase. Following their formal applications in March 2019 the South Queens Chamber of Commerce polled its members, 100% of the respondents were opposed to Cooke's expansion plans. The Region of Queens stated through a motion put forward in 2019 they are opposed to the expansion of net-pen operations in Liverpool Bay, again in 2023 an entirely new Council and Mayor stated their opposition and subsequently voted to apply for Intervenor status. The KMKNO representing Mi'kmaq of NS have expressed their strong opposition of the expansion in Liverpool bay within the ARB submissions for the Digby hearing in 2021, as noted in publicly posted documents.

Dating back to 2019 Queen's MLA, then opposition party, now serving as a Minister and House Leader for the provincial party has consistently voiced her opposition to the proposed expansion which no doubt contributed to her reelection in 2021.

With all of the opposition well known and publicized by stakeholders its baffling how this application made it this far in an approval process, advanced to an independent panel of three people for their final decision. Three individuals who likely have no local knowledge of Liverpool Bay or frankly, have no requirement to have any knowledge of the fishery or finfish operations. An application with this many Intervening stakeholders certainly makes you question why all the departmental agency's who green-lighted the application to this point - did so without any Municipal review and input. And knowing that Cooke Aquaculture sits on DFA Minister's Regulatory Review Committee providing input into how this regulatory process is structured - has not instilled public confidence in the process but rather, validates the signs of **industry biased and inequity** the community is experiencing. In every community around the world where Cooke installs net-pens citizens strongly oppose them and in many regions Cooke is suing their host government when decisions are not in their favour. The wisest decision is to not let them in the door in the first place.

Those with the local historical knowledge of Liverpool Bay have been excluded from input on the application up until this ARB hearing. As the first community ever to be subjected to this ARB approval process for new finfish farms, introduced in 2016, it indeed appears evident we've had an extremely flawed and industry-biased regulatory experiment imposed upon us. At our own expense. An application with this much opposition from stakeholders including; residents, business owners, indigenous and local fishers and both our municipal and provincial elected officials - should never have gotten this far. Additionally this week the Premier has shared his personal opinion of opposing this application.

Liverpool Bay is not suitable for the existing nor the proposed new open net-pen finish farms. We stand with everyone in our community who are opposing as Intervenor and support the opinions of all who've voiced opposition through written public submissions and including Nova Scotia's Premier Tim Houston. To ensure even the Premier's opinion is considered by this board, we submit his opinion as recorded and published by media below.

"I think some areas are great for aquaculture and I think that some others are maybe not the best place for it. On this specific question on Liverpool Bay [finfish farms],... I personally don't think Liverpool Bay is a suitable place for it," Houston said to applause. - Liverpool, Queens County.

Respectfully,

[REDACTED]

Carol & Mark Bernabei

[REDACTED]

Brooklyn, Nova Scotia [REDACTED]

[REDACTED]

Sea Grass - East Side of Creek: August 5, 2012



Sea Grass - East Side of Creek: August 13, 2022



Sea Grass - East Side of Creek: August 7, 2012



Sea Grass - East Side of Creek: August 27, 2022



Sea Grass - August 27,2022. Close up of Beach grass bed above, and area covered in slime





Swimming Hole: July 13, 2023. East Side of creek - opposite beach dunes



Swimming Hole: July 14, 2023



Swimming Hole: July 9th and July 22, 2022



SALT MARSH BEHIND FORMER CHURCH NOW A RESIDENCE: August 8, 2022



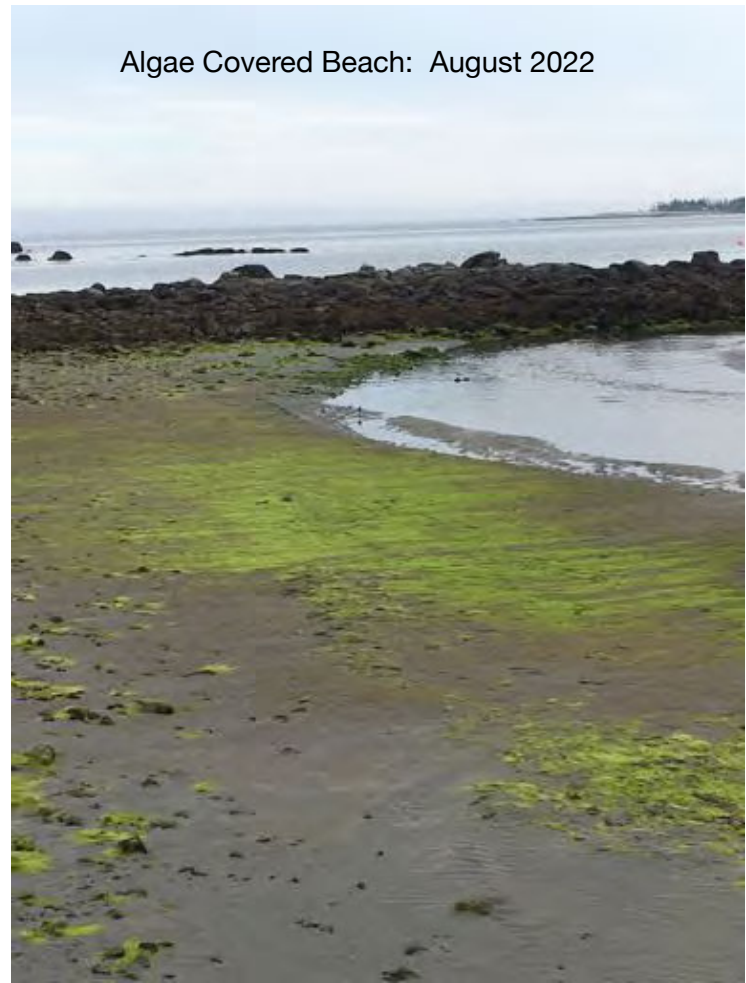
SALT MARSH BEHIND CHURCH HOUSE: August 2023 Same location as above
Note: This is within 100ft and 200 ft respectively of two residential wells.





ALGAE covered beach and rocks: August 13, 2022





Algae green waters at mouth of beach creek. This used to be crystal clear waters:
August 2022 above left
August 2023. right



SLIMEY WAVES: Beach Meadows Beach



BEACH MEADOWS MAIN BEACH: August 27, 2023





TOP: Beach Meadows
Beach August 27, 2023.

RIGHT: Fish Farm Buoy
washed up on Fish House
Point, at end of beach on
east side of creek. Rivers
of slime all around
the point. August 27, 2023



Swimming Hole & tidal salt marsh behind Beach Meadows Beach dunes: August 27, 2023





Beach East Side of Creek: May 2023



Beach East Side of Creek: August 19, 2023



EAST SIDE OF Beach Creek: May 2023



WHAT'S WRONG THIS PICTURE



The above photo was taken from the same location as most of the preceeding photos.
August 2022.

February 12, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:14 pm, Feb 12, 2024

██████████
Brooklyn, 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

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.

To whom it may concern,

I am submitting this letter in opposition of the proposed Kelly Cove Salmon Ltd. expansion application.

The impact of this application on the tourism development and hospitality management sector of Nova Scotia's economy pertains vitally to Section 3 factors to be considered in decisions related to marine aquaculture sites, specifically:

- e) the other users of the public waters surrounding the proposed aquaculture operation; and
- f) the public right of navigation.

My education and career experience are in tourism development and hospitality management. I am originally from Nova Scotia and have recently returned to the Liverpool area after living in Western Canada for 15 years. The Rockies and prairie lands are a gorgeous part of our country but they don't hold a candle to the Queen's County coastline.

Nova Scotia's South Shore is famous the world over for its stunning panoramas and beaches that rival any exotic tropical island. There are likely few tourists who are looking to visit Canada's Ocean Playground that are interested in seeing open pen farming operations when they're paddling a kayak, hiking a seaside trail, or swimming a few salty laps. A view marred by protruding nets, patrol vessels, and required night/inclement weather navigation lighting is a disappointing blight on our archetypal scenery – and that's only what we see above the water's surface.

The opinions and experiences of travelers who do visit and witness this will be shared with others upon return to their home provinces and countries, discouraging potential visitors who will instead seek alternate destinations to spend their hard-earned discretionary income – the revenue source that is the lifeline of our small communities. In addition, the influence and reach of internationally renowned musicians who perform right here in Brooklyn and Liverpool and many Hollywood productions filmed in the province should not be understated.

As these farms continue to find opposition in national and international waters, they close up shop and move to where there is little to no resistance, in mostly rural communities that have few resources to

fight multi-national corporations promising community funding and job opportunities. In fact, this particular proposed expansion suggests only 20 local jobs will be created, and 2 remote positions.

Comparably, in 2019, Nova Scotia provincial statistics reported that over 47,000 people were employed in the tourism industry, welcoming over 1,584,000 visitors who contributed revenues of \$2.6 billion to the province. We cannot continue to grow our tourism sector sustainably if there is not a product to sell to leisure, adventure, and business travel markets. Tourism and hospitality operators in the Queens area are reliant on these external sources of revenue to survive.

The very basics of tourism development are to assess capacity using physical, economic, ecological, perceptual, sociocultural, and political/administrative indicators. Ecotourism in particular, stimulates area conservation.

We have the golden opportunity in front of us right now to learn from open pen disasters and hindsight experienced in other jurisdictions before it costs more money, time, and precious natural resources to correct. We need only look to the Discovery Islands, British Columbia, the Magallanes regions of Chile, Patreksfjörður, Iceland, and Puget Sound near Seattle, Washington USA – sadly, this names just a few.

Visitors considering Nova Scotia as a destination already face a significant price barrier by having to pay big bucks on airfare just to get here – it's less expensive to fly from Calgary to Hawaii for a two-week vacation, for example, than it is to fly to Nova Scotia for one week. I've lost count of how many people I've met who say they'd love to visit the East Coast but when weighing their holiday budget options, they get more for less elsewhere. For each one of those potential visitors who are attracted to our province for its iconic scenery, lifestyle, and history, I'm willing to bet not one would be overjoyed to spend their cash to kayak, surf, cruise, or swim in turbid waters infested with excess feces produced by 1.8 million salmon unnaturally inhabiting these coastal waters (by comparison, this translates into the raw sewage of 107,000 humans in Liverpool Bay...the population of the entire Region of Queens is only 10,425).

Exponential expansion brings exponential consequences. This application is not a viable business model that can successfully scale in an aquatic environment, where risk factors can only be mitigated on paper. Once a breach of pen structures, netting, chemical and feed leaching, increase in sea lice, or escape of salmon stock occurs, our pristine coastlines – the very marketing tool that attracts visitors, residents, and businesses to the region - will be altered forever with no recourse or industry recovery. There are, however, alternatives to expanding open net fish farms that can be explored (for example, land-based solutions do already successfully exist).

A recent quote from a consulting firm said to have conducted a study on the impacts of aquaculture on tourism, notes: "Nova Scotians tend to view aquaculture positively. While there are segments among residents and tourism industry membership that are not supportive of aquaculture, little evidence was found through extensive research conducted as part of this study to support the claim that aquaculture adversely impacts tourism." As a tourism development professional, I'm quite curious as to the research methodology, data modeling, and projections used to reach this conclusion. Without this information, this broad statement is at best dangerously assumptive, and at worst baseless, and inherently and patently false.

In defense of our precious natural resources, there is already strong collective disapproval of the application by tourism associations, local businesses, residents, environmental groups and scientists, and municipal and provincial government leaders. If we continue to put the cart before the horse, we'll be assessing tourism impacts post mortem style, and irrevocable damage will have already been done.

I implore you to reject this application. We are looking to the ARB, as an independent adjudicator, to do the right thing for our environment, economy, tourism, and quality of life. If this application is not rejected, there is no turning back. Your decision has the direct ability and duty to stop the socialization of risk for privatization of profit.

Regards,
Angela Blenkhorne

cc: Mayor Darlene Norman (dnorman@regionofqueens.com)
MLA Kim Masland (kim.maslandmla@gmail.com)

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:26 pm, Feb 12, 2024

February 12, 2024

Ronald Neufeld

Medicine Hat, AB

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

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.

The applications should be denied. Open-net-pens like those used by Kelly Cove Salmon Ltd. are causing harm to the ocean and potentially to other fisheries and wild salmon.

Plastic and the chemicals it releases have been proven to cause harm. Here is a science report on the effects of micro plastics on lobster.

<https://www.sciencedirect.com/science/article/pii/S0025326X20303982?via=ihub>

Attached below is the news release for the report.

As a former resident of Shelburne County I have first hand knowledge of the effects open-net cage sites have on the ocean and the shore. I would visit West Green Harbour after a storm and find the shore littered with ropes, plastic pipes and plastic buoys from site 1358. I have found large buoys from the site that have broken open and spilled their white crumbly styrofoam between the rocks, pieces too small to be picked up and that would end up being washed into the ocean.

Kelly Cove Salmon Ltd. is also directly responsible for plastic entering the ocean. When repairing cages they cut the thick plastic pipes, on the shore or on an open barge, with a chain saw. The plastic pieces then go into the ocean. When scientists and governments around the world are saying we have to stop putting plastics into the oceans, what this company is doing is irresponsible and the company should not be allowed to operate anywhere near the ocean.

Sincerely,
Ron Neufeld

NEWS RELEASE 7-JUL-2020

Microplastic pollution harms lobster larvae, study finds

Microplastic fibers in the ocean impact larval lobsters at each stage of their development

B GELOW LABORATORY FOR OCEAN SCIENCES

Microplastic fiber pollution in the ocean impacts larval lobsters at each stage of their development, according to new research. A study published in the *Marine Pollution Bulletin* reports that the fibers affect the animals' feeding and respiration, and they could even prevent some larvae from reaching adulthood.

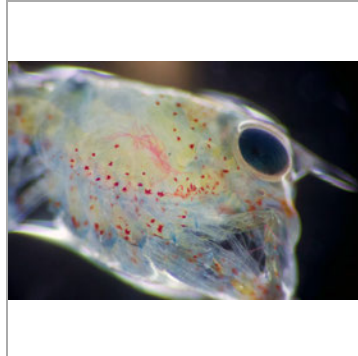
"In today's ocean, organisms are exposed to so many environmental factors that affect how many make it to the next stage of life," said Paty Matra, a study author and senior research scientist at BGELOW Laboratory for Ocean Sciences. "Lobsters play a fundamental role in the Gulf of Maine ecosystem as well as the state's economy, and it's important that we understand how pollutants impact their development."

Young lobsters grow to adulthood through four distinct developmental stages, and the researchers found that the physiology of each stage determined how the animals interacted with plastic fibers. The youngest lobsters didn't consume them, but they were plagued by fibers accumulating under the shells that protect the gills. In experiments where the larvae were exposed to high levels of fibers, the youngest larvae were the easiest to survive.

More mobile and agile, the older lobster larvae did not accumulate fibers under their shells, but they digested the particles and kept them in the digestive systems. This could be problematic for lobster larvae coming of age in the ocean. Fresh plastic often leaches chemicals, and the residues can foster potentially toxic sea life.

"Plastic particles have been found in almost every animal in the ocean," said David Fieds, another study author and senior research scientist at BGELOW Laboratory. "If an animal can't fit something in its tiny little pipe, it's probably going to land and that can have repercussions for the animal and potentially for the food web."

Microplastic fibers enter the ocean from sources including wastewater, and they can also be created in the ocean as larger materials degrade. Plastics tend to float at the surface, where they are exposed to sunlight and wave action that eventually breaks them down into smaller particles.



MAGE: ACCUMULATION OF MICROPLASTIC FIBERS IN LARVAL LOBSTERS. A PHOTOGRAPH SHOWS THAT MICROPLASTIC FIBERS ACCUMULATE UNDER THE SHELLS OF LARVAL LOBSTERS. [view more >](#)

CREDIT: MADDY WOODS

Media Contact

Severina
severina@bgeow.org
207-352-567 x 03

@BGELOW

<http://www.bgeow.org>

From: [Tisha Pratt](#)
To: [Aquaculture Review Board](#)
Subject: Expansion of Open Pen Fish Farms
Date: February 12, 2024 1:21:44 PM

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:30 pm, Feb 12, 2024

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

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To the Aquaculture Review Board:

Now that Cookes Aquaculture is asking to expand their open pen farms in Liverpool Bay, it would be a good time for Nova Scotia to catch up to British Columbia and other responsible parts of the world by moving all Fish farms to land based operations.

The downside of open pen farming is already well documented,

- 1) they certainly do not make best use of our best and finite resource- the coastline
- 2& 3) they contribute far more to the Cookes business than they do anyone else and land based fish farms would contribute more to the community as it would not only provide jobs but allow the ocean to remain a healthy resource as opposed to crowding out the lobster and tourist industries.
- 4) The fish farms contaminate water with excrement, wasted feed and very often dead fish are just left in the water.
- 5 & 6) the proposed expansion will make it impossible for people to sail out of Liverpool Bay and for the Coast Guard to navigate the shorelines; thereby increasing use of fossil fuels and pollution from using motors. Not to mention extra pollution from the increase in boat traffic needed to feed the fish.
- 7) Wild Salmon BC was instrumental in getting open pen farms on BC coast moved onto land based fish farms- for a reason. Also the NS Salmon Association has much information but I am sure ARB has done their due diligence and researched this already.
- 8) One open pen farm is already too many, I fail to see how increasing the number would improve conditions for either the fish in the pens, the fish and birds around the pens or the residents and tourists.

My main concern, however, is the actual fish in the pens and their treatment. Nova Scotia is the only Atlantic province that does not reference the Codes of Practice for Farmed Animals which makes it very easy for existing Fish farms in Nova Scotia to be negligent and inhumane in their operations.

The standards for transport of fish from the hatcheries to the open pens does fall under Federal jurisdiction, though are not likely well enforced.

If the Federal Government were to take over Atlantic Fish Farming as they already have in BC, and if NS implemented **National Farm Animal Care Council** (NFACC) Codes of Practice for Farmed Animals, it would be a big step forward for Canada's reputation as a humane and progressive country. The freshwater hatcheries could be in close proximity to the saltwater tanks, minimizing stress of transporting fish. We already have a model of sustainable clean and profitable fish farming here in Nova Scotia at Sustainable Blue. It is well past time that a huge international business like Cookes invested in the future of the planet and developed land based fish farms while phasing out the inhumane, disease ridden and filthy practice of open pen farming

that is crowding out wild fish , lobsters and tourists!

Thank you,

Tisha Pratt

[REDACTED]

Liverpool NS [REDACTED]

From: [Matt Dort](#)
To: [Aquaculture Review Board](#)
Subject: I am opposed to the Kelly Cove Salmon Ltd Expansion
Date: February 12, 2024 1:42:51 PM

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:34 pm, Feb 12, 2024

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

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To: The Clerk of the Nova Scotia Aquaculture Review Board

My name is Matt Dort. I am from New Glasgow, NS. I am a wild Atlantic Salmon conservationist and have spent decades advocating for their well being.

I am writing to express significant concern about 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 (AQ#1205x, AQ#1432, AQ#1433) in Liverpool Bay, Queens County.

I completely agree with our Premiere, the honorable Tim Houston, that this expansion should not happen in this area for many reasons.

Nova Scotians do not want this expansion to proceed. There is significant opposition that exists in this province against the salmon aquaculture industry. [The Doelle-Lahey report](#) from 2014 demonstrates significant concerns from the public about marine-based fin-fish aquaculture and the potential growth and expansion in the province. Throughout various public opinion forums, there were numerous calls for an end to marine-based aquaculture and significant support for limiting fin-fish aquaculture to land-based facilities.

Broad opposition emerged in 2020 when the Norwegian Aquaculture company, Cermaq, wanted to expand into 5 sites across Nova Scotia. There was public outcry across the province. The primary concerns expressed at this point were the industry's impacts on lobster fishing and other fisheries and the pollution associated with these sites.

Despite tens of thousands of Nova Scotians speaking up vehemently against this industry, your board is narrowly reviewing the application from this company. Confronted with all this evidence showing the public's cries for no expansion, how could you consider allowing this expansion to proceed? This company in particular has continuously made one bad choice after another; from poisoning the ocean with cypermethrin, a pesticide that is banned in Canada and kills several marine species, putting other's livelihoods in jeopardy, to using European genes in their breeding even though it is illegal to import and release non-native fish species. Why would we allow them to continue?

This expansion is of particular concern to our organization, given that the *DFO Maritimes Region Science Review of the Proposed Marine Finfish Aquaculture Boundary Amendment and New Sites, Liverpool Bay, Queens County, Nova Scotia* report cites that aquaculture escapees have been found in rivers at distances of up to 200–300 km from the nearest aquaculture site (Morris et al. 2008). The proposed leases fall within the range of the Southern Uplands (SU) wild Atlantic Salmon population. This population of Atlantic Salmon is designated as critically low, classified as Endangered by COSEWIC since 2010. The SU salmon population is deemed biologically unique, and its extinction would result in an irreparable loss of Atlantic Salmon biodiversity (Gibson et al. 2011).

Studies indicate that open net-pen salmon aquaculture has profound effects on wild Atlantic salmon through various pathways, including the escape and interbreeding of domestic salmon with wild populations, proliferation of sea lice on salmon farms transmitted to wild salmon, and the spread of diseases and pathogens from farms to wild salmon. These impacts have been linked to significant declines in wild salmon populations. Research conducted by scientists at Dalhousie University has shown that salmon farming is associated with a reduction in survival or abundance of wild Atlantic salmon and sea trout populations by more than 50% per generation on average (Ford and Myers 2008).

Escapes from aquaculture sites pose a significant and ongoing threat to the genetic fitness of wild Atlantic salmon populations (Forseth et al. 2017, Bradbury et al. 2020b, Glover et al. 2020), with documented occurrences in Atlantic Canada and beyond (Glover et al. 2017, Keyser et al. 2018, Diserud et al. 2019). Recent genetic studies have confirmed widespread hybridization between wild salmon and escapees, particularly notable in regions like Norway (Karlsson et al. 2016) and Newfoundland (Sylvester et al. 2019, Wringe et al. 2018). These interactions can span large areas and escapees can constitute a significant portion of a population's annual production (Glover et al. 2013, Glover et al. 2017, Heino et al. 2015, Sylvester et al. 2018, Wringe et al. 2018) and can lead to decreased survival of hybrids, with population declines and loss of genetic diversity likely (Fleming et al. 2000, McGinnity et al. 2003, Sylvester et al. 2019) as indicated by both experimental studies and modeling when escapees exceed 10% of the wild population annually (Castellani et al. 2015, 2018, Sylvester et al. 2019, Bradbury et al. 2020). The industry is only required to report and provide details when escapes of more than 50 fish occur. To put the dangers of unreported escapes into perspective, if there are even two unrelated incidents of 40 fish each, a wild population of under 1000 wild fish will suffer.

Domestic fish in aquaculture operations can contract diseases and sea lice infestations from nearby farmed fish (Kristoffersen et al. 2013, Frazer et al. 2012), posing significant health risks to both farmed and wild populations, especially when host density reaches certain threshold levels (Krkošek 2010). Although pest control products have not been used at the existing site in Liverpool Bay since 2015, the abundance of sea lice remains unknown. Introducing farmed

fish into an area is likely to exacerbate the prevalence of pathogens and pests due to the higher number of host fish, which is particularly harmful when smolts migrate to the ocean in the Spring, passing through an elevated abundance of sea lice.

Everywhere open net-pen salmon aquaculture exists in Atlantic Canada, wild Atlantic salmon are considered threatened or endangered by the Committee on the Status of Endangered Wildlife in Canada, including the southern upland population found on the Southwest coast of Nova Scotia. This project poses a significant threat to the already endangered Southern Uplands wild Atlantic Salmon population. Time and time again, we see that Nova Scotians are opposed to these projects; this is no different. I urge you to prevent this expansion in Liverpool Bay from proceeding.

Thank you for your attention to this critical issue.

Sincerely,

Matt Dort
New Glasgow, NS

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To: The Clerk of the Nova Scotia Aquaculture Review Board

The Margaree Salmon Association is a volunteer non-profit organization dedicated to conservation, protection, and enhancement of Atlantic salmon and their habitats. We have worked diligently for over 42 years in our watershed to further conservation of Atlantic salmon. We do not wish to see our hard work and dedication be erased by the troubling prospect of expansion of net-pen aquaculture in our waters.

I am writing to express significant concern about 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 (AQ#1205x, AQ#1432, AQ#1433) in Liverpool Bay, Queens County. Our comments in this letter relate to Factor 7: *The sustainability of wild salmon* as listed in Section 3 of the Aquaculture License and Lease regulations.

Nova Scotians do not want this expansion to proceed. There is significant opposition that exists in this province against the salmon aquaculture industry. [The Doelle-Lahey report](#) from 2014 demonstrates significant concerns from the public about marine-based fin-fish aquaculture and the potential growth and expansion in the province. Throughout various public opinion forums, there were numerous calls for an end to marine-based aquaculture and significant support for limiting fin-fish aquaculture to land-based facilities.

Broad opposition emerged in 2020 when the Norwegian Aquaculture company, Cermaq, wanted to expand into 5 sites across Nova Scotia. There was public outcry across the province. The primary concerns expressed at this point were the industry's impacts on lobster fishing and other fisheries and the pollution associated with these sites.

Despite tens of thousands of Nova Scotians speaking up vehemently against this industry, your board is narrowly reviewing the application from this company. Confronted with all this evidence showing the public's cries for no expansion, how could you consider allowing this expansion to proceed? This company in particular has continuously made one bad choice after another; from poisoning the ocean with cypermethrin, a pesticide that is banned in Canada and kills several marine species, putting other's livelihoods in jeopardy, to using European genes in their breeding even though it is illegal to import and release non-native fish species. Why would we allow them to continue?

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populations, proliferation of sea lice on salmon farms transmitted to wild salmon, and the spread of diseases and pathogens from farms to wild salmon. These impacts have been linked to significant declines in wild salmon populations. Research conducted by scientists at Dalhousie University has shown that salmon farming is associated with a reduction in survival or abundance of wild Atlantic salmon and sea trout populations by more than 50% per generation on average (Ford and Myers 2008).

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Thank you for your attention to this critical issue.

Sincerely,


Aaron Allen
Coordinator, Margaree Salmon Assoc.

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RECEIVED

By Nova Scotia Aquaculture Review Board at 5:42 pm, Feb 12, 2024

February 12, 2024

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

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, NS.

In 2022, as our region, our country and the rest of the world moved toward recovery from COVID-19, Atlantic Canada's Premiers took a public stand on the importance and value of their region's homegrown, unique aquaculture sector. That statement strongly reinforced the Memorandum of Understanding signed in 2021 by Atlantic Canada's aquaculture ministers to work together on the development and management of the region's aquaculture sector.

Those actions exhibited the strong leadership that's needed to continue to support the salmon farming sector that plays a vital role in both food security and the sustainability of our communities.

Recognized by the Food and Agriculture Organization (FAO) of the United Nations as one of the priorities to address climate change, aquaculture is a responsible, sustainable, and innovative means to provide adequate food supply to meet the world's growing population while helping to reduce the pressure on wild fish stocks. The Earth Policy Institute stated that "as the world's oceans are fished to their limits, any increase in world fish consumption will come from farms." The growing importance of aquaculture to feed the world opens a window of opportunity for seafood producing regions like Nova Scotia.

Our salmon farming sector alone generates just under \$2 billion in economic output, \$800 million in GDP, about \$350 million in salaries for more than 8,000 workers. Atlantic Canadian salmon farmers grow 343 million climate-friendly and healthy meals annually. Of those numbers almost a 1000 are based in Nova Scotia.

Our 2023 annual consumer polling found, once again, that 81 per cent of Atlantic Canadians support aquaculture and agree that local salmon farming is a reliable and sustainable source of protein. The survey also found 83 per cent of Atlantic Canadians agree sustainable aquaculture helps to ensure food security in our region.

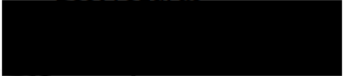
Nova Scotia has an abundant natural ocean environment that provides optimal conditions for growing farmed fish in a sustainable way. We have companies that want to continue to invest in the aquaculture industry in the province. We also have dedicated and hardworking people who want to continue their family's centuries old tradition of working on the water.

Salmon farming can play a key role in Nova Scotia's food security as well as help meet the growing global demand for seafood, and by doing so, create jobs at home, generate investment and renew the tax base in rural communities. Our association represents a diverse range of aquaculture professionals including producers, feed, and pharmaceutical companies as well as organizations, institutions, and companies that play an important role in the management, service, and development of this sector. Those companies represent over 1500 entities benefiting from the sector in Atlantic Canada, many based in Nova Scotia that depend on the growth and sustainability of the salmon farming industry.

In closing, I urge the Board not to be wrongly influenced by emotions and NIMBY-ism that ultimately harms Nova Scotia's opportunity to cultivate its ocean economy and create employment and wealth while producing a healthy sustainable food.

I have included with this letter a summary of facts about Nova Scotia's salmon farming industry. I strongly recommend the ARB review those facts, access robust science, and refer to credible third parties when making its' decision on this application.

Best regards


Susan Farquharson
Executive Director

Enclosure

, Letang, NB  | Office:  Fax: 



atlanticfishfarmers.com



Chad Clothier

Hunts Point, NS.

Canada

RECEIVED

By Nova Scotia Aquaculture Review Board at 5:46 pm, Feb 12, 2024

Clerk of the Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill NS

Email: Aquaculture.Board@novascotia.ca

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 Clerk and Board,

We oppose this project which we believe will harm the local economy - Factor 2

Located in Queens County Nova Scotia, RumClo Developments was born out of a love for the region that we live in. Founded in 2022, with the need for housing at a critical point, our goal is to not only provide much needed housing options but also a community driven and lifestyle orientated way of life. Rural Nova Scotia has become a sought after place to live for those leaving the busy city life behind, outdoor & adventure seekers, and migrants from across the country. Our aim at RumClo is to provide much needed homes for our local residents and to attract new residents to Queens County that will contribute to the growth of our county. We create modern communities that blend seamlessly with the unique South Shore, Nova Scotia environment. Our homes are skillfully designed to ensure quality craftsmanship, a low carbon footprint and of course they look sleek, too!

The Point on the Mersey by RumClo Developments is a real estate, subdivision project underway on property adjacent to the proposed AQ# 1433 ONPFF site. The Point Development will include 124 detached and semi-detached units (permanent and seasonal) many with water frontage and water views.

RumClo Developments strongly opposes the Cooke Aquaculture expansion of salmon farms in Liverpool Bay. RumClo Developments will be investing \$30 Million into their initiative which has a strong focus on green living. RumClo Developments considers ONPFF as both undesirable to look at and harmful to the environment. We believe that the expansion of salmon farms in Liverpool Bay will have a negative impact on our sales as it will directly interfere with scenic views and the ocean lifestyle we are promoting.

We request that the Board deny this Cooke Aquaculture project.

Sincerely,

A black rectangular box redacting the signature of Chad Clothier.

Chad Clothier
President RumClo Developments Ltd.

cc:

Min. of Public Works, Hon. Kim Masland - mla@gmail.com

Premier, Hon. Tim Houston - Premier@novascotia.ca

Min. of DFA, Hon. Kent Smith - Mindfa@novascotia.ca

Hon. Rick Perkins - rick.perkins@parl.gc.ca

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:56 pm, Feb 12, 2024

From: [Heather Fralic](#)
To: [Aquaculture Review Board](#)
Subject: Licence applications for Liverpool Bay
Date: February 12, 2024 1:59:36 PM

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

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>

> I, Heather Fralic along with Wayne Fralic, reside at [REDACTED], Brooklyn, NS would like to express our concern regarding an application made by Kelly Cove Salmon Limited for a boundary amendment and 2 new marine fin fish aquaculture leases and licences # 1205x, (existing but currently over approved limit,), 1432 and 1433 in Liverpool Bay.

>

> The proposed pens with be run on diesel and have lights on them all night. They are very noisy and will contribute to noise and light pollution

>

> They will not only be unsightly and ruin our ocean view but will decrease our property value significantly.

>

> Everyone visiting our property comments on our beautiful view.

>

> Liverpool Bay attracts many professionals and permanent new comers to our community, attributing to its growth.

>

> Beach Meadows Beach and Liverpool Bay have always been popular tourist destinations. The bay is shared by many recreational and commercial boats. The farms will pollute the beach and restrict navigation in the harbour. We love to watch the sail boats and fishers move through our harbour

>

> We also feel the proposed pens will affect the clarity of the water in Fralic's Cove and diminish the area available for Lobster Fishers holding pens and transmit potential diseases such as sea lice.

>

> This is not intended to debate fish farms but why do they need to be located them close to shore in the mouth of our harbour? Could they not be located on the Atlantic side of Coffin's Island?

>

> The farm provides no local jobs or tax revue to our community

>

> We moved to Brooklyn because of the views and access to water. We feel the proposed expansions will greatly diminish our property and quality of life.

>

> Please consider those of us who live on shore when making your decision

>

> Yours truly

>

> Wayne and Heather Fralic

>

>

>

>

> Sent from my iPad

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:10 pm, Feb 12, 2024

NSARB-2023-001-WRT-114

From: [Mary](#)
To: [Aquaculture Review Board](#)
Subject: RE: (AQ#1205x, Coffin Island), AQ#1432 (Brooklyn), AQ#1433 (Mersey Point). LIVERPOOL, Queens County, (Kelly Cove Salmon Ltd.)
Date: February 12, 2024 2:18:37 PM

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Dear Clerk of the Nova Scotia Aquaculture Review Board,

RE: (AQ#1205x, Coffin Island), AQ#1432 (Brooklyn), AQ#1433 (Mersey Point).

LIVERPOOL, Queens County, (Kelly Cove Salmon Ltd.)

Regarding Section 3 Factor 5:

We are very concerned about the impact of the expansion of the open pen fish farms to the recreational activities, people, and animals in Liverpool Bay. We live in Western Head and use the waters for recreation and are concerned about our health and all the people & animals in the area that depend on these waters for survival. There are protected habitats like The Nature Trust's recent acquisition property at Sand Beach that are just around the corner. We swim in the waters year round from Eagle Head to Summerville at many of the points and beaches in between and do not want to see them damaged, polluted, or unsafe. Our beautiful waters, beaches and community are like no other in the world and should be protected.

Kind Regards,

Mary & Demitrious Apessos

[REDACTED]
Liverpool, NS [REDACTED]

From: [Wayne Mundle](#)
To: [Aquaculture Review Board](#); MINFA@novascotia.ca
Subject: Aquaculture Review Board submission
Date: February 12, 2024 2:32:58 PM

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:13 pm, Feb 12, 2024

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WRITTEN SUBMISSION TO THE NOVA SCOTIA AQUACULTURE REVIEW BOARD
 February 12, 2024

From: Wayne Mundle,

[REDACTED], Halifax Regional Municipality, [REDACTED]

I am writing in regard to the applications

Currently before the ARB: finish aquaculture leases AQ12054, Coffin Island (boundary amendment) and AQ 1432 Brooklyn and AQ 1433 NMMercy Point, New leases/licenses.

I wish to address some of the factors that the ARB has determined to be relevant despite my concerns about the restive scope of these terms for submissions.

I am concerned about this issue as both a fresh water and salt water sport fisher, as a citizen who sails, kayaks, canoes, and swims in our coastal waters.

I believe that this expansion of finfish aquaculture will have a devastating economic impact on existing jobs related to the lobster, and other inshore fisheries.

The pollution from fish farm feed and feces waste is detrimental to these industries as well as every other living thing in our waters such as sea grass, shell fish etc.

The economic benefits from jobs created by finfish farms is minimal compared to the thousands of jobs threatened by this industry.

The sustainability of wild salmon is a factor that cannot be ignored. The applicant in this case has a history of ongoing escapes both here in our waters and in other countries. In fact 3 escapes in the last 6 months some of which were not reported for some time. Is this the type of industry that Nova Scotia wants? It is a well known fact that farmed salmon that escape and breed with our wild salmon destroy the genetics of their offspring. They also spread the viruses and sea lice associated with farmed fish.

This is both a threat to the sustainability of wild salmon, and an economic threat to the many jobs in the sport fishing community.

THE OPTIMUM USE OF MARINE RESOURCES is another factor that I would like to address. I am sure that there are many citizens in the Liverpool Bay area who like me, sail, canoe, kayak and fish in both the ocean and the rivers. All of these activities require the purchase of equipment and numerous supplies that contribute to our economy. Instructors, guides, accommodations are all financial considerations that must be weighed against the minimal number of jobs associated with finfish farms. Future expansion of these recreational activities would be thwarted by this massive expansion of finfish farms.


In my opinion Nova Scotias must shift rapidly to land based farms with recirculating water systems (RAS). Many other industry participants are moving in that direction and we must not

be left behind .

Finally, this entire process with it's limitations on participants who can make presentations is appalling. Everyone living in this Province and anyone visiting Nova Scotia is impacted in some way by it's pollution and by the sales of a product that is subjected to antibiotics and pesticide use.

I submit these limited views I writing despite the fact that, like many other individuals and community organizations, I feel that a verbal presentation should not be denied. Community voices must be heard in the face of such dire consequences imposed upon us by open net pen aquaculture.

Sincerely--Wayne Mundle



February 12, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:15 pm, Feb 12, 2024

Dr. Ulrike Meier

Brooklyn/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

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 Ladies and Gentlemen

I am from Germany and found this beautiful place on our planet earth by chance. More than five years ago I visited my daughter spending a semester at Dalhousie University in Halifax for her studies on Neuroscience and Psychology. For a weekend we travelled to Queens County and spent two nights in Beach Meadows. We fell in love with this area, the extraordinary friendly people and the beautiful nature. To make a long story short we bought a house where we spent as much time as possible during the last years. Me and my family love to walk the beach. We love to kayak and to swim. We love the beautiful nature and we ask you kindly not to extend the agriculture industry here.

I see a big negative effect if the fish farm will be allowed to extend. The impairment is massive as it is. We have the noise, the odor... We see that animals are not well treated – as least as they not should be treated. We see a massive pollution of this beautiful nature.

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

Factors to be considered in decisions related to marine aquaculture sites

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

- e) the other users of the public waters surrounding the proposed aquaculture operation;
- f) the public right of navigation;
- g) the sustainability of wild salmon;
- h) the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation;

So please consider my aspects. Do not extend the Agricultural Activities in this area as it's damaging the nature and the beautiful environment we have here in a sustainable way we can't correct.

Thank you for listening.

Regards

Dr. Ulrike Meier

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:19 pm, Feb 12, 2024

From: [Service, Andrea \(IAAC/AEIC\)](#)
To: [Aquaculture Review Board](#)
Subject: Public Submission in Relation to KELLY COVE SALMON LTD. APPLICATION TO EXPAND/ADD PENS IN LIVERPOOL BAY
Date: February 12, 2024 2:58:18 PM

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

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UNCLASSIFIED - NON CLASSIFIÉ

This email is in reference to Kelly Cove Salmon's application to expand/add pens in Liverpool Bay: **AQ#1205x, (Coffin Island), AQ#1432 (Brooklyn), AQ#1433 (Mersey Point), LIVERPOOL, Queens County**, (Kelly Cove Salmon Ltd.) and is a **public submission against this proposal**.

As a resident of Southwest Port Mouton, I would like to submit my objection to this proposal on the grounds of the **highly adverse environmental, health, social and economic effects** that Cooke Aquaculture's open-pen fish farming would entail for our local and regional community. This proposal will bring no positive benefits for the well-being of current or future generations of Atlantic communities:

- **Open-pen salmon is a health risk to the community.** Treated with dyes, pesticides and antibiotics and raised in pens treated with heavy metals, open-pen farmed salmon has been documented to cause serious health risks to humans, both directly (through consumption of the salmon) and indirectly, through contact in what should remain as our pristine waters.
- **Open-pen salmon farming provides limited economic benefits to local communities, costs taxpayers millions of dollars in subsidies and "crop failure" payments, while threatening or destroying other, more sustainable existing industries such as the lobster fishery and tourism.**
- **Open-pen fish farms pollute our coastal waters and beaches with untreated waste.** For every 1000 metric tons of farmed salmon produced, approximately 200 megatons of feces and waste builds on the ocean floor, smothering marine life, creating dead zones and fouling the beaches and shores, destroying our valuable tourism industry and posing risks to marine wildlife.
- **Open-pen fish farms have adverse effects on marine mammal, fish and bird life.** Chemicals used in open-pen salmon farms – antibiotics, pesticides and antifouling agents such as copper – create toxic conditions in the water column and on the sea bottom, posing serious health risks for marine life. Scientific evidence has shown that lobster populations have been reduced in bays where salmon farms are present in Nova Scotia – potentially risking the livelihood of coastal peoples. Other studies show that numbers of sea birds decline significantly in waters around open pen feedlots. Government regulations to monitor the environmental impact of open-pen fish farms have not been effective.
-

Open-pen salmon farms deplete wild fish populations and destroy viable direct food sources, particularly for local coastal community dwellers. It takes about three kilograms of wild fish to produce one kilogram of open pen farmed salmon. We are thus removing local sources of protein in order to create a luxury product – with no regard for the health, social and economic conditions of local communities.

- **Open-pen salmon farms easily become intensive breeding grounds for ISA (Infectious Salmon Anemia) and other serious diseases.**
- **Open pen salmon farms are economically unsustainable.** Salmon market prices are below production costs while contaminants from open-pen fish farms threaten lobster health and growth. The lobster fishery is a billion dollar a year business in Nova Scotia that is put at risk from open-pen farms.
- **Open-pen salmon threaten the health and genetic vigour of wild salmon.** In Nova Scotia, some salmon farms are on the migration routes of our recovering wild Atlantic salmon.
- **Land based closed-containment salmon farms are a much better option, mitigating the cumulative environmental effects of open-pen fish farming, protecting the health of local communities, and preserving local industries, such as tourism.**

Please put a stop to this proposal.

Andrea Service

ANDREA SERVICE

[REDACTED]

SOUTHWEST PORT MOUTON

NOVA SCOTIA [REDACTED]

[REDACTED]

Andrea K. Service, PhD

Senior Policy Analyst, Strategic Policy and Programs

Impact Assessment Agency of Canada / Government of Canada

Analyste principale en politiques, Politiques et Programmes stratégiques

Agence d'évaluation d'impact du Canada / Gouvernement du Canada

[REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:29 pm, Feb 12, 2024

NSARB-2023-001-WRT-118

Glen Parlee

██████████ Milton NS
██████████

Clerk of the Nova Scotia
Aquaculture Review Board
e: Aquaculture.Board@novascotia.ca

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

Liverpool Adventure Outfitters is opposed to the expansion of Kelly Cove Salmon Ltd. in the Liverpool Bay, NS. Our concerns relate to the following factors as listed in Section 3 of the Aquaculture License and Lease Regulations:

Factor 1) The optimum use of marine resources and Factor 2) Contribution of the proposed operations to community and provincial economic development.

Open net pen fish farming is not the best use of marine resources in Liverpool Bay and will not only not provide economic benefits to the community but will negatively impact the local businesses already in operation.

Liverpool Adventure Outfitters (LAO) has operated in Liverpool, NS since XXXX. We offer Paddle and Full Day Picnic tours in Liverpool Bay and Coffin Island but avoid going anywhere near the existing fish farm site due to its many ropes, buoys, noisy feed barge and oily slick water. Our guests are primarily tourists visiting, staying and spending money in the Liverpool area because of its proximity to the ocean and pristine beaches, not because of its fish farms..

Should the proposed expansion of fish farms proceed at the Coffin Island site in addition sites at Fralic's Cove and Mersey Point locations, we believe that impacts to water quality and marine life is likely to affect our ability to attract guests to paddle in Liverpool Bay.

Please do not approve this proposed application.

Sincerely,

Glenn Parlee
Owner/ Operator

cc: Kim Masland, MLA Queens-Shelburne | kim.maslandmla@gmail.com

Darlene Norman, Mayor, Regional of Queens | dnorman@regionofqueens.com

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:32 pm, Feb 12, 2024

From: [Stoneshield Altman](#)
To: [Aquaculture Review Board](#)
Cc: [Premier](#); [Minister DFA](#); kim.maslandmla@gmail.com; [Minister, Env](#); [Health and Wellness Minister](#); [Economic Development Minister](#); garyburrillmla@gmail.com; leader@greemparty.ns.ca; rick.perkings@parl.gc.ca; justin.trudeau@parl.gc.ca; DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca; Ministerofred-ministreduder@ised-isde.gc.ca
Subject: Opposing Fish Farms Liverpool Bay applications AQ#1205x, AQ#1432, AQ#1433
Date: February 12, 2024 3:03:05 PM

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FROM: Stoneshield ALTMAN and L. Maya SMITH

[REDACTED]
 Western Head
 Liverpool
 Queens County
 [REDACTED]

February 12, 2024

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

Via e-mail: Aquaculture.Board@novascotia.ca

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 Sir/Madame,

I am writing to you on behalf of my wife and myself, and on behalf of our many friends and neighbours who live in this remarkable area, to encourage (nay – to beseech) you to deny the Kelly Cove Salmon Ltd./Cooke application (referenced above) which aims to drastically expand their current operation at Beach Meadows (off Coffin Island) and to site two additional new salmon feed-lots in Liverpool Bay.

We understand that you are focusing your decision on 8 Factors, and quite frankly these have been addressed in extensive detail by the many many letters and affidavits that you have already received, and hopefully read. Nevertheless, I would draw your attention to several of these factors,

Factor 4) – Oceanographic and biophysical characteristics of public waters.

Our home at 1237 Shore Road is situated on a 45' cliff overlooking the ocean, just past (seaward) Strawberry Point, near the mouth of Liverpool Bay. We live within sight (and kayak distance) of the two new proposed lease sites as well as the current Beach Meadows/Coffin Island feed-lot, and we frequently walk, picnic, and swim (when it's warm) off Beach Meadows which is adjacent to the Coffin Island feed-lot.

In the two years that we have lived here, we have experienced two significant hurricanes – both of which are described as unprecedented because storms of such magnitude hitting Nova Scotia tended to be rare. These powerful storms are no longer unprecedented, instead, due to the documented effects of climate change, they are now the norm and over time are predicted to become more powerful.

Immediately after hurricane Lee, I was able to measure the height that the storm surge and waves reached above the beach at the base of our cliff. The waves broke against the cliff at a height of 30-32 feet above the beach; the spray, of course, reached much higher. Note that the funneling effect of the bay itself would cause similar or even greater wave heights at the sites of the two new proposed salmon feed-lots.

Using common sense alone, you must see that damage by storms to the proposed open-pen feed-lots in Liverpool Bay would be increasingly likely, inevitable, and increasingly severe. Damage to Kelley Cove/Cooke's current feed-lot operation off Beach Meadows after hurricane Lee - though denied by the company - was evidenced by the feeding barge dislocation, moorings damaged and displaced, and numerous dead salmon on the shore. This despite the operation being sheltered by Coffin Island. The two new proposed feed-lots will have no such shelter at all and would be exposed to direct action by wind and waves.

Furthermore, I would remind you that:

- the community's economy will be negatively impacted (Factor 2) by decreased tourism, decreased property values, decreased new home building and purchasing, decreased overall employment. These salmon feed-lots are unsightly, they smell, the water surrounding them is rendered unsuitable for swimming because of the chemicals that drift in from the open-pens, as well as the copious amounts of fish feces that drift in and litter the beaches and rocks.
- lobster fisheries and fishing will be negatively impacted (Factors 2 & 3) by the displacement and reduction of trapping areas, sea-bed pollution and oxygen dead zones directly below and in the area surrounding these huge feed-lots, which will reduce the health and population of lobsters in the area.
- public navigation and use of Liverpool Bay and the surrounding waters will be negatively impacted (Factors 5 & 6) by the intrusion of these feed-lots, which will impede that navigable waters of the Bay, especially as regards to sail boats and other personal craft (see Brooklyn Marina); kayaking, canoeing, and rowing (which require unimpeded shorelines); and commercial fishing craft.

Again – point by point, all of these factors have been addressed in detail and well documented by the many letters from our community members and from local organizations and government bodies that you have already received. If you study these letters, affidavits and documents, you will see that it is patently obvious that Liverpool Bay is not suited for this type of operation, nor will it bring benefit the people of Liverpool, Queens County, or the people and Province of Nova Scotia.

However, there are two further points I wish to make. The first is that Kelly Cove/Cooke has violated past agreements regarding lease size (e.g. Coffin Island operation) and failures to monitor or alleviate various violations. These are all documented and have been brought to your attention in other submissions and affidavits. The boundary violations off Coffin Island were simply given a pass, without explanation or penalty, while other violations engendered only minimal fines with no enforcement follow-up. Any reasonable person will conclude that Kelly Cove/Cooke cannot be trusted to uphold their agreements, and the Province cannot be trusted to enforce those agreements. This is not good and does not bode well for the future; I urge you to be mindful of this.

The second point is that you are empowered by us, by the public. Your duty is to us, to the citizens of Nova Scotia, and further the citizens of Canada – your responsibility is to act for

the good of the Province, and for the good of the Nation.

As a recent immigrant to Canada from the south, I would urge you to look at what decades of cynical disregard for the public good and welfare and the cynical protection of special interests and big business at the expense of hard-working citizens, has done to the political and civic culture of the United States. The middle class has been hollowed out, and there is only anger and frustration at a government that is dysfunctional and unresponsive, and basically no one thinks that the government can or will do anything to solve real problems. Trust in government, in democracy itself, has deteriorated to a dangerous degree in the U.S. and believe me, this can happen here in Canada in the blink of an eye.

I urge you to think on this, on what your responsibilities are and to whom you are responsible. I urge you to reject the application for the expansion of the current fish farm, and to reject the application for the two new leases. I urge you to stand up for the benefit of the people of Liverpool, of Queens County, of beautiful Nova Scotia, and of precious Canada itself.

Thank you for your consideration.

Sincerely,

Stone ALTMAN
Maya SMITH

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:37 pm, Feb 12, 2024

February 11, 2024

Jane Fairburn and Mark Rodger

[REDACTED]
Port Medway
Nova Scotia
[REDACTED] and

The Idle Hour

[REDACTED]
Port Medway
Nova Scotia
[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill
Nova Scotia
B6L 2R2
E-mail: Aquaculture.Board@novascotia.ca

ATTENTION: NOVA SCOTIA AQUACULTURE REVIEW BOARD

Re: 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.

Some fifteen years ago, my husband Mark Rodger and I were introduced to the enchanting village and pristine waters of Port Medway in Queens County, Nova Scotia through friends with generational connections to the area. Not surprisingly, we fell in love with the natural beauty of the both the village and the County that instilled in us a profound sense of place and belonging. A few years later, we counted ourselves among the lucky ones to be welcomed into the quintessential Nova Scotian community of Port Medway as part-time residents.

In 2021, Mark and I invested a substantial amount of time and money into a second property in Port Medway, taking on the restoration of *The Idle Hour*, a former ship captain's home on the waters' edge. *The Idle Hour* presently operates as a small business, receiving guests from Nova Scotia, across Canada and abroad for long and short-term rentals and events.

This summer we will be welcoming guests from Scotland, Ireland and other destinations to experience the natural beauty of Queens County and its unsurpassed beaches, within the context of the greater Southwest Nova Biosphere Reserve. The importance of the natural world and the unspoiled shore to the success of our business (and so many other

businesses like it) cannot be understated – it is a key feature for us in securing bookings to *The Idle Hour*.

We are strongly opposed to the above-noted application of Kelly Cove Salmon Ltd. that will have the effect of reducing the nearshore waters of Beach Meadows Beach Park and the mouth of the Mersey River at Liverpool to industrial feed lots for the benefit of the applicant alone.

We stress that the Mersey River, Beach Meadows beach and the nearshore waters are sacred, *communally held* assets that rightly deserve to be used and enjoyed by all Nova Scotians, and indeed all Canadians. No one business, be it a locally owned small business, or a massive, privately held corporation operating in the name of Kelly Cove Salmon Ltd., deserves to monopolize this resource to the detriment of the enjoyment and use of everyone else. We therefore ask that the application be denied.

Though we believe there are grounds for denying the application on all factors outlined in section 3 of the Aquaculture License and Lease Regulations, made under Section 64 of the *Fisheries and Coastal Resources Act*, 1996, we are for the purpose of this letter focusing our concerns on the economic considerations outlined in s. 3(b). Simply put, there is no viable business case on which to approve the project. The adverse and potentially devastating impacts to the natural environment, animal and human health that flow through to the local and provincial economies far exceeds any paltry gain in local employment.

The applicant proposes a radical and highly ambitious increase to the number of open-pen cages already approved and in existence in the nearshore waters of Beach Meadows, along with a series of other cages at the mouth of the Mersey River. Though hired experts will undoubtedly massage the potential outcomes, the hard reality is that the applicants propose a 370 percent increase in untreated fish feces that will be directly deposited into greater Liverpool Bay. In any scenario, this proposal is highly unreasonable; in the case of Liverpool Bay with its shallow waters that will not flush effectively and its particular currents, it is a disaster in the making.

While polluted and noxious shorelines, stress on endangered species, reduced lobster catches, a further decline to the wild salmon population and harm to the local tourist and development economies are certain outcomes, human and animal health must also be considered. All of these factors will have an adverse economic impact on Queens County and indeed Nova Scotia.

The fact remains that the industrial fish feed lots proposed will require constant maintenance through the use of pesticides and antibiotics released into the nearshore waters and air. These particulates will inevitably be absorbed into the bodies of the wild fish, and the creatures and humans that access the shore.

What market value may we put on human and animal health and the beauty of Nova Scotia's South Shore beaches, with the opportunity they present to connect to the natural world? Though some may find the question appalling to contemplate, the application

demands that we do just that in a consideration of s. 3(b). We say that the value is *far in excess* of the estimated 20 jobs this proposal may create. Further, the technological gains made through the adoption of a land- based fishery have been demonstrated to be far less damaging to the environment, animal and human health, and this fact alone should render the application obsolete.

Beyond the economic consequences of an environmental disaster in the making, please consider the following: Nova Scotia's pristine South Shore beaches are part of our shared cultural heritage as Nova Scotians and Canadians. You have the opportunity through the consideration of this application to affirm that this precious resource remains part of our shared, collective trust. We therefore ask that the application be denied.

M. Jane Fairburn

J. Mark Rodger

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:46 pm, Feb 12, 2024



February 12, 2024

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

Halifax, NS

Tel.

Fax.

www.tians.org

Attention: Nova Scotia Aquaculture Review Board

On behalf of the Tourism Industry Association of Nova Scotia (TIANS), we are writing in regards to the application made by Cooke Aquaculture/Kelly Cove Salmon Ltd. for a boundary amendment and two new marine finfish aquaculture licenses and leases for the cultivation of Atlantic salmon in Liverpool Bay, Queens County.

TIANS unequivocally opposes the expansions noted in the above-referenced application.

In 2023, Tourism generated \$3.2 Billion and over \$450 million in tax revenues for the province. The multiplier effect of the tourism sector is the highest in the economy, for every \$1 spent, another \$3.2 is generated in local communities. Adventure Tourism and Recreation is one of the fastest growing sectors; with coastal, marine-based experiences being reported by Tourism Nova Scotia as a key travel motivator for over 90% of visitors to the province. Liverpool Bay is a significant marine asset with tremendous tourism value. Further, it holds strong growth potential, particularly in pleasure craft and as a small cruise port.

During the COVID-19 pandemic Nova Scotia developed a reputation as a pristine and safe destination. Travellers are seeking out places that value and demonstrate environmental stewardship. During recent months, the provincial government has made a number of announcements related to advancing protection for Nova Scotia's natural resources; these decisions reflect a broader understanding of the interconnectivity between a healthy environment and a lucrative tourism economy. In fact, in 2022, Premier Houston announced the development of a new Tourism Strategy which is currently underway. Consultations and research to date highlight environmental stewardship as a key priority, with marine-based tourism, ranking particularly high. Approving this application would be in conflict with the growth strategy for Tourism, and pit one sector against a number of Nova Scotia's primary industries.

Regulatory policy and decisions which do not protect the health of our marine ecosystems, will be detrimental to current and future tourism growth. TIANS strongly urges you to deny this application.

We have included our Position Statement related to Open Pen Fish Farms, for consideration.

Sincerely,

Wes Surrett
TIANS Chair

Darlene Grant Fiander
TIANS President

cc TIANS Board of Directors

Enclosure (1)

Position Statement

Statement on Proposed Aquaculture Development Sites Liverpool Bay Queens County

TIANS has been asked to restate our position regarding the Open Pen Fish Farms in Nova Scotia in light of the application for 2 new Open Pen Fish Farms and one expanded site in Liverpool Bay, NS.

This application for expansion is gravely concerning in this well-established coastal tourism area. There is significant opposition from numerous community groups concerned with the environmental and tourism impact around this type of activity.

In February 2013, after an extensive jurisdictional scan of Open Pen Fish Farms TIANS released its first Public Position which focused on the potential impacts of this type of aquaculture for the province. In early January 2020, additional research on destinations that have moved away from Open Pen to land based only, was undertaken and our position reaffirmed.

TIANS continues to maintain the principles outlined in our position on Aquaculture Development. Any decisions made regarding aquaculture operations must include consideration for the possible negative impact on the tourism industry, which is Nova Scotia's largest service export. In 2023, tourism generated \$3.2 billion in revenue, accounted for almost \$500 million in tax revenues, employing over 40,000 Nova Scotians. As the sector continues to rebuild from COVID-19, protecting our natural assets, including the pristine coastal environment is critical.

The viability of hundreds of tourism businesses across Nova Scotia are dependent on the sea and coastal experiences. Recreational and eco-tourism activities are two of the fastest growing sectors of tourism in North America. People are attracted to Nova Scotia in large part by our beautiful and pristine coastlines and our brand for the province "Canada's Ocean Playground" says it all. Regulatory policy and decisions which do not protect the health of our marine ecosystems will be detrimental to current and future tourism growth.

As well as recognizing the impact on tourism as a key factor when considering new site location applications, TIANS upholds the following key, principle position:

- *closed containment land-based finfish and small-scale shellfish operations provide the most responsible practices for development in Nova Scotia. A focus on these types of operations would be more sustainable for the province and minimize the impact upon other industries.*

In summary, the health and sustainability of Nova Scotia's lucrative tourism industry is intricately linked to our natural and coastal assets. Tourism enhances the cultural, environmental and social health of every Nova Scotia community. A decision to support expansion of Open Pen Fish Farms would negatively impact the province's tourism industry and other primary resource sectors.

TIANS represents thousand of businesses and workers across Nova Scotia.

To: The Clerk of the Nova Scotia Aquaculture Review Board

I am writing to express significant concern about 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 (AQ#1205x, AQ#1432, AQ#1433) in Liverpool Bay, Queens County. My comments in this letter relate to Factor 7: *The sustainability of wild salmon* as listed in Section 3 of the Aquaculture License and Lease regulations.

I as a Nova Scotian do not want this expansion to proceed. Through attending an international conference in Vancouver discussing salmon in both the Atlantic and Pacific, I learned there is international consensus among the top geneticists that the number one threat to wild salmon is genetic integration of escaped aquaculture fish. In my opinion, we cannot have both sea cage salmon aquaculture and wild salmon. Further, the rights of Indigenous Peoples, the Mi'kmaq, are intrinsically attached to wild fish. Without wild fish, in particular salmon, the ability to exercise the right is lost leading to the loss of the culture and so then the people. We cannot have that and so I deeply appose sea cage salmon farming and even more so the expansion of sea cage salmon farming in this region. We must put our focus towards land-based fish farming where impacts to our wild stocks and ecosystems are enormously reduced.

While Nova Scotia may have jurisdiction over aquaculture, there is one *Fisheries Act* in Canada that has jurisdiction over the protection of wild fish. Further, while Nova Scotia embarrassingly does not recognize UNDRIP, the federal government does, and they must apply the *Fisheries Act* without discrimination and in a manner that upholds Indigenous Rights. While the West Coast is moving towards land-based facilities, the East seems fixated on eliminating wild salmon to open up expansion for industry. I will not stand for this attack on our ecosystems and our Indigenous friends.

I understand this company in particular has continuously made one bad choice after another; from poisoning the ocean with cypermethrin, a pesticide that is banned in Canada and kills several marine species, putting other's livelihoods in jeopardy, to using European genes in their breeding even though it is illegal to import and release non-native fish species. Why should we allow them to continue?

This expansion is of particular concern to me, given that the *DFO Maritimes Region Science Review of the Proposed Marine Finfish Aquaculture Boundary Amendment and New Sites, Liverpool Bay, Queens County, Nova Scotia* report cites that aquaculture escapees have been found in rivers at distances of up to 200–300 km from the nearest aquaculture site (Morris et al. 2008). The proposed leases fall within the range of the Southern Uplands (SU) wild Atlantic Salmon population. This population of Atlantic Salmon is designated as critically low, classified as Endangered by COSEWIC since 2010. The SU salmon population is deemed biologically unique, and its extinction would result in an irreparable loss of Atlantic Salmon biodiversity (Gibson et al. 2011). This in turn would be an irreparable loss to Indigenous culture and further disregard of the Peace and Friendship Treaties that we as Nova Scotians all live under.

Studies indicate that open net-pen salmon aquaculture has profound effects on wild Atlantic salmon through various pathways, including the escape and interbreeding of domestic salmon with wild populations, proliferation of sea lice on salmon farms transmitted to wild salmon, and the spread of diseases and pathogens from farms to wild salmon. These impacts have been linked to significant declines in wild salmon populations. Research conducted by scientists at Dalhousie University has shown that salmon farming is associated with a reduction in survival or abundance of wild Atlantic salmon and sea trout populations by more than 50% per generation on average (Ford and Myers 2008).

Escapes from aquaculture sites pose a significant and ongoing threat to the genetic fitness of wild Atlantic salmon populations (Forseth et al. 2017, Bradbury et al. 2020b, Glover et al. 2020), with documented occurrences in Atlantic Canada and beyond (Glover et al. 2017, Keyser et al. 2018, Diserud et al. 2019). Recent genetic studies have confirmed widespread hybridization between wild salmon and escapees, particularly notable in regions like Norway (Karlsson et al. 2016) and Newfoundland (Sylvester et al. 2019, Wringe et al. 2018). These interactions can span large areas and escapees can constitute a significant portion of a population's annual production (Glover et al. 2013, Glover et al. 2017, Heino et al. 2015, Sylvester et al. 2018, Wringe et al. 2018) and can lead to decreased survival of hybrids, with population declines and loss of genetic diversity likely (Fleming et al. 2000, McGinnity et al. 2003, Sylvester et al. 2019) as indicated by both experimental studies and modeling when escapees exceed 10% of the wild population annually (Castellani et al. 2015, 2018, Sylvester et al. 2019, Bradbury et al. 2020). The industry is only required to report and provide details when escapes of more than 50 fish occur. To put the dangers of unreported escapes into perspective, if there are even two unrelated incidents of 40 fish each, a wild population of under 1000 wild fish will suffer.

Domestic fish in aquaculture operations can contract diseases and sea lice infestations from nearby farmed fish (Kristoffersen et al. 2013, Frazer et al. 2012), posing significant health risks to both farmed and wild populations, especially when host density reaches certain threshold levels (Krkošek 2010). Although pest control products have not been used at the existing site in Liverpool Bay since 2015, the abundance of sea lice remains unknown. Introducing farmed fish into an area is likely to exacerbate the prevalence of pathogens and pests due to the higher number of host fish, which is particularly harmful when smolts migrate to the ocean in the Spring, passing through an elevated abundance of sea lice.

Everywhere open net-pen salmon aquaculture exists in Atlantic Canada, wild Atlantic salmon are considered threatened or endangered by the Committee on the Status of Endangered Wildlife in Canada, including the southern upland population found on the Southwest coast of Nova Scotia. This project poses a significant threat to the already endangered Southern Uplands wild Atlantic Salmon population. Time and time again, we see that Nova Scotians are opposed to these projects; this is no different. I urge you to prevent this expansion in Liverpool Bay from proceeding.

Thank you for your attention to this critical issue.

Sincerely,

Lachlan Riehl

[REDACTED],
Halifax NS
[REDACTED]

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RECEIVED

By Nova Scotia Aquaculture Review Board at 9:51 pm, Feb 12, 2024

February 12, 2024

John MacDonald

[REDACTED]

Bayswater, NS

[REDACTED]

Email:

[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board

60 Research Drive

Bible Hill, NS B6L 2R2

E-mail: 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 today as a resident of Bayswater, Nova Scotia opposing the proposed expansion of the Kelly Cove Salmon operations in Liverpool Bay. My opposition is based on my real life experience of living with the Saddle Island site AQ#1006 operating in our community for the last 25+ years, and the negative effects I have witnessed at Bayswater Provincial Beach Park. The Saddle Island site is located appropriately one Kilometer away from Bayswater Beach, a similar distance between the existing Coffin Island site AQ#1205 and Beach Meadows Beach in Liverpool Bay.

In their 2022 assessment of Liverpool Bay the DFO clearly showed the Predicted Exposure Zone (PEZ) of the existing Coffin Island site would encompass Beach Meadows Beach, meaning the water and bottom sediment is likely already contaminated with chemicals and fish feces from just the Coffin Island site alone. Increasing the number of fish in these nearby waters from the current 440,000 to the proposed 1,980,000 could have a devastating impact on the ecosystem of Liverpool Bay, including Beach Meadows Beach.

We have seen first hand how these types of reckless industrial experiments can go horribly wrong here in Bayswater after the Province of Nova Scotia allowed KCS to illegally relocate the Saddle Island site AQ#1006 in 2018, resulting in the unprecedented contamination of our once beautiful White Sand

beach. The response by the Province to this ongoing disaster at Bayswater Beach Provincial Park has been shameful, and demonstrates how allowing ONP Aquaculture sites to operate too close to public beaches in our shallow, low current bays can have devastating ecological consequences.

In the case of Bayswater, the Province sadly chose to protect an ONP Salmon Farm rather than a Provincial Beach Park as it continued to promote Nova Scotia as “Canada's Ocean Playground”. This demonstrates the consequences of allowing the promoter to also regulate this highly profitable and highly polluting industry. They appear unwilling to learn from their mistakes (or even acknowledge them) and cannot be trusted to do the right thing when things go wrong. They also appear willing to put our bays and beaches, which make us so unique as a Canadian Province, at risk by promoting an unsustainable industry, and seem to be losing their moral compass by neglecting to protect and preserve these areas. Recent comments by Premier Houston personally opposing this application may be an indication that they are finally beginning to recognizing that the ONP Aquaculture industry has no place in our shallow Nova Scotia bays.

Given the massive scale of this expansion application, the stakes are just too high for the committees surrounding Liverpool Bay including Beach Meadows, and I therefore unequivocally oppose this expansion application.

Regards,

John MacDonald

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:57 pm, Feb 12, 2024

February 12, 2024

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

E-mail: 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 Sirs/Mesdames:

Though not a resident of Liverpool, my family has been here on the South Shore since 1752, 272 years and counting. We have been and are in it for the long haul. Consequently, I have dedicated my life to protecting this environment and our way of life. **I strongly oppose the hypocrisy of enforcing strict laws preventing human sewage from entering our public waters while licensing open-net pen operators to let the raw waste from their fish farms do the same.**

My argument to the Aquaculture Review Board addresses all 8 factors.

- A.) Optimum use of marine resources.** Obviously our marine resources are negatively affected by ONP's. The mountain of affidavits, interventions, and letters presented to your hearing details the myriad effects. Impacts on the lobster fishery, for example, or the impact on the wild Atlantic salmon, are not moot. They are proven. When options like RAS technology are so ready and available, and now competitive in the marketplace, why would we permit ONP's?
- B.) Contribution to community and Provincial economic development.** Mutant ONP fish, chemicals and inhumane treatment of captive animals, dramatic degradation of our natural environment, industrialization of our coasts, disappearing profits leaving the Province - the ONP industry leaves Nova Scotia but one viral video away from a devastating hit to the very backbone of our culture and economy; that is, our cold, clear, clean waters and the vital seafood products from which they are harvested. This concept, a key but highly vulnerable asset, constitutes our brand, the envy of the world.

- C.) Fishery activities in the surrounding public waters.** Why do you think 23 Liverpool Bay lobster harvesters have joined forces at great expense to hire expert legal advice and commission studies and affidavits to substantiate their argument that the Kelly Cove applications are a threat to their livelihood? And how about the Acadian First Nation, KMK and the moderate livelihood fishers' intervention? And what do you think will be the effect on the recreational fishery of continued escapes, pathogens and pollution from the ONP's drifting into the vulnerable fresh and salt water habitats of the dangerously diminished wild Atlantic salmon populations?
- D.) Oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation.** Clearly again as detailed in the materials submitted to your Board, shallow Liverpool Bay surrounded by highly vulnerable ecosystems and natural features is not suitable for fish farming. But as has always characterized ONP aquaculture in this province since its inception, the argument over whether to license or not always boils down to "my science vs. your science." The stack of "peer-reviewed" science proving either side is higher than the others'. The decisions in the end are therefore rarely based on good hard objective science but are rather based on a combination of politics and financial reward. I do not envy the Board's task, but pray that clarity of vision and respect for posterity will rule your deliberations.
- E.) Other users of the public waters.** The local marina and the lobster fishers have both clearly described the Navigable Waters issues. So have the users of surrounding parks and beaches and the people whose homes look out up upon the new and existing sites. All have described the impacts they do now and would face were you to rule in favour of these applications. However, you may not have heard so clearly from the wildlife which will be affected, the animals who will be displaced, whose habitats will be polluted, who will feed on the tonnes and tonnes of ONP waste. Zero effluent, sustainable land-based options do exist producing a product with the exact same output touted (but in truth never delivered) by the ONP industry – "good, Omega 3 rich protein to feed the world."
- F.) Navigation.** As above, the interventions from the bay's lobster harvesters and its recreational boat users have shown clearly and convincingly that if realized the applicant's vision is in direct contravention of both their, and the Municipality of Queen's vision for the future of Liverpool Bay. They are on a collision course with the Kelly Cove pens.
- G.) Wild salmon sustainability.** The Atlantic Salmon Federation, the Nova Scotia Salmon Association and salmon associations from surrounding watersheds have all supplied the hearing directly or indirectly with their extensive commitment and expertise. Throughout both the continent's east and west coasts individuals and communities with a stake in the survival and increase of wild salmon have expressed their opinions. Far be it from me to, in a paragraph or two, try to repeat or summarize their expert points of view. Call it circumstantial evidence if you want, but the bottom line is, everywhere ONP's have increased, wild salmon populations have decreased.

H.) The number and productivity of other aquaculture sites. The aquaculture industry is on the move. Shellfish and plant product harvests are on the rise. The world sees the responsible growth of this sector as a low carbon key to survival. They rely on healthy waters and a clean environment. Currently there is little competition in Liverpool Bay from these other, more sustainable types of aquacultures, but should your Board deny this current retrogressive application, they could find room to flourish, ushering in a new, "greener" "*bluer*" future.

As the Board is no doubt aware, this hearing could mark a real turning point in the future of responsible aquaculture and even broader, the future of Nova Scotians' relationship with our precious coastal waters. We cannot restrict pollution of this resource from one source while allowing it from another. We need conformity in our laws, east and west, and in their application. Our coastal waters are the threshold to the oceans beyond. They are a resource the management of which we *can* influence both through provincial and federal law.

I urge you to deny this application.

Sincerely,

[REDACTED]

Geoff Le Boutillier

[REDACTED]

Glen Haven, Nova Scotia

[REDACTED]

[REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:00 pm, Feb 12, 2024

From: [Bridget Sexton](#)
To: [Aquaculture Review Board](#)
Subject: Liverpool Bay Aquaculture "Fish Farms"
Date: February 12, 2024 3:31:43 PM

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February 12, 2024

[REDACTED]
Port Medway NS
[REDACTED]

Clerk of the Board: Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NS B6L 2R2
E-mail: 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.

As a resident in Queens County I am completely against the expansion of existing fish farms in the Beach Meadows area and the addition of new pens in Liverpool Bay!

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

Queens County relies heavily on tourism. The state of Beach Meadows Beach is deteriorating rather quickly. The effluence from the existing pens is being washed up on shore, especially with the increasing frequency of storms. The smell on the beach in the heat of summer is disgusting. I believe the site is tested for fish feces etc but this is only under the actual pens. Our ocean is in constant motion and the bottom is constantly shifting and washing onto the shore. My fear is that antibiotics and pesticides are washing up in this detritus!

Liverpool Bay is NOT a location for new pens. This poses risks to water vehicles and navigation.

The amount of krill being fished to feed this 'salmon' in order to feed humans is outrageous. This is a whole new issue impacting our ocean creatures. Much of this farmed salmon goes into dog food, not human food.

I am not against Aquaculture. It has its place. We are talking about fish farms here. They belong on

land with a processing facility attached. This is where the permanent jobs would be created. There is minimal economic gain from these 'farms' in our bays. They stink and are unsightly!! The fish is very poor quality also.

We have recently purchased our home in Port Medway and have invested over \$ [REDACTED] into renovating it. We left the city life of Halifax to improve our quality of life and to preserve a house and forest on the south shore.

We all need to work hard and wisely to preserve the beautiful shorelines and intercoastal waterways of this beautiful province.

I am completely against the expansion and addition of fish farms in Beach Meadows and Liverpool Bay.

Factors to be considered in decisions related to marine aquaculture sites

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;
- 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;
- d. the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation;
- e. the other users of the public waters surrounding the proposed aquaculture operation;
- f. the public right of navigation;
- g. the sustainability of wild salmon;
- h. the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation;

I am completely against the expansion and addition of fish farms in Beach Meadows and Liverpool Bay.

Bridget M Sexton

[REDACTED]

Port Medway

NS

[REDACTED]

Great Island, Queens County, Nova Scotia
12 February, 2024

RECEIVED

By Nova Scotia Aquaculture Review Board at 10:04 pm, Feb 12, 2024

Clerk of the Board: N.S. Aquaculture Review Board 60 Research Drive, Bible Hill, NS B6L 2R2

E-mail: 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.

To Whom it may concern:

I am a grandparent, writing for our family including a two-year-old granddaughter, whose connection to the waters of Queens County only go back 50 years. But year-round living on Great Island for many years has given us a very personal and up-close look at the changes the humans of this county and far beyond have contributed, none for the better.

We have studied this complex issue through the works of the late Dr. Ransom M. Meyers and the research of Alexandra Morton and others who have convinced other licensees from coast to coast to abandon their productions which have made the sea floor a fetid, toxic mess.

I attended the public presentation of Independent Review of Aquaculture Regulation by The Doelle-Lahey Panel and have studied that review. More evidence has been collected world-wide since that Panel and no open-cage activity is considered appropriate.

It is true that I personally will not be around much longer to experience what you are considering but our granddaughter will and for her, I write to say this form of production is not acceptable in sea waters.

This is not about economics for Nova Scotia, jobs etc. This is a greedy, unconscionable production method that impacts everyone. Why do people in positions to judge these matters so often yield to corporations over the will of the citizens? Is this what democracy looks like?

Please reject these aquaculture licenses and leases for the sake of the young who would otherwise inherit a near-sighted detrimental decision to Queens County's waters.

Thank you for the opportunity to share my thoughts.

Aloha,
s. j. hauer

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:41 am, Feb 13, 2024

12 February 2024

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

E-mail: Aquaculture.Board@novascotia.ca

Reference: 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.

Please accept this submission as written input from Helga Guderley, PhD and representative of the St. Margaret's Bay Stewardship Association to the Aquaculture Review Board (ARB) Hearing on the three applications from Kelly Cove Salmon (KCS) for new and expanded operations in Liverpool Bay and environs.

As a metabolic physiologist with over 30 years of experience studying the physiology of marine and freshwater organisms, I feel highly qualified to comment upon the potential impacts of expanding the open net pen culture activities in Liverpool Bay. I have examined the metabolic physiology of a wide range of species, from scallops to trout, stickleback, Atlantic salmon and cod. I have published over 180 papers in peer reviewed journals and recently received the Canadian Society of Zoologists' lifetime achievement award (named after Fred Fry one of the pioneers of Canadian fish physiology). The research area that is most pertinent to my concerns about the proposed expansion of Kelly Cove Salmon (KCS) regards the impact of dietary assimilation of salmon feed by lobsters living in adjoining areas and the impacts of escaped Atlantic salmon on local populations of salmonids.

I am also commenting as a representative of the St. Margaret's Bay Stewardship Association (SMBSA). The SMBSA is dedicated to stewarding the marine and terrestrial ecosystems in our watershed and the communities therein. We have a vision for a vibrant, ecologically sustainable economy that supports livelihoods without degrading our environment. With direct experience of an open net pen finfish operation approximately one kilometre offshore of Bayswater Beach Provincial Park on the Aspotagan Peninsula that separates Mahone and St. Margaret's Bays, the SMBSA is qualified to comment on these applications. The Bay community has witnessed, firsthand, the damage and despoilment of the Bayswater Beach coincident with the development of the finfish culture facility. While cause and effect are difficult to ascribe in any natural situation, the temporal coincidence of the multiple closures of Bayswater Beach with fish culture activities has left Bay communities completely suspicious of and closed to further development of finfish culture in our area.

My primary concern is the impact of open net pen culture on lobster populations and on the health of the coastal ecosystems. I have read the submissions from Robinson and McKindsey and am impressed by the resources provided to examine potential impacts. Ranging from telemetry, to ROVs, to DNA profiles of gut microbiomes, it seems little effort has been spared to

show how innocuous open net pen culture is. But, I am not convinced as detailed below for I can see several levels at which salmon farms can (or could) have major effects on marine populations.

Potential direct effects of salmon farms on marine populations:

1) Pharmaceuticals and pesticides in the finfish feed:

It is apparent from Robinson's and McKindsey's studies that lobsters eat the feed provided to the salmon (much as they enjoy bait provided in fishers' traps). Effectively, lobsters near open net pens contain fatty acids that are only present in the salmon feed.

So why is it worrying that lobsters eat salmon feed? The composition of the feed is proprietary. Salmon producers add pharmaceutical agents (antibiotics, pesticides) to the feed both to reduce the amount of pharmaceuticals they need to apply and to insure they reach the salmon. The composition of the feed provided to finfish is private information. Cooke (and by extension KCS) pride themselves on being vertically integrated and having a profitable, family business. They produce the feed given to the salmon, and by extension to lobsters, rock crabs and any passing organism. Trust becomes important in these situations and this company has unfortunately lost community trust through its illegal importation of an anti-sea lice agent (brought in by barrels on a motor boat) leading to the death of many lobsters kept in a pound near their culture facility. Rather than face a legal judgement, Cooke settled out of court. The heavy fine financed research examining whether open net pens affect lobster populations. As feed composition is proprietary, what is there to prevent another situation in which Cooke adds an agent to the feed and that agent is found to be harmful to lobsters and other marine organisms?

KCS and Cooke must openly publish the composition of the feed they provide the salmon and by extension the entire ecosystem. If Cooke could prove that the feed they provide is free of pharmaceuticals and pesticides as well as free of wild fish, communities would have more faith in them.

2) The precautionary principle says: prevent harm to wild populations by NOT expanding finfish culture facilities in Liverpool Bay

Our climate is changing rapidly and the species that have supported our coastal economies are suffering. The loss of the cod fishery in the 1990's devastated many communities. Currently the lobster fishery is the most lucrative coastal enterprise in Nova Scotia. However, lobster landings are shifting and our effort based fishery may be killing the goose that laid such lovely golden eggs for Nova Scotia. Most data suggest that lobster populations are decreasing in the

southern end of the range and increasing in cooler waters further north. Catches are down in the Gulf of Maine and rising in the Gulf of St. Lawrence. Placing open net pens in inshore coastal areas that are traditional lobster areas may reduce lobster productivity and by extension harm the fishery. It is difficult to assess physiological status and future reproductive output, as alluded to by Robinson in his study. Given these difficulties, Robinson elected to examine lobster microbiomes, and found no sign of change due to proximity to culture sites. Studies of microbiomes are in their youth and proven correlations with reproductive output and physiological status are absent. So, some studies suggest that the health of lobsters and their reproductive output is affected by proximity to finfish culture, others do not show an effect. *I believe that this is when the precautionary principle should be applied to avoid harm. Expansion of finfish culture should not be permitted.*

Whereas many commercial concerns center around the valuable lobster fishery, Atlantic salmon are also native to the south shore area which concerns this application. The salmon that are cultured are genetically quite distinct from wild Atlantic salmon, as they have been selected for fast growth and later maturity. If the salmon just stayed in their cages, problems might be minimal (except for sea lice and other problems that precipitated the difficulties for the many different species of migrating salmon on Canada's west coast). However, escapes from culture facilities are frequent and can involve hundreds of thousands of fish. These fish can and do interact with local populations of Atlantic salmon and other salmonids. Increasing the numbers of culture facilities increases the risks that such unintended releases occur. *Again the precautionary principle applies: do no harm by NOT increasing the size of the culture facility.*

Given the considerable uncertainty surrounding the biological and ecological effects of an expansion of finfish culture in Liverpool Bay, I agree with our premier, the Honourable Tim Houston, in his personal opposition to the expansion of finfish culture in Liverpool Bay

I hope these arguments, together with the many others presented by my colleagues in the Healthy Bays Network have convinced you.

Sincerely yours

Helga Guderley, PhD
Boutiliers Pt, Nova Scotia.

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:45 am, Feb 13, 2024

NSARB-2023-001-WRT-129

From: [Richard Bridge](#)
To: [Aquaculture Review Board](#)
Subject: 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 – AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY.
Date: February 12, 2024 3:53:22 PM

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

I am writing to express my opposition to the expansion of private rights over the public assets at issue.

I am not a paid advocate on this issue, nor do I have a property interest in it. I write to express my personal views as a citizen and resident of Lunenburg County.

I have read many of the submissions already made, I will distill my concerns to three themes addressed by others at length:

1. Harm to Beach Meadows Provincial Park caused by increased fish waste;
2. Potential for broader ecological harm to struggling wild salmon and other species; and
3. Interference with existing and future lobster fishers in the area.

If I was in your position I would refuse the application. That outcome would be in the public interest.

Respectfully,

Richard Bridge

[REDACTED]
Pentz NS, [REDACTED]

RECEIVED

By Nova Scotia Aquaculture Review Board at 8:49 am, Feb 13, 2024

From: [Tim O'Hara](#)
To: [Aquaculture Review Board](#)
Subject: Grave Concerns Re: Expansion of Kelly Cove Salmon Ltd.
Date: February 12, 2024 3:55:08 PM

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Full name: Tim O'Hara

Place of residence: [REDACTED] Beach Meadows, Nova Scotia [REDACTED]

Relevant application: AQ#1205x, AQ#1432, AQ#1433

Reason: to voice my opposition to the planned Kelly Cove Salmon Ltd. fish farm expansion

Aquaculture Review Board

Hello,

My name is Tim O'Hara and my wife and I own a property in Beach Meadows in the Liverpool Bay area.

I am writing to the ARB to express my concern about the planned expansion of Kelly Cove Salmon Ltd. fish farm.

The existing fish farm infrastructure has already yielded many negative effects on our property and the surrounding environment. My concern is that the expansion of the fish farm will exacerbate these effects.

Examples of said negative effects include:

- millions of Styrofoam beads and other garbage items from the Kelly Cove farm facility washing up on Public Beach Meadows and our property on several occasions, necessitating a substantial volunteer clean-up effort lasting weeks;
- a change in the color of the sand on the beachfront to a much darker hue since the last expansion of the existing fish farm;
- depending on the wind a persistent and lingering odor present since the last expansion of the existing fish farm;
- the effect on thousands of local sea birds flocking to the fish farm consuming fish food that includes antibiotics and pesticides, as well consuming the displaced styrofoam beads, which is

a phenomena we have personally witnessed many times;

- both freezing conditions and overly-warm water (due to the farm's shallow depth) that have already resulted in the deaths of thousands of salmon;
- large stray, illuminated buoys that have broken away from the fish farm's infrastructure during stormy weather that have become a hazard to navigation, resulting in the coast guard having to be contacted to be made aware on multiple occasions.

We are further concerned about:

- the substantial amount of fish feces produced by the fish farm currently, and it's increase with the farm's expansion (this may be the reason for the foul smell;
- the further negative visual impact on one of the most scenic beaches in Nova Scotia, obscuring a beautiful coastal horizon with an industrial park;
- the long-term effect of the presence of the fish farm and it's expansion on the area's general habitability for both local wildlife and human beings, given the waste that we have witnessed being produced and chemicals used in the farming process.

I am deeply concerned that, because of the beach's proximity to the farm, the above-mentioned factors will not only ruin a unique site that showcases Nova Scotia's incredible natural beauty, but also negatively impact property values all along the coastline adjacent to the proposed expansion.

Thank you for reading my submission.

Tim O'Hara



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RECEIVED

By Nova Scotia Aquaculture Review Board at 8:53 am, Feb 13, 2024

February 12, 2024

Dr. Ricardo Rendon

[REDACTED]
Brooklyn, NS

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

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.

My name is Dr. Ricardo Rendon, my family vacation home is in Beach Meadows. We searched and searched the south shore of Nova Scotia for several months, looking for the best location to escape the hectic life we live. When we saw this home, we knew it was perfect for our family and for extended family to visit from Canada and also Columbia.

That was in 2011, and for the first 9 or so years it was so tranquil.

Then we noticed changes. The experiences we have dealt with in recent years is troubling.

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

Factors to be considered in decisions related to marine aquaculture sites

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;

Massive industrialization of our pristine coasts. Nova Scotia is a province of renowned beauty - beautiful beaches, clean air, people who are the nicest in the world. There is so much more we can do for our waters that surround us. Aquaculture can be in many forms beside Open Pen Dish Farms. fishery activities in the public waters surrounding the proposed aquaculture operation;

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

Persistent noise, smell, and light pollution has compromised the quality of life we once had. Noise from the existing AQ1205 can be heard. We have witnessed the large buoys breaking onto our rocks, in our yard. The beach we walk has experienced debris and styrofoam pieces a number of times.

c) the public right of navigation;

I own a boat and am a novice user, I am very concerned navigating around the existing fish farm, with the lines, buoys, I can't imagine what it will be like when there are 60 pens. I will most likely have to sell my boat, which is very unsettling for the family. I can only imagine what will happen to the other boaters in the area, several large sailing vessels.

When I heard that the Gov't and the company who operates the existing fish farm were moving forward with the application to expand this, I was appalled at the very thought of how can anyone consider this. Nova Scotia is a beautiful province with pristine waters, bays, and amazing beaches. This industrialization of our coastal communities is not the answer for a sustainable future. Please do not accept this application.

Regards,

Dr. Ricardo Rendon

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:10 am, Feb 13, 2024

Clerk of the Nova Scotia Aquaculture Review Board
60 Research Drive
Bible Hill, NSB6L 2R2

Email: Aquaculture.Board@novascotia.ca

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

Attention: Nova Scotia Aquaculture Review Board,

Please accept my letter opposing the expansion of Kelly Cove Salmon/Cooke Aquaculture in Liverpool Bay. My comments relate to Factor 2 - *The contribution of the proposed operation to community and provincial economic development* as set out in section 3 of the Aquaculture Licence and Lease Regulations.

I am the broker of Land & Sea Real Estate Services Inc which I have owned and operated since 1997. I have lived in Queens County since 1995 and have been a licensed real estate agent in NS since 1995. I chose to live in Queens over Lunenburg County because Queens offered a superior outdoor environment including exceptional beaches, rivers and parks. For many years, my business was focused almost exclusively on coastal Lunenburg County as Queens County proved to be a very tough sell to potential buyers, both because of a dearth of quality product and reputation for dirty industry. This has changed. Queens has come a long way. For the past 10 years most of my real estate sales have been transacted in Queens County.

Prior to the closure of Bowater pulp & paper in 2012, pollution was a huge deterrent to purchasers considering Queens. After all, who wants to look at smoke stacks on the waterfront? With the repurposing of the Bowater property into Port Mersey Commercial Park and a focus on more environmentally-friendly industries, Queens went from being the biggest polluting county in NS to one of the cleanest. It took years to change the image and reputation of Queens and get the message out there - that Queens is clean and a desirable place to be! We can not and should not mess that up.

Queens generates significant revenue from deed transfer tax and property tax revenues resulting from coastal property sales which tend to be at the higher end of the price spectrum. Fin fish farms don't pay property taxes. Coastal property buyers do not want to look at industrial fish farms or deal with their potentially adverse affects, whether aesthetic or financial. Property values will be adversely affected if this application is approved. Buyers will go elsewhere and sellers will suffer financially to the extent the buyer pool diminishes. The Region of Queens, in turn, will have to raise tax rates to cover revenue shortfalls from lower property tax assessments.

[REDACTED]

Our Queens County beaches are very special and, unlike some locations in NS, we have not had any shutdowns due to bacteria counts or green algae. We care about our waterfront and our beaches. We pick up our dog poop. We don't allow human waste to enter waterways. Feces and pollution from these ocean fish farms are disgusting, unhealthy and off-putting for both potential buyers and existing residents. With such a focus on the environment worldwide, how can anyone justify the amount of excrement from fish farms entering our oceans? Where we swim?

Think about the abandoned oil wells out west, the tailing ponds, tar sands in Cape Breton, the Northern Pulp mess, millions being spent getting rid of plastic from our waters. Along the LaHave River, fecal testing of the river by a 12 year old girl was the catalyst that lead to eradicating sewage straight pipe systems. Those problems are well known - now. Would we have allowed those things to occur had we known? Would we have required the perpetrators to post bonds for future cleanup? Do we really know the longterm affect of fin fish farms? Who will clean up the mess in years to come? Is it worth the risk? For a handful of jobs? Where are the benefits to Queens?

Tourism employs far more people in Queens than Cooke and their various subsidiaries do. We cannot risk the issues that these farms bring - to our beaches, our tourism, our lobster fishing and real estate sectors.

Ocean fin fish farms are bad for real estate sales, bad for property values, bad for our beaches and bays, harmful to tourism (a major contributor to our local economy) which in turn affects real estate, and bad for our environment. The risk/reward ratio is off the scale.

Please reject this proposed fish farm expansion.

Your truly,

[REDACTED]
75E7D8D1E55F4FD...
Sheila Sinnott, Broker, Owner
Land & Sea Real Estate Services
[REDACTED] Charleston,
NS, [REDACTED]
[REDACTED]

cc: Premier, Hon. Tim Houston - Premier@novascotia.ca
Min. of Public Works, Hon. Kim Masland - Kim.maslandmla@gmail.com
Min. of DFA, Hon. Kent Smith – Mindfa@novascotia.ca
Hon. Rick Perkins - rick.perkins@parl.gc.ca
Mayor Darlene Norman - dnorman@regionofqueens.com

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:17 am, Feb 13, 2024

NSARB-2023-001-WRT-133

February 9, 2024

Covey Island Boatworks

Brooklyn, Nova Scotia

Canada

Phone:

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

email: Aquaculture.Board@novascotia.ca

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 AQ#1205x, AQ#1432, AQ#1433 in LIVERPOOL BAY, QUEENS COUNTY

Dear Clerk and Board,

Please accept the following letter in opposition to the proposed expansion of Kelly Cove Salmon Ltd. in the Liverpool Bay. Our concerns relate to **factor 6) The public right of navigation** as listed in Section 3 of the Aquaculture License and Lease Regulations.

Covey Island Boatworks (Lunenburg County Shipwrights Incorporated, est 1979) is an award-winning builder of custom and semi-custom power and sailing vessels since 1979. In 2016 Covey Island Boatworks opened a boatyard in Port Mersey Commercial Park, situated in Herring Cove on Liverpool Bay, Brooklyn, including a 16,000 sf facility, offering both products and services to boat owners. The boatyard employs skilled workers who specialize in repairs and custom building of vessels for private and commercial use including lobster boats, motor yachts and sailing cruisers, and are distributors of boat motors, gear and accessories. On choosing to expand the operations at the Port Mersey location, Al Hutchinson, President of Covey Island Boats says: "Over the past several years, demand has skyrocketed for new boats in the commercial fishing industry, with a 3-4 year wait at this point. This is an opportunity for us to fulfill a need, especially for lobster fishermen".

We are opposed to the expansion of KCS's net pen operations in Liverpool Bay which will negatively impact many of our boating customers. Covey Island Boatworks is concerned that the scale of the three, 40ha sites will restrict safe boating access, particularly for sailing vessels. We believe that the presence of these massive, industrial sites will have an immediate negative impact on the appeal of the bay for visiting boaters, many traveling from International ports, who are likely to bypass Liverpool Bay for more attractive locations along the South Shore.

We have some customers from the US and Europe who spend considerable time here, while having their boats worked on by our company, not being able to boat in the affected areas will impact their decision to come to our yard for work.

Please reject this proposed application, protect Liverpool Bay.

Sincerely,
Covey Boat Works

cc:

Hon. Tim Houston, Nova Scotia Premier | Premier@novascotia.ca

Kim Masland, MLA Queens-Shelburne | kim.maslandmla@gmail.com

Darlene Norman, Mayor, Regional of Queens | dnorman@regionofqueens.com

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:24 am, Feb 13, 2024

From: [Barry J Olivella](#)
To: [Aquaculture Review Board](#)
Cc: [Premier](#); [Minister DFA](#); [Public Works Minister](#); [Minister, Env; Health and Wellness Minister](#); [Economic Development Minister](#); [ca@zachchurchill.com](#); [leader@greenpartyns.ca](#); [garyburrillmla@gmail.com](#); [rick.perkins@parl.gc.ca](#); [justin.trudeau@parl.gc.ca](#); [DFO.Minister-Ministre.MPO@def-mpo.gc.ca](#); [ministre-minister@ec.gc.ca](#); [ministerofred-ministreduder@ised-isde.gc.ca](#)
Subject: Kelly Cove Salmon Ltd. Application for Boundary Amendment and Two new Marine Finfish Aquaculture Licenses and Leases for the cultivation of Atlantic Salmon in Liverpool Bay, Nova Scotia
Date: February 12, 2024 4:16:50 PM
Attachments: [NSARB-Feb 11, 2024.pages](#)

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

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Good afternoon,

We are enclosing a letter submission to the Nova Scotia Aquaculture Review Board in connection with the upcoming hearing in Liverpool, Nova Scotia in March. Attached please find a digital version in Apple Pages as well as a version in text in case the digital version is not accessible by your system

Yours sincerely,

Barry Olivella and Barbara Olivella

February 11, 2024

Barry Olivella And Barbara Olivella

[REDACTED] formerly Eagle Head Wharf Rd
 Brooklyn, Nova Scotia

E-mail: [REDACTED]

By email, original to follow by Canada Post Registered Mail

Clerk of the Board
 Nova Scotia Aquaculture Review Board
 60 Research Drive
 Bible Hill, NS B6L 2R2
 E-mail: 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.

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

For the reasons articulated below, we are asking the Nova Scotia Aquaculture Review Board (“Board”) to refuse to grant Kelly Cove Salmon Ltd. “(Kelly”) the **BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH AQUACULTURE LICENSES AND LEASES** for which Kelly has made application.

By way of background we, Barry Olivella and Barbara Olivella, are University graduates with degrees in economics, we have been Nova Scotia residents for over twenty years and we are the owners of a 24 acre property that comprises a substantial portion of of the North East side of Eagle Head Bay. Our property is located in a straight line across the water with plain sight of Kelly’s existing Finfish open-pen operation and its proposed expansion in Liverpool Bay. Eagle Head Beach is directly in front of our property for which the civic address is [REDACTED] and comprises PID numbers [REDACTED] and [REDACTED]. Circa 1830 our property was granted to [REDACTED], it constituted the first settlement at Eagle Head and has been continuously occupied since that time.

As the Board will appreciate, this property is DIRECTLY affected by the existing Kelly operation.

It is our understanding that pursuant to 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;
- 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;
- d. the other users of the public waters surrounding the proposed aquaculture operation;
- e. the public right of navigation;
- f. the sustainability of wild salmon;
- g. the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation;

We present our views below on each of these factors.

The optimum use of marine resources

Our view is that the “**optimum use of marine resources**” does not in itself constitute a “factor” to be taken into account by the Board. Rather, it has the inherent characteristic of a conclusion to be reached by the Board based on all of the other factors specified in Section 3. In other words, the application of straightforward logic can only lead to one conclusion: whether or not the expansion proposals by Kelly would constitute the “optimum use” of Liverpool Bay as a marine resource is a subjective judgement that can only be made by the Board after it has weighed all of the facts.

We wish to point out to the Board that the comments in the above paragraph should not be interpreted as referring to a semantic difference. Rather we are raising a matter of real substance that should be considered by the Board and its legal advisors in relation to the conduct of the upcoming hearings.

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

As the Board must well know, the number of employees engaged directly in open-pen operations is relatively small, usually a handful, and Kelly’s operation is no different. In fact,

the number of people engaged in other business activities in the Liverpool area in the fishing industry, leisure, tourism and service industries is many times the number that are or could be employed by Kelly. In fact, there is a very good argument that those other activities are currently negatively affected by Kelly's existing operations and that any expansion of Kelly's operations would have an additional substantial negative effect on the overall employment in the area, particularly in tourism - and especially as a consequence of the negative publicity following any approval of the Kelly application by the Board.

In the past we understand that Kelly has indicated to the Province of Nova Scotia its intention to process in Nova Scotia the fish produced in its Nova Scotia finfish open-pen operations. This intention reportedly has not been implemented and we understand that Kelly continues to process such finfish outside of this province in a facility that has ample capacity to continue to do so notwithstanding the possibility of increased production from Nova Scotia.

In view of the recent decision by the governments of Canada, British Columbia, Washington State, Chile and elsewhere to limit or completely close down open-pen finfish aquaculture, it is clear that a worldwide trend is underway to put an end to such operations. The stated reasons for this are multiple, but they are based on the fact that the overall costs to society resulting from the associated and well documented pollution, and the effects on wild fish species, the fishing industry and tourism among others exceed the economic benefits claimed by the industry. The situation in Nova Scotia is no exception and it is incumbent on the Board to take this into account.

In all of the circumstances there is a very strong case that the overall contribution of the proposed Kelly expansion in Liverpool Bay to the community and the province of Nova Scotia is negative. Any suggestion through the presentation of cherry picked data to the effect that continued expansion of finfish open-pen aquaculture in Nova Scotia will contribute to the economic development of the province has a hollow ring and is manifestly without merit.

Fishery activities in the public waters surrounding the proposed aquaculture operation

There are today two main types of fishery activities in and around the area that Kelly proposes for expansion of its open-pen finfish operation in Liverpool Bay.

As the lobster fishermen in the area will attest, those waters contain a significant lobster population that benefits not only the fishermen, their crews and families directly, but also the lobster processors and distributors, as well as their myriad suppliers of boats, mechanical and electronic equipment, fuel and lubricants, repairs, transport etc.

That same area of relatively protected waters is also fished by local residents who rely to some extent on their catch for sustenance who also rely on many of the same suppliers that service the fishing vessels.

In the circumstances it is disingenuous to suggest that the existing fishery activities in Liverpool Bay can easily or safely be relocated to other locations that are less accessible and protected than Liverpool Bay.

The oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation

We are not oceanographers, but we are aware that Liverpool Bay has a relatively shallow depth - in the range of 60 ft. As a consequence of this shallow depth, the water temperatures can vary significantly as a result of climate conditions. During a period of cold weather a few years ago that temperature plummeted so low that there was a significant die-off of the fish population in Kelly's open-pens. While the actual number of fish that died may be somewhat unclear, that event was reported by the company. It does not take an expert to conclude that such an occurrence indicates that, if any waters are suitable for open-pen operations, deeper water where the sea temperature is more stable would be more appropriate. To sum up, Kelly's own report on that fish die-out event presents irrefutable evidence that the shallow waters of Liverpool Bay are unsuitable not only for Kelly's existing open-pen finfish operations, but also for the expansion for which Kelly has applied.

The shallow waters of Liverpool Bay also present a number of biophysical problems in that the depth of Kelly's existing and proposed additional open-pens is such that the solid effluents from those pens are deposited in a relatively small area of seabed a few feet directly below the pens. It has been reported that research shows that the effluent area is devoid of fish life. This is in itself significant. In addition, those effluents have been proven to constitute a cesspool of bacterial growth that can be in itself a pollutant to the surrounding waters. Furthermore, it has been observed that in shallow waters such as Liverpool Bay the tides do not have much effect in terms of flushing those effluents out into the open sea. Accordingly, it is evident that the biophysical characteristics of Liverpool Bay are inappropriate for both Kelly's existing open-pen operations and for their proposed expansion.

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

As everyone in the local population, and indeed many other Nova Scotians, know there is near and upwind (in the prevailing winds) of the existing Kelly open-pen finfish operation the Beach Meadows beach - a wonderful pristine sandy beach that is enjoyed by many. The expansion proposed by Kelly would also be in close proximity of that beach. In view of the fact that the typical open-pen finfish operation has been estimated to produce untreated sewage effluent roughly equal to that of a city of 65,000 people, there is no logic to the suggestion that we should locate such a significant source of environmental pollution as an open-pen finfish operation close to Beach Meadows. Such a location is also inappropriate from a visual viewpoint as it would be a constant reminder to both Nova Scotians and tourists that protection of our precious beaches is not a priority.

In addition to the Beach Meadows beach, as we mentioned at the outset of this letter, Eagle Head Beach is in a straight line from and has plain sight across the water of the existing Kelly operation and the proposed expansion. Liverpool Bay and Eagle Head Bay are adjoining in a north easterly direction not far from Beach Meadows. Eagle Head Beach may be less well known, but it constitutes acres of sand and shallow water that is used by many for walking, swimming and extraction of clams, it is exposed to the environmental and visual effects of Kelly's existing and proposed operations and it is often subject to wind and waves from the direction of Kelly's operations.

The wind and wave proximity of Eagle Head Beach to the existing Kelly operation was demonstrated a few years ago on a windy day in summer when three of the Olivella grandchildren emerged from playing in those waters with a very significant number of sea lice clinging to their skin - in the order of perhaps 100 sea lice on each child. The wind that day was from the direction of Kelly's operations and that number of sea lice could only have

originated from the level of infestation that has been found to be common in open-pen finfish operations - and the Kelly operation was the only one in the vicinity.

The public right of navigation

Unlike some other bays on the South Shore, for example Shelbourne Bay, Liverpool Bay is not a large expanse of water, but rather somewhat restricted in comparison and on a seasonal basis there is often significant fog. Navigating in those waters are inshore fishing vessels and offshore commercial fishing vessels as well as local recreational fishermen in small boats and recreational sailboats and power boats many of which use the Bay to access wharves at or near Liverpool, including the Liverpool Yacht Club and the fish processing plant at Liverpool. Depending on the time of day and the season, many of the inshore fishing vessels are relatively stationary as they check their lobster traps and it is a similar case for recreational fishing vessels. Any additional obstruction including, for example, the existing Kelly operation, presents an added hazard to navigation. Adding the proposed additional forty-four open-pens to the existing fourteen in the Kelly operation is unwise as it will serve to accentuate Kelly's negative impact on the public right to navigation in Liverpool Bay.

The sustainability of wild salmon

It is a proven fact that the wild salmon population in our Nova Scotian waters, and indeed in the adjacent Atlantic waters, over many years has declined massively. Notwithstanding that decline, there are significant ongoing efforts in this province, by both the government and other organizations, to rebuild the wild salmon habitat and to eliminate obstacles generally to rebuilding that population. It is an established fact that open-pen finfish salmon differ genetically from wild salmon, that open-pen salmon do escape into the sea, sometimes in large numbers, and that the interbreeding of the different species has a detrimental effect on the ability of the wild salmon to prosper. While our wild salmon population is small, the existence and expansion of open-pen finfish salmon in Nova Scotia present a risk to the eventual recovery of our wild salmon population. It is unacceptable to shoulder that risk.

The number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation

In the analysis set out above we have explained in layman's language many of the reasons why application by Kelly's to expand its finfish open-pen operations in Liverpool Bay should be refused by the Board. No doubt experts in various fields will present more detail and additional such reasons to the Board. Indeed, the reasons for the Board to refuse the expansion apply equally to the number and productivity of Kelly's existing aquaculture sites in the public waters surrounding Kelly's proposed expansion of its aquaculture operation.

In all of the circumstances it is clear to us that "the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation" are irrelevant to the decision of the Board in its determination as to whether the expansion proposed by Kelly represents "the optimum use of marine resources".

In closing, for all of the reasons that we have cited in this letter, we respectfully ask the Nova

Scotia Aquaculture Review Board to refuse to grant Kelly Cove Salmon Ltd.
“the **BOUNDARY AMENDMENT and TWO NEW MARINE FINFISH
AQUACULTURE LICENSES AND LEASES** for which Kelly has made application.

Yours sincerely,

Barry Olivella

Barbara Olivella

CC: Hon. Tim Houston, Premier of Nova Scotia

CC: Hon. Kent Smith, Minister of Fisheries & Aquaculture

CC: Hon. Kim Masland, MLA Queens/Minister of Public Works

CC: Hon. Tim Halman, Minister of Environment

CC: Hon. Michelle Thompson, Minister of Health & Wellness

CC: Hon. Susan Corkum-Greek, Minister of Culture, Comm., Tourism & Heritage

CC: Hon. Zach Churchill, Nova Scotia Liberal Caucus Office

CC: Anthony Edmonds, Green Party

CC: MLA Gary Burrill, NDP Caucus Office

CC: MP Rick Perkins, MP South Shore - St Margarets

CC: RT. Hon. Justin Trudeau, Prime Minister of Canada

CC: Hon. Diane LeBoutillier, Minister of fisheries & Oceans

CC: Hon Steven Guilbeault, Minister of Environment and Climate Change

CC: Hon. Gudie Hutchings, Minister of Rural Economic Development

RECEIVED

By Nova Scotia Aquaculture Review Board at 9:37 am, Feb 13, 2024

From: [Rolfe Jones](#)
To: [Aquaculture Review Board](#); [Premier](#); [Minister DFA](#); [Minister, Env](#); [Health and Wellness Minister](#); [Economic Development Minister](#); [Kim Masland](#); garyburrillmla@gmail.com; justin.trudeau@parl.gc.ca; [DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca](#); ministre-minister@ec.gc.ca; ministerofred-ministreduder@ised-isde.gc.ca
Subject: Protect Liverpool Bay!
Date: February 12, 2024 4:17:54 PM
Importance: High

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February 12, 2024

Members of the Nova Scotia Aquaculture Review Board

Via email

Hon. Tim Houston

Premier of Nova Scotia

PREMIER@novascotia.ca

Hon. Kent Smith

Minister of Fisheries & Aquaculture

MINDFA@novascotia.ca

Hon. Tim Halman

Minister of Environment

Minister.Environment@novascotia.ca

Hon. Michelle Thompson

Minister of Health & Wellness

Health.Minister@novascotia.ca

Hon. Susan Corkum-Greek

Department of Economic Development

edminister@novascotia.ca

Kim Masland

Minister of Public Works - MLA Queens

Kim.maslandmla@gmail.com

MLA Gary Burrill

garyburrillmla@gmail.com

Anthony Edmonds

leader@greenparty.ns.ca

Rt. Hon. Justin Trudeau

Prime Minister of Canada

justin.trudeau@parl.gc.ca

Hon. Diane LeBouthillier

Minister of Fisheries & Oceans

DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca

Hon. Steven Guilbeault

Minister of Environment and Climate Change

ministre-minister@ec.gc.ca

Hon. Gudie Hutchings

Minister of Rural Economic Development

ministerofred-ministreduder@ised-isde.gc.ca

Dear respected Members of the Nova Scotia Aquaculture Review Board and Elected Officials,

I am writing today in support of the *Protect Liverpool Bay* initiative and I am not in support of having fish farms in our bay – in fact anywhere else in our open waters in and around Nova Scotia. They should be on land and far better regulated.

Fish farms add little value to our local economy, but potentially can have a huge negative effects on other important local economies - such as traditional fisheries and tourism - that are larger, generate greater economic return to our workers and tax rolls, are less disruptive, and more environmentally friendly.

I believe in economic diversification but not at the price that we'd have to pay by having a giant fish farm in our bay.

The magnitude, geographic extent, duration, frequency, degree of reversibility, and possibility of occurrence of the effects caused by open net pen fish farms along our shores have the potential to be significant and cumulative. One would hope that our federal and provincial governments - along with the Nova Scotia Aquaculture Review Board - would apply the precautionary approach, and the wisdom of the First Nations people when making decisions, in particular looking ahead seven generations to see what harm fish farms would levy on our shores and our environment.

It seems to me that there is a potential upside if “we” encourage the migration of fish farms to sustainable, land-based locations/operations. Cooke Aquaculture is no small company and has huge political heft. It also has the financial wherewithal to support land-based fish farming. If everyone has an eye to the future let's become the global leader of close looped systems on land and become not only a net exporter of properly raised and healthy fish but also be a net exporter of these closed loop systems to countries around the world who need them.

But today – please get them out of our bay!

Thank you & respectfully,

Rolfe Jones

[REDACTED]

Liverpool, Nova Scotia

[REDACTED]

From: [Dawn Robertson](#)
To: [Aquaculture Review Board](#)
Subject: Fwd: Aquaculture
Date: February 12, 2024 4:43:51 PM

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Sent from my iPad

Date: February 12, 2024 at 1:57:40 PM AST
Subject: Aquaculture

Aquaculture.board@novascotia.ca

I, Dawn Robertson along with my husband Gary Robertson, reside at [REDACTED] Brooklyn, NS would like to express our concern regarding an application made by Kelly Cove Salmon Limited for a boundary amendment and 2 new marine fin fish aquaculture leases and licences # 1205x, (existing but currently over approved limit,), 1432 and 1433 in Liverpool Bay.

The proposed pens with be run on diesel and have lights on them all night. They are very noisy and will contribute to noise and light pollution

They will not only be unsightly and ruin our ocean view but will decrease our property value significantly.

Everyone visiting our property comments on our beautiful view and tell us how lucky we are to live in such a beautiful area.

Liverpool Bay attracts many professionals and permanent new comers to our community, attributing to its growth.

Beach Meadows Beach and Liverpool Bay have always been popular tourist destinations. The bay is shared by many recreational and commercial boats. The farms will pollute the beach and restrict navigation in the harbour. We love to watch the sail boats and fishers move through our harbour

We also feel the proposed pens will affect the clarity of the water in Fralic's Cove and diminish the area available for Lobster Fishers holding pens and transmit potential diseases.

This is not intended to debate fish farms but why do they need to be located them close to shore in the mouth of our harbour? Could they not be located on the Atlantic side of Coffin's Island or on land.

The farm provides no local jobs or tax revue to our community. We feel the proposed expansions will greatly diminish our property and quality of life as we spend many hours outside on our deck in the summer.

Please consider those of us who live on shore when making your decision

Yours truly

Gary and Dawn Robertson

Sent from my iPad

RECEIVED

FEB 12 2024

NS Aquaculture
Review Board

Michael and Glenda Lohnes

[REDACTED]
Liverpool, NS
[REDACTED]

Aquaculture Review Board
60 Research Dr.
Bible Hill, NS
B6L 2R2

RE: ARB – Lease #1433 and #1432

ARB Panel Members,

My property is located in Mersey Point, approximately 100-150 meters directly overlooking proposed AQ # 1433 site, and directly across Liverpool Bay from AQ #1432 site.

I am 71 years old, and have lived most of my life at [REDACTED], Mersey Point. My family moved here in 1962, and we have enjoyed the pristine ocean views and peace and quiet for 61 years. We are gravely concerned that the 40+ hectare fish farm proposal, which will have a large diesel generated feeder barge directly in front of my home, will ruin the tranquility we have enjoyed for decades. My wife and I are avid gardeners and enjoy frequent walks to her beachfront via an access path I created many years ago.

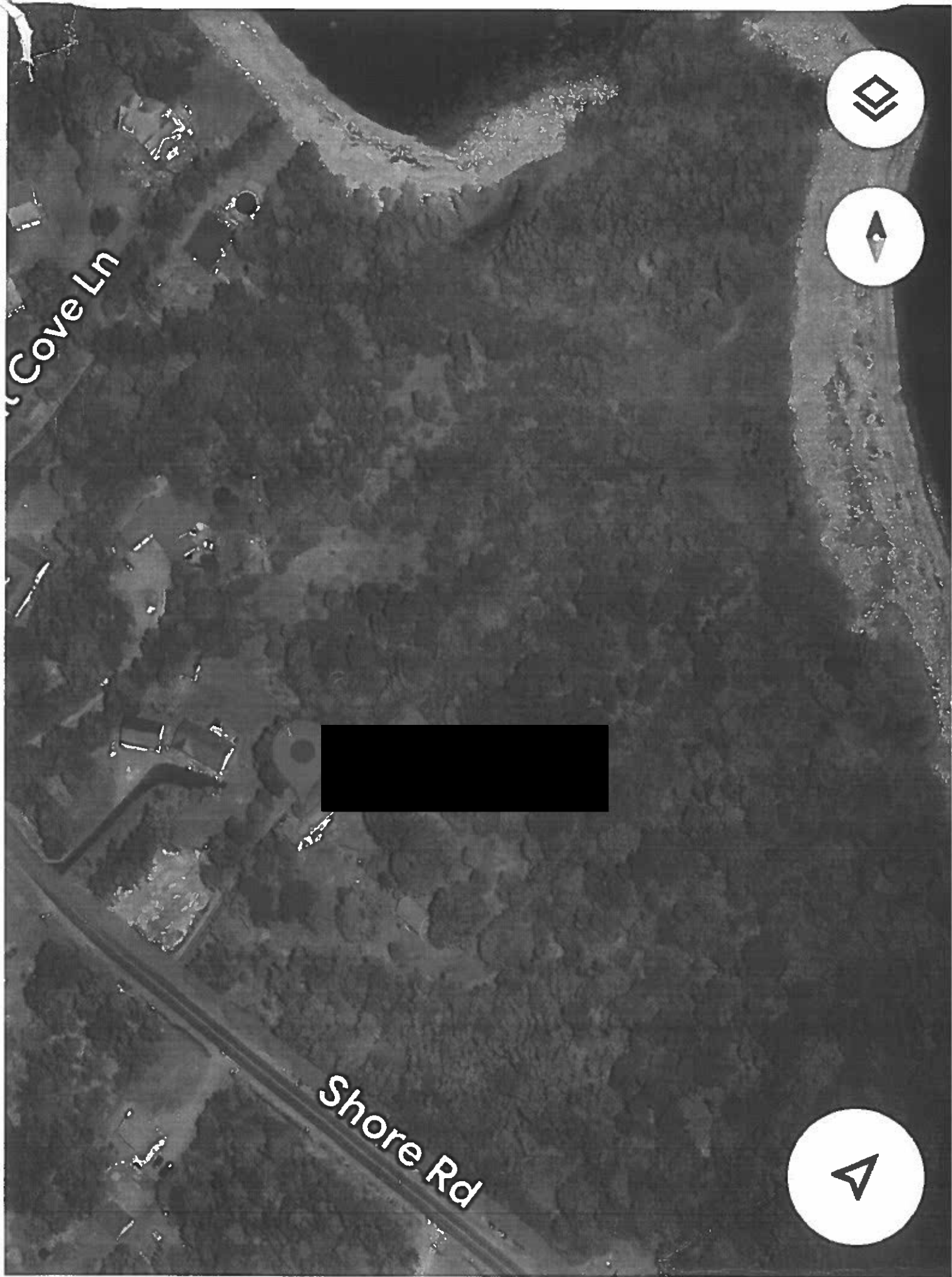
Our primary concerns include; excessive noise, bright lights, odour, debris and pollutants such as feed and feces washing up on our property. The data used in the application is very limited and outdated. The data certainly doesn't reflect the significant change in recent years regarding severe and unpredictable storms and weather patterns, which have definitely had an impact on our 15+ acres of oceanfront property and according to climatologists will likely worsen in the future.

The presence of twenty open pen fin fish cages and the attached noisy feeder barge will most certainly negatively impact our enjoyment of our property. In fact, it will definitely influence whether or not future generations of our family will choose to live in the family home.

Please reconsider placing this industry in front of our tranquil home.

Respectfully Submitted

Michael Lohnes
[REDACTED]





SHORE RD

Figure 63. Mersey Point (Proposed) Site Development Plan Showing Cage Configuration

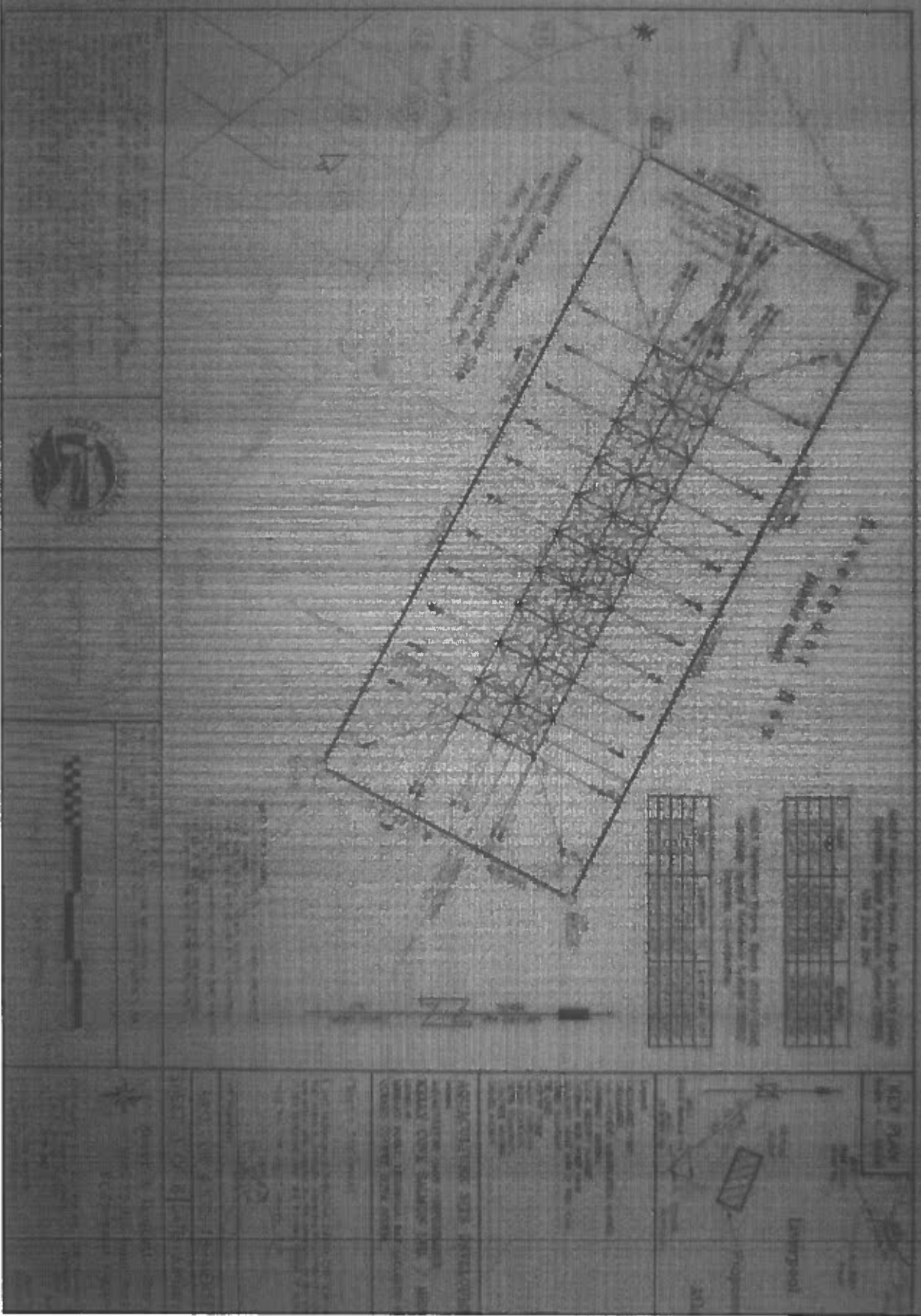
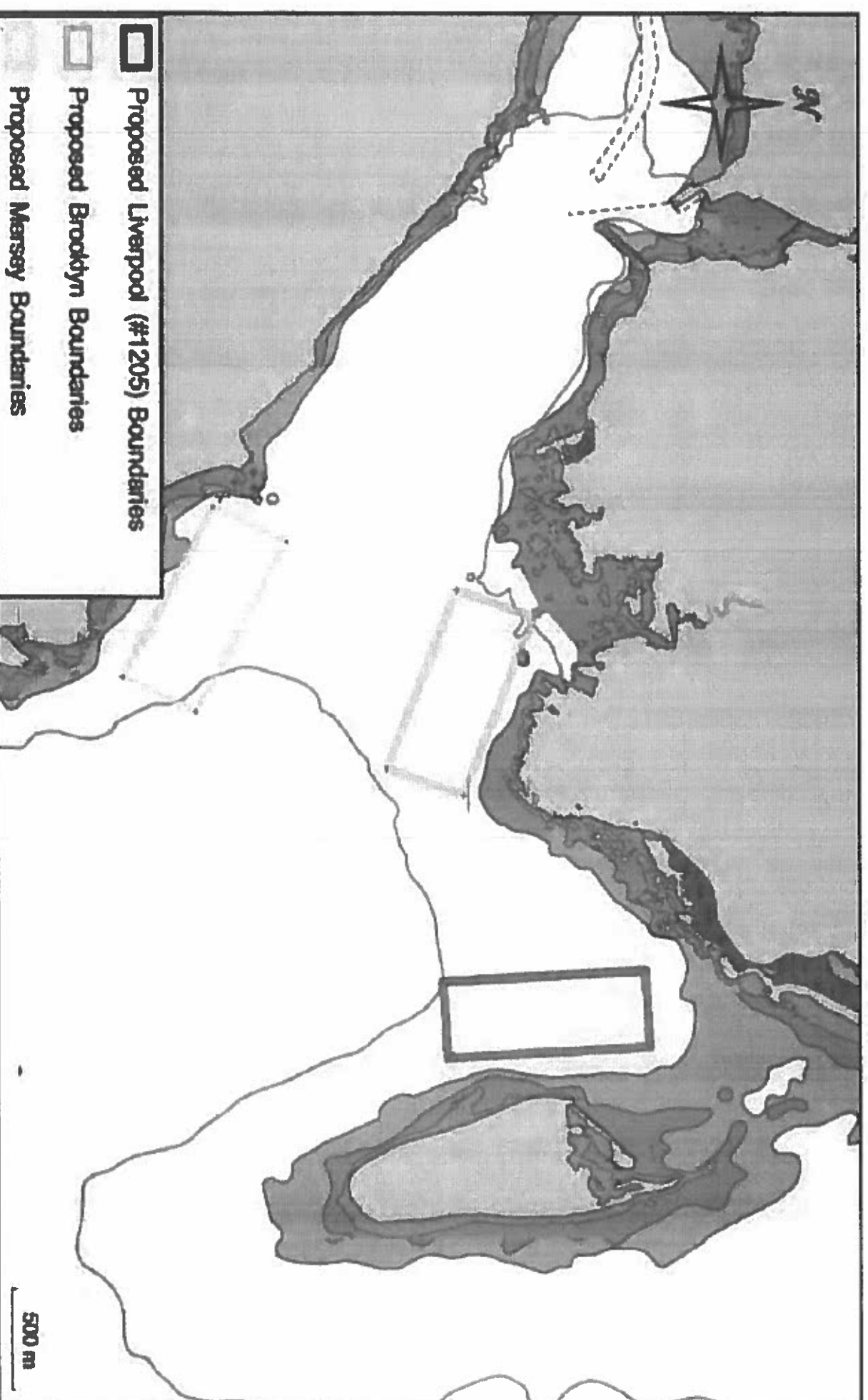


Figure 1. Proposed Lease Boundaries in Liverpool Bay



FEB 12 2024

NS Aquaculture
Review Board

Nov 18, 2023

LaDonna Fisher

[REDACTED] Hunts Point NS

[REDACTED] Ph: [REDACTED]

To Whom it may concern:

My concern are mainly related to factor 8.

The open pen fish farming taking place in Nova Scotia waters has been concerning to me since observing the effects on Carter's Beach on Port Mouton Harbor.

As a permanent resident of Queen's County and original Port Mouton, I have spent many hours on our beaches and ocean. I loved the clean, pristiness that the ocean provides our area. As I kayaked along the shores and out to Spectacle Island, Jackie's Islands, Minic Island and Port Mouton Island, I enjoyed looking down to the sand and rock bottom. Seeing the changing seascapes caused by the currents of our harbour.

Once the open pen fish farming started is when I noticed a dark sludge covering the bottom of the ocean, plant life, rocks and seaweed. This sludge also washed up on our beaches, Summerhill and Carter's. There appeared to be less wildlife and sea life in our ocean and on our shores.

The local lobstermen noticed where there were always plentiful catches, the count was down in areas the sludge collected. The inlet on Spectacle Island had a brown sludge coating the shallow waters. The locals and Nova Scotia rallied. The negotiation started. Five years later the area is cleaning itself. The wonderful Ocean is healing. And NOW you want to expand in Liverpool Harbour. I fear for the delicate ecosystem. Please say no to open pen farming — LaDonna Fisher

Barbara Campbell
[REDACTED]

Port Mouton, N. S.
[REDACTED]

RECEIVED

FEB 12 2024

**NS Aquaculture
Review Board**

February 6, 2024

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

Re: The application by KELLY COVE SALMON 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 Chair and Board:

I am writing to make my concerns about this fish farm expansion known. My family and I have lived in Queen County our whole lives. Many of my family members have been fishermen for their whole lives.

The proposed Mersey Point site AQ#1433 is in our local area.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

Many members of my family fish for lobster in Liverpool Bay, Port Mouton Bay and surrounding areas. They also fish for herring, mackerel and groundfish. Their livelihoods are entirely dependent on a healthy ecosystem and sustainable fisheries. The two new sites at Mersey Point and Brooklyn and expanded Coffin Island site will hinder their ability to fish the harbour safely and will damage the habitat for many species of creatures.

Section 3 – Factor 1): The optimum use of marine resources:

I don't think that a huge 60 pen fish farms is the best use of our marine spaces. Liverpool Bay and port Mouton Bay is already being used optimally, sustainably by many people in many

ways. Please do not allow Cooke's to displace our fishers (Commercial and Aboriginal), our plant harvesters, our recreational boaters, our divers, our sailors, our kayakers, our beach goers. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. These sites are planned for very shallow waters that will not flush well. We do not have the strong tides that the Bay of Fundy has.

If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically decreased. Our community will pay the highest price if this experiment fails. Why ruin our marine habitat for a business that will pollute the bay and then walk away without cleaning up their mess. I want to see our local businesses continue to thrive and our community healthy for the sake of all of those involved.

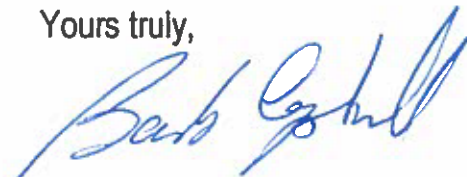
There has been only one public meeting, five years ago, to voice our concerns. Why is this? The community should have a say in whether or not our waterways are damaged by companies from other provinces and other countries. As these companies are kicked out of other countries it will put more pressure on Nova Scotia. We need to put a stop to this industry before they are in several shallow harbours in Nova Scotia.

This province is one of the last places that has "clean" water. Please do not allow our water to be poisoned with fish farm waste and chemicals. If fish farms are being closed down on the West coast of Canada they should be closed down here as well. We do not want to be treated like the "poor cousin" that has to accept pollution just to benefit Multi National Corporations that take most of their money elsewhere.

Thank you for considering my objections to this Cooke Aquaculture expansion in my community.

I am opposed to Open Fish Farming. I would however be open to land based Fish farming.

Yours truly,



Barbara Campbell

RECEIVED
FEB 12 2024
NS Aquaculture
Review Board

NS Aquaculture Review Board
60 Research Dr.
Bible Hill, NS
B6L 2R2

February 8, 2024

Re: Application by Kelly Cove Salmon Ltd for a boundary amendment and two new fish aquaculture licenses and leases for the cultivation of Atlantic salmon. AQ # 1205x AQ # 1432 AQ# 1433 in Liverpool bay, Queens County, Nova Scotia.

I am a home owner in the area that will be affected by this application therefore have a direct economic, legal, and personal interest in this matter. I am currently building a new home in the area directly across from the area referred to as AQ# 1433. The granting of the application for expansion will directly affect my property value.

Consideration must be given to the current use of this area. This includes lobster fishing, local native fishery and sport fishery. It also supports local Irish moss harvesting and a surfing community.

This expansion according to DFO could increase the number of escapees into the local water system. This could affect local river systems up to 200 kms in the surrounding area on either side of the bay. This would result in the risk of interbreeding with wild salmon stocks. Wild Atlantic salmon are already in trouble and do not need another risk factor.

Scientific evidence has clearly shown that salmon fish farm

aquaculture poses a very serious danger to wild salmon stocks and other marine life. More feed and waste products in combination with increased marine traffic suggests a high potential for cumulative effects on water conditions. Low oxygen levels caused by smothering sediments have occurred at the already existing nearby location. Escaped farm salmon displace wild stock from their traditional habitat. Any threat to our marine resources or salmon stocks is a direct threat to our environment. A fish farm is equivalent to having an untreated sewage facility on our shores. Pollution and effluent flow freely from fish pens and cause most resident species of fish and marine life to decrease in numbers.

KCS and Cooke Group have proven themselves to be less than reliable. They have been heavily fined in the states of Maine and Washington. Their operations in Washington State have been closed down for their history of failing to comply with contracts and breaches of under reporting. They have been fined \$500,000 for illegal use of pesticides, \$332,000 for pen collapse and over \$2,000,000 for net pen collapse.

This is a multi national company that is being chased off the west coast of Canada and US for practices that do not conform to good environmental practices. We do not want them destroying the waters of Liverpool Bay .

Yours truly,

James Jewkes
Moose Harbour, NS



Ron Campbell
[REDACTED]
[REDACTED]

Port Mouton, N. S.
[REDACTED]

RECEIVED
FEB 12 2024
NS Aquaculture
Review Board

February 6, 2024

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

Re: The application by KELLY COVE SALMON 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 Chair and Board:

I am writing to make my concerns about this fish farm expansion known. My family and I have lived in Queen County our whole lives. Many of my family members have been fishermen for for their whole lives.

The proposed Mersey Point site AQ#1433 is in our local area.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

Many members of my family fish for lobster in Liverpool Bay, Port Mouton Bay and surrounding areas. They also fish for herring, mackerel and groundfish. Their livelihoods are entirely dependent on a healthy ecosystem and sustainable fisheries. The two new sites at Mersey Point and Brooklyn and expanded Coffin Island site will hinder their ability to fish the harbour safely and will damage the habitat for many species of creatures.

Section 3 – Factor 1): The optimum use of marine resources:

I don't think that a huge 60 pen fish farms is the best use of our marine spaces. Liverpool Bay and port Mouton Bay is already being used optimally, sustainably by many people in many

ways. Please do not allow Cooke's to displace our fishers (Commercial and Aboriginal), our plant harvesters, our recreational boaters, our divers, our sailors, our kayakers, our beach goers. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. These sites are planned for very shallow waters that will not flush well. We do not have the strong tides that the Bay of Fundy has.

If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically decreased. Our community will pay the highest price if this experiment fails. Why ruin our marine habitat for a business that will pollute the bay and then walk away without cleaning up their mess. I want to see our local businesses continue to thrive and our community healthy for the sake of all of those involved.

There has been only one public meeting, five years ago, to voice our concerns. Why is this? The community should have a say in whether or not our waterways are damaged by companies from other provinces and other countries. As these companies are kicked out of other countries it will put more pressure on Nova Scotia. We need to put a stop to this industry before they are in several shallow harbours in Nova Scotia.

This province is one of the last places that has "clean" water. Please do not allow our water to be poisoned with fish farm waste and chemicals. If fish farms are being closed down on the West coast of Canada they should be closed down here as well. We do not want to be treated like the "poor cousin" that has to accept pollution just to benefit Multi National Corporations that take most of their money elsewhere.

Thank you for considering my objections to this Cooke Aquaculture expansion in my community.

I am opposed to Open Fish Farming. I would however be open to land based Fish farming.

Yours truly,



Ron Campbell

Harbour Authority of Moose Harbour

Liverpool, NS

February 9, 2024

RECEIVED
FEB 12 2024
NS Aquaculture
Review Board

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

Re: The application by KELLY COVE SALMON 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 Chair and Board:

We are writing to make our concerns about this fish farm expansion known. We are a Non-Profit Corporation leasing the Moose Harbour facilities from the Federal Government through Small Craft Harbours. Our volunteer Board of Directors have been operating this Harbour for 27 years. We are currently at full capacity with 9 vessels paying wharfage each year.

The Mersey Point site AQ#1433 is very close to the entrance to our harbour. Attached is the drawing from KCS application documents, showing Moose Harbour and the proposed site AQ#1433.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

All of our Directors fish for lobster from the last Monday in November to May 31 each season. During the fishing season, there is often lobster being stored in the harbour. The crates of lobsters are floating on the surface and are vulnerable if any chemicals or pollutants are released in the water. If the expansion is approved, we would ask that no treatments with any Pesticides, Hydrogen Peroxide, cleaners or other chemicals be allowed during the months that live lobster is being stored (last Monday of November to mid June). The currents would bring those chemicals into our harbour twice daily on the tide and they could damage or kill the fishermen's live lobster. As reported in the DFO consultation report there are three Lobster Storage places in Liverpool Bay.

Section 3 - Factor 6) The Public Right of Navigation: Moose Harbour can be a challenging harbour to get in and out of when the weather is stormy. The entrance is narrow and there are large rocks just outside of the harbour/breakwater that the boats need to maneuver around. When there are large waves, the boats sometimes have to swing around to make second attempts or abandon and go to the Liverpool Wharf. The Mersey Point AQ#1433 cage site could pose a hazard to vessels in

bad weather. The boats leave the harbour in the dark and come back in the dark. The site will also be blocking navigation along the shore for vessels fishing or going to and from the Liverpool and Brooklyn wharves. Sometimes, if the channel is rough, they need to have the option of hugging the shoreline.

Maintenance: Moose Harbour needs to be dredged often because it is very shallow, with bedrock and hard pan on the bottom. We have a difficult time getting the Harbour dredged enough due to lack of funds from Small Craft Harbours. We are concerned that the extra fish feed, fish waste and other debris from the Mersey Point site AQ#1433 will enter our harbour on the currents and settle to the bottom. This will increase the amount of material that needs to be dredged and will add to our problems. If the dredge material tests too high for chemicals, the cost of disposal goes up dramatically. Again, this will make it harder to get the harbour dredged.

Section 3 – Factor 1: The optimum use of marine resources:

Liverpool Bay is already being used in many ways by many people, both commercially and for recreation. Liverpool Bay is already being used optimally, sustainably by many people in many ways. If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically decreased. If the channel is narrowed with industrial sized fish leases this lessens the activities that can continue.

It is also our belief that the **federal Department of Fisheries and Oceans** should be protecting our fish and fish habitat, as mandated, and not allow the Province of Nova Scotia to promote open pen fin fish farms in our waters.

Yours truly,



Barry Cameron,
Director

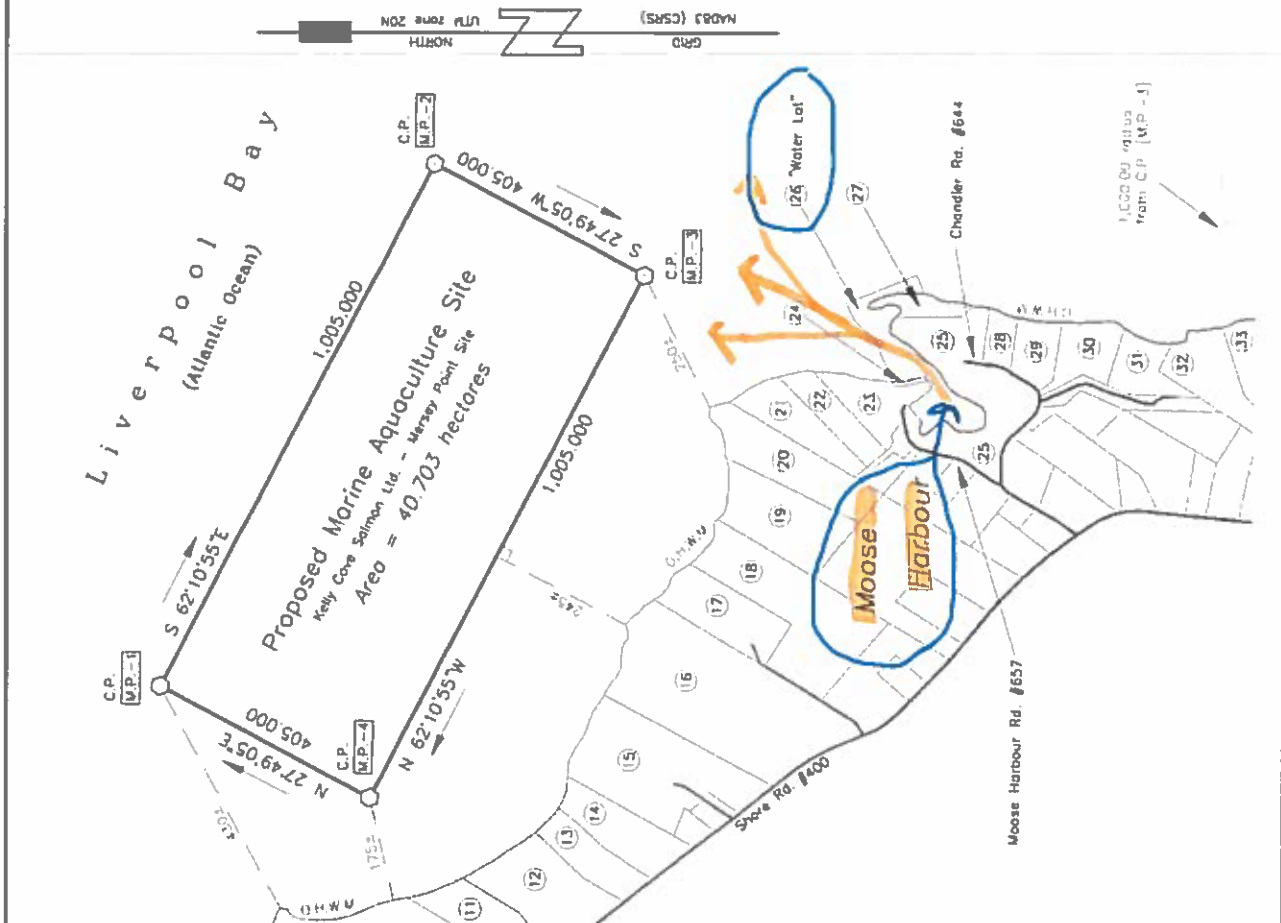
Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier

1) attach

| # | P.L.D. # | OWNER / ADDRESS |
|----|----------|---|
| 1 | 70042551 | Grady Lorne Martin 2 Grenier St. Lower Sackville, N.S. |
| 2 | 70042577 | Gordon Leys Box 90, Liverpool, N.S. |
| 3 | 70042519 | John P. Sullivan et al P.O. Box 1152, Liverpool, N.S. |
| 4 | 70216875 | Ann Leys Leys Box 100, Box 151, Liverpool, N.S. |
| 5 | 70228386 | John Leys Leys et al Box 90, Liverpool, N.S. |
| 6 | 70042654 | John Leys Leys Box 151, Liverpool, N.S. |
| 7 | 70042697 | Leys Leys P.O. Box 151, Liverpool, N.S. |
| 8 | 70230677 | John Leys Leys et al P.O. Box 151, Liverpool, N.S. |
| 9 | 70229115 | Thomas H. Kurlall et al Box 910, Liverpool, N.S. |
| 10 | 70042783 | Michael Kenneth Leys et al Box 910, Liverpool, N.S. |
| 11 | 70245204 | Leys Leys Professional Corp Box 910, Liverpool, N.S. |
| 12 | 70245272 | 130 Atlantic Plaza, Black Point N.S. P.O. Box 140 |
| 13 | 70245220 | Leys Leys Professional Corp Box 910, Liverpool, N.S. |
| 14 | 70042890 | Robert V. Saraghi et al Box 910, Liverpool, N.S. |
| 15 | 70043014 | Box 910, Liverpool, N.S. |
| 16 | 70163577 | Box 910, Liverpool, N.S. |
| 17 | 70236724 | Box 910, Liverpool, N.S. |
| 18 | 70043054 | Box 910, Liverpool, N.S. |
| 19 | 70043286 | Box 910, Liverpool, N.S. |
| 20 | 70043294 | Box 910, Liverpool, N.S. |
| 21 | 70043643 | Box 910, Liverpool, N.S. |
| 22 | 70043625 | Box 910, Liverpool, N.S. |
| 23 | 70043617 | Box 910, Liverpool, N.S. |
| 24 | 70247360 | Box 910, Liverpool, N.S. |
| 25 | 70043642 | Box 910, Liverpool, N.S. |
| 26 | 70247377 | Box 910, Liverpool, N.S. |
| 27 | 70043680 | Box 910, Liverpool, N.S. |
| 28 | 70243666 | Box 910, Liverpool, N.S. |
| 29 | 70043609 | Box 910, Liverpool, N.S. |
| 30 | 70043641 | Box 910, Liverpool, N.S. |
| 31 | 70189972 | Box 910, Liverpool, N.S. |
| 32 | 70043914 | Box 910, Liverpool, N.S. |

| Point | Latitude (N) | Longitude (W) |
|---------|----------------|----------------|
| M.P. -1 | 44°01'39.2188" | 64°40'15.6352" |
| M.P. -2 | 44°01'34.6067" | 64°40'35.8299" |
| M.P. -3 | 44°01'22.8782" | 64°40'43.5682" |
| M.P. -4 | 44°01'37.4905" | 64°40'23.8459" |

| Point | Latitude (N) | Longitude (W) |
|---------|----------------|----------------|
| M.P. -1 | 44°01'39.2188" | 64°40'15.6352" |
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| M.P. -3 | 44°01'22.8782" | 64°40'43.5682" |
| M.P. -4 | 44°01'37.4905" | 64°40'23.8459" |



PURPOSE OF PLAN (SHEET 1 OF 6)

NOTES:

Judy Westhaver

[REDACTED]

[REDACTED]

Liverpool, NS

[REDACTED]

RECEIVED

FEB 12 2024

NS Aquaculture
Review Board

February 6, 2024

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

Re: The application by KELLY COVE SALMON 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 Chair and Board:

I am writing to make my concerns about this fish farm expansion known. My family and I have lived in Queen County our whole lives. Some of my family members have been fishermen for many years.

The proposed Mersey Point site AQ#1433 is very close to my home.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

Many members of my family fish for lobster in Liverpool Bay and surrounding areas. They also fish for herring, mackerel and groundfish. Their livelihoods are entirely dependent on a healthy ecosystem and sustainable fisheries. The two new sites at Mersey Point and Brooklyn and expanded Coffin Island site will hinder their ability to fish the harbour safely and will damage the habitat for many species of creatures.

Section 3 – Factor 1): The optimum use of marine resources:

I don't think that a huge 60 pen fish farms is the best use of our marine spaces. Liverpool Bay is already being used optimally, sustainably by many people in many ways. Please do not

allow Cooke's to displace our fishers (Commercial and Aboriginal), our plant harvesters, our recreational boaters, our divers, our surfers, our kayakers. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. These sites are planned for very shallow waters that will not flush well. We do not have the strong tides that the Bay of Fundy has.

If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically decreased. Our community will pay the highest price if this experiment fails. Why ruin our marine habitat for a business that will pollute the bay and then walk away without cleaning up their mess. I want to see our local businesses continue to thrive and our community healthy for the sake of my children and grandchildren.

There has been only one public meeting, five years ago, to voice our concerns. The community should have a say in whether or not our waterways are damaged by companies from other provinces, other countries. As these companies are kicked out of other countries it will put more pressure on Nova Scotia. We have to put a stop to this industry before they are polluting several shallow harbours in Nova Scotia.

This province is one of the last places that has "clean" water. Please do not allow our water to be poisoned with fish farm waste and chemicals. If fish farms are being closed down on the West coast of Canada they should be closed down here as well. We do not want to be treated like the "poor cousin" that has to accept pollution just to benefit Multi National Corporations that take most of their money elsewhere.

Thank you for considering my objections to this Cooke Aquaculture expansion in my community.

Yours truly,

A black rectangular box redacting the signature of Judy Westhaver.

Judy Westhaver

Cc Prime Minister, Hon. Justin Trudeau
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc MP, Hon. Rick Perkins
Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc Minister of Environment, Hon. Tim Halman
Cc MLA, Hon. Kim Masland
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds

RECEIVED

FEB 12 2024

NS Aquaculture
Review Board

Duane Stevens
[REDACTED]
[REDACTED]
Port Medway, NS
[REDACTED]

February 9, 2024

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

Re: The application by KELLY COVE SALMON 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 Board Members and Chair:

I am writing to make my concerns about this fish farm expansion known. My family and I have lived in Queen County our whole lives.

Section 3 - Factor 6) The public right of navigation

I have been fishing for lobster from my home port of Port Medway for many years. As shown on the attached map I navigate along the shore from my home port to the Brooklyn Marina or Brooklyn Wharf. Depending on the weather, I need flexibility to choose the safest route along the shoreline. The current site AQ#1205x and the proposed site AQ#1432 pose an obstacle for my navigation in Liverpool Bay.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

I usually set some of my lobster traps outside of Coffin Island, so at times I need to travel through that area to get to my traps or to the Brooklyn Marina or Brooklyn Wharf.

The Coffin Island site AQ#1205x is close to my home port and fishing grounds.

Many families in our home town rely on income from lobster fishing in Liverpool Bay and surrounding areas. They also fish for herring, mackerel, groundfish and some harvest Irish Moss. Our livelihoods rely heavily on a healthy ecosystem and sustainable fisheries.

Industrial scale Fin Fish farms will damage the habitat for many species of creatures. These sites are right over top of very productive lobster habitat. Every Spring we see the large female lobster arrive to deposit their eggs in the shallow waters along this shoreline.

I would be very disappointed in any government body that allows this harbour to be damaged by fin fish waste, pesticides and chemicals in the feed.

When KCS has to use pesticides on the sea lice this could harm the lobster larvae that float on the surface in July and August every year. The increase in sea lice is inevitable when you dramatically increase the number of salmon in the area.

Section 3 – Factor 1): The optimum use of marine resources:

Industrial scale fish farms are not the best use of our marine spaces. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. We do not have the strong tides that the Bay of Fundy has. These sites are planned for very shallow waters that will not flush well. If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically affected.

Liverpool Bay is already being used optimally by many people in many ways. Please do not allow Cooke's (KCS) to displace our commercial fishers, our First Nations fishers, our plant harvesters, our recreational boaters, our recreational divers, our sailors, and our beach goers.

Our community will pay **the highest price if this experiment fails**. Why ruin our marine habitat for a business that offers very little to Queens County. A huge fish farm will bring pollution to our beautiful bay and change our lives. I want to see our local

businesses continue to thrive and our community healthy for the sake of my children and grandchildren.

Social License:

The community should have a say in whether or not our waterways are damaged by companies from other provinces, other countries. As these companies are kicked out of other countries, it will put more pressure on Nova Scotia to accept them.

There has been only one public meeting, five years ago, where we could voice our concerns. KCS has not engaged with the Fishing community since that public meeting.

This province is one of the last places that has "clean" water. New Brunswick and Newfoundland are already full of disease and sea lice. Please do not allow our waterways to be poisoned with fish farm waste and chemicals.

If fish farms are being closed down on the West coast of Canada they should be closed down here as well. We do not want to accept pollution just to benefit Multi National Corporations that take most of their money elsewhere.

Thank you for taking the time to read my objections to this Cooke Aquaculture (Kelly Cove Salmon) expansion in my community.

Yours truly,

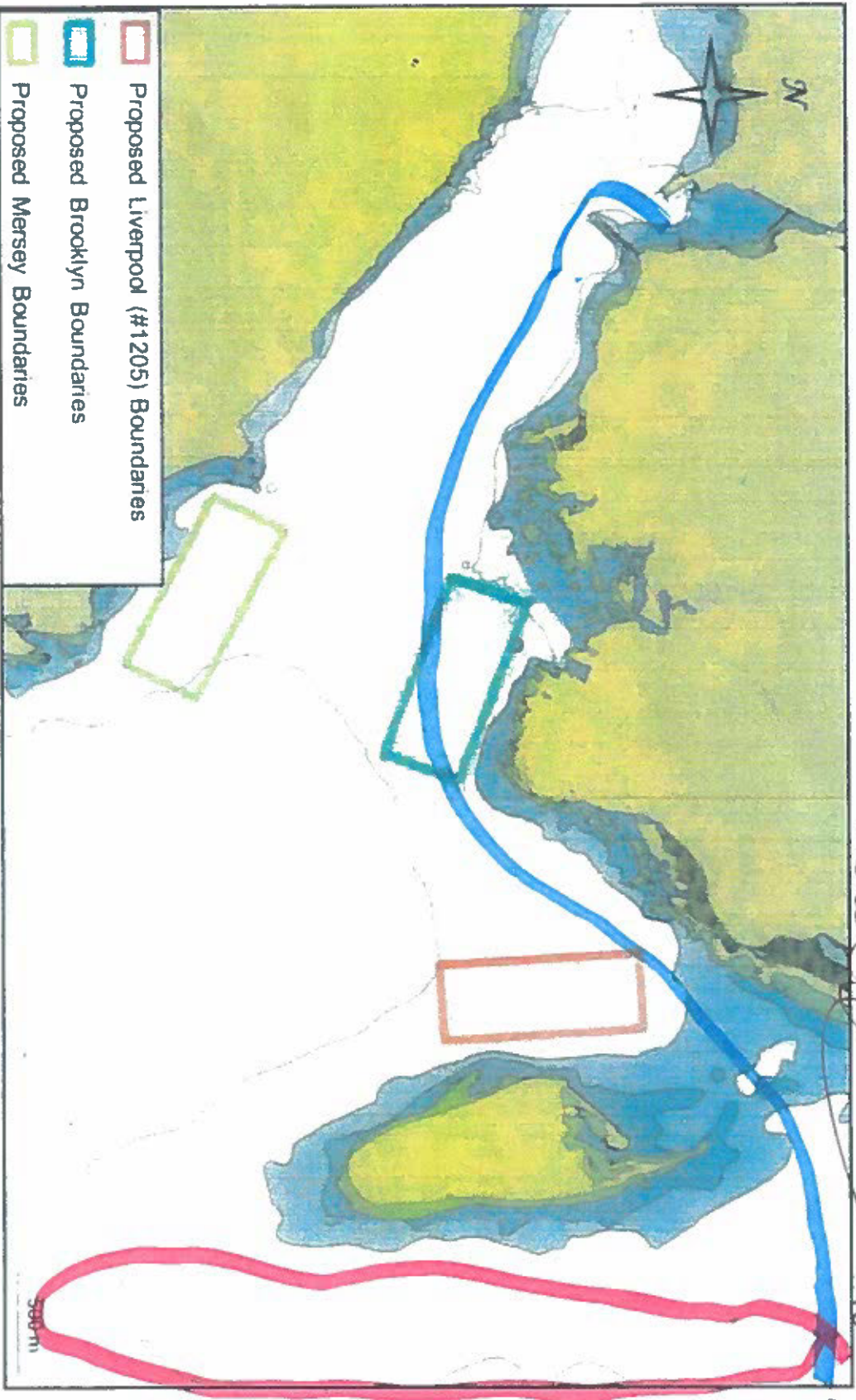


Duane Stevens

Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc Minister of Environment, Hon. Tim Halman
Cc Prime Minister, Hon. Justin Trudeau
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds



Figure 1. Proposed Lease Boundaries in Liverpool Bay



SW2018-143

Duane Stevens
Dec 16/23

1- lobster
2- New to
9 spring - to 11
marina

Scott Gordon

Port Medway, NS

RECEIVED

FEB 12 2024

NS Aquaculture
Review Board

February 8, 2024

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

Re: The application by KELLY COVE SALMON 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 Board:

I am writing to make my concerns about this fish farm expansion known.

I have been fishing in Queens County for eight years from my home port of Port Medway.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

I usually set some of my lobster traps outside of Coffin Island, so at times I need to travel through that area to get to my traps. The Coffin Island site AQ#1205x is close to my home port and fishing grounds.

Industrial scale Fin Fish farms will damage the habitat for many species of creatures. Many people fish for herring, mackerel, groundfish and some harvest Irish Moss. Our

livelihoods rely heavily on a healthy ecosystem and sustainable fisheries. These sites are right over top of very productive lobster habitat. Every Spring we see the large female lobster arrive to deposit their eggs in the shallow waters along this shoreline.

I would be very disappointed in any level of government that allows this harbour to be damaged by fin fish waste, pesticides and chemicals from the fish feed.

When KCS has to use pesticides on the sea lice this could harm the lobster larvae that float on the surface in July and August every year. The increase in sea lice is inevitable when you dramatically increase the number of salmon in the area.

Section 3 - Factor 6) The public right of navigation

I have been fishing for lobster from my home port of Port Medway for eight years. As shown on the attached map I fish outside of Coffin Island and within Liverpool Bay off Moose Harbour and Western Head. Depending on the weather, I need flexibility to choose the safest route to and from my fishing grounds. All three sites could pose a hazard during stormy weather depending on where I set traps and where I need to steam to check them.

Section 3 – Factor 1): The optimum use of marine resources:

Industrial scale fish farms are not the best use of our marine areas. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. We do not have the strong tides that the Bay of Fundy has. These sites are planned for very shallow waters that will not flush well. If the habitat is damaged, the livelihoods of hundreds of fishing families could be dramatically affected.

Liverpool Bay is already being used optimally by many people, in many ways. Please do not allow Cooke's (KCS) to displace our commercial fishers, our First Nations fishers, our plant harvesters, our recreational boaters, our recreational divers, our sailors, and our beach goers.

Social License, public input

There has been only one public meeting, five years ago, where we could voice our concerns. KCS has not engaged with the Fishing community since that public meeting.

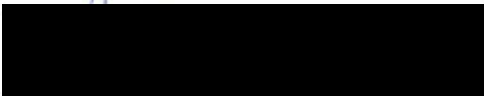
The community should have a say in whether or not our waterways are damaged by companies from other provinces, other countries. As these companies are kicked out of other countries, it will put more pressure on Nova Scotia to accept them. British Columbia, New Brunswick and Newfoundland are already full of disease and sea lice.

This province is one of the last places that has “clean” water. Please do not allow our waterways to be poisoned with fish farm waste and chemicals.

Our community will pay the **highest price if this DFA experiment fails**. Why ruin our marine habitat for a business that offers so little to Queens County.

Thank you for taking the time to read my letter, written in defense of my fishing industry.

Yours truly,

A black rectangular box redacting the signature of Scott Gordon.

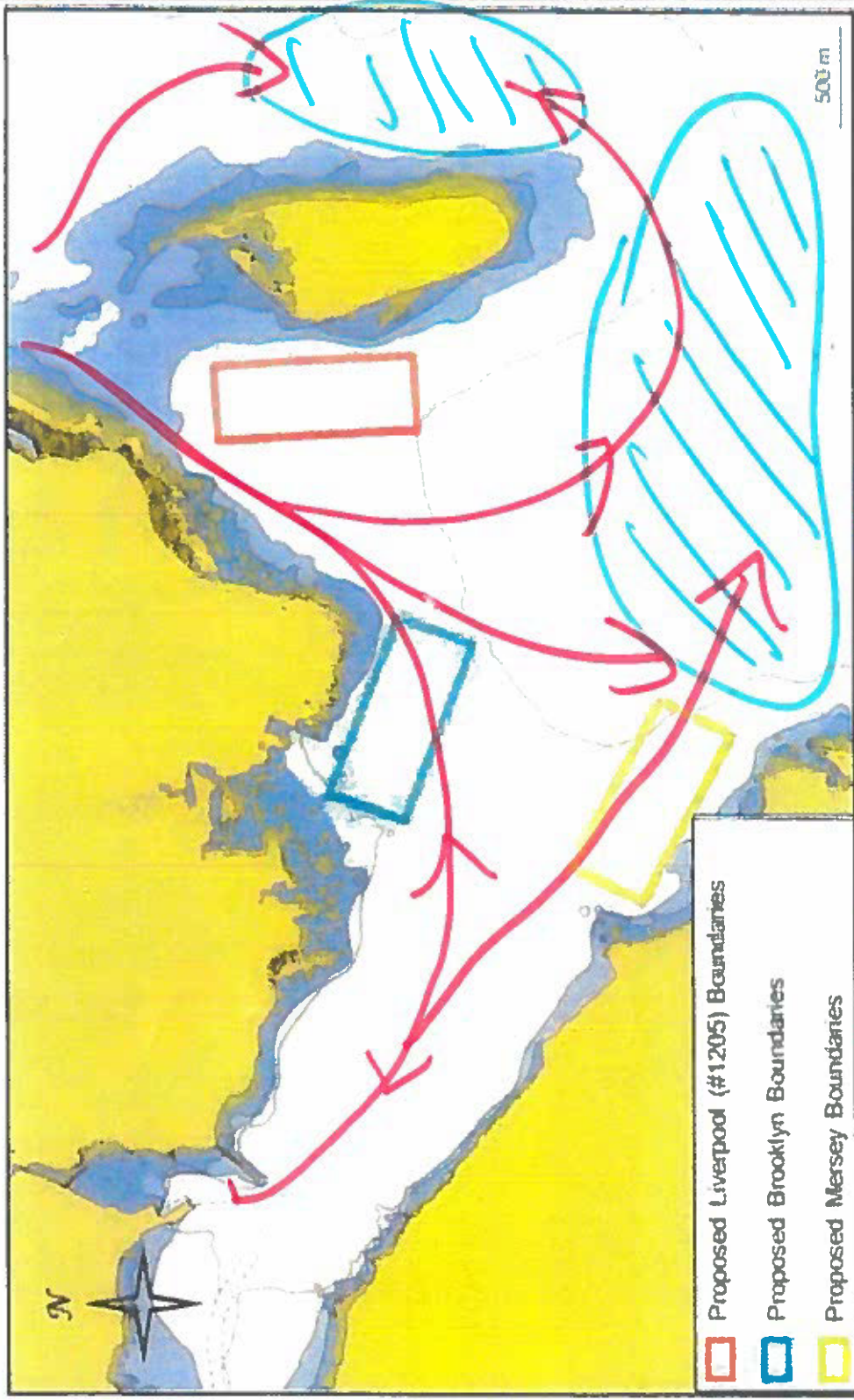
Scott Gordon

Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc Minister of Environment, Hon. Tim Halman
Cc Prime Minister, Hon. Justin Trudeau
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds

Attachment (1)



Figure 1. Proposed Lease Boundaries in Liverpool Bay



- Lobster fishing - Fall
- Navigation Routes

Warren Getson
[REDACTED]
[REDACTED]
Alberton, PE
[REDACTED]

RECEIVED
FEB 12 2024
NS Aquaculture
Review Board

February 7, 2024

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

Re: The application by KELLY COVE SALMON 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 Board Chair:

I am writing to make my concerns about this fish farm expansion known.

I have been fishing in Queens County for twelve years from my home port of Moose Harbour and I also use the Mersey Port Wharf.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

I usually set some of my lobster traps inside of Coffin Island, and along the both shorelines of Liverpool Bay. I need to travel through the entire area to get to my traps. The Brooklyn site AQ#1205x is

where I set some traps so an expansion here will mean I am displaced. The two new sites AQ#1432 and AQ#1433 are also precisely where I set traps, especially in the Spring. These two sites are huge and will take away significant fishing grounds from me and others.

Our livelihoods rely heavily on a healthy ecosystem and sustainable fisheries. These sites are right over top of very productive lobster habitat. Every Spring we see the large female lobster arrive to deposit their eggs in the shallow waters along this shoreline. Industrial scale Fin Fish farms will damage this nursery habitat of many creatures (herring, mackerel, crabs, lobster, marine mammals and sea birds).

The pesticides used to kill sea lice will harm the lobster larvae that float on the surface in July and August every year. Sea lice may not be a big problem yet, but the increase in sea lice is inevitable when you dramatically increase the number of salmon pens in the area.

Section 3 – Factor 6) The public right of navigation

I have been fishing for lobster from my home port of Moose Harbour for twelve years. As shown on the attached map I fish outside of Coffin Island and within Liverpool Bay. I need flexibility to choose the safest route to and from my fishing grounds. All three sites could pose a hazard during stormy weather depending on where I set traps and where I need to steam to get back to port safely.

Section 3 – Factor 1): The optimum use of marine resources:

Industrial scale fish farms are not the best use of our marine areas. Wherever these large-scale fish farms operate they saturate the environment with pollution and sea lice. We do not have the strong tides that the Bay of Fundy has. These sites are planned for very shallow waters that will not flush well.

Liverpool Bay is already being well used by many people, in many ways. Please do not allow Cooke's (KCS) to displace our commercial fishermen, our plant harvesters, and our recreational boaters.

Social License, public input:

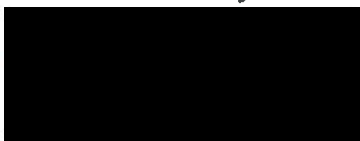
KCS has not engaged with the Fishing community since the single public meeting five years ago. The lobster industry should have some say in whether our fishing grounds are given away to a company that will pollute the entire Bay.

Queens County will pay the highest price if this DFA experiment fails. Why ruin our marine habitat for a business that offers so little in return. DFA could put their efforts towards land-based fish farms instead of promoting an industry that will cause destruction of other sustainable fisheries.

I would be very disappointed in any level of government that allows this harbour to be damaged by any fin fish companies, not just KCS.

Thank you for taking the time to read my letter, written in defense of our fishing industry and the natural habitat in our Liverpool Bay and surrounding waters.

Yours truly,

A black rectangular box redacting the signature of Warren Getson.

Warren Getson

Cc Premier, Hon. Tim Houston

Cc Minister of DFA, Hon. Kent Smith

Cc MLA, Hon. Kim Masland

Cc MP, Hon. Rick Perkins

Cc Minister of DFO, Hon. Diane LeBouthillier

Cc Minister of Environment, Hon. Tim Halman
Cc Prime Minister, Hon. Justin Trudeau
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds

Attachment (1)

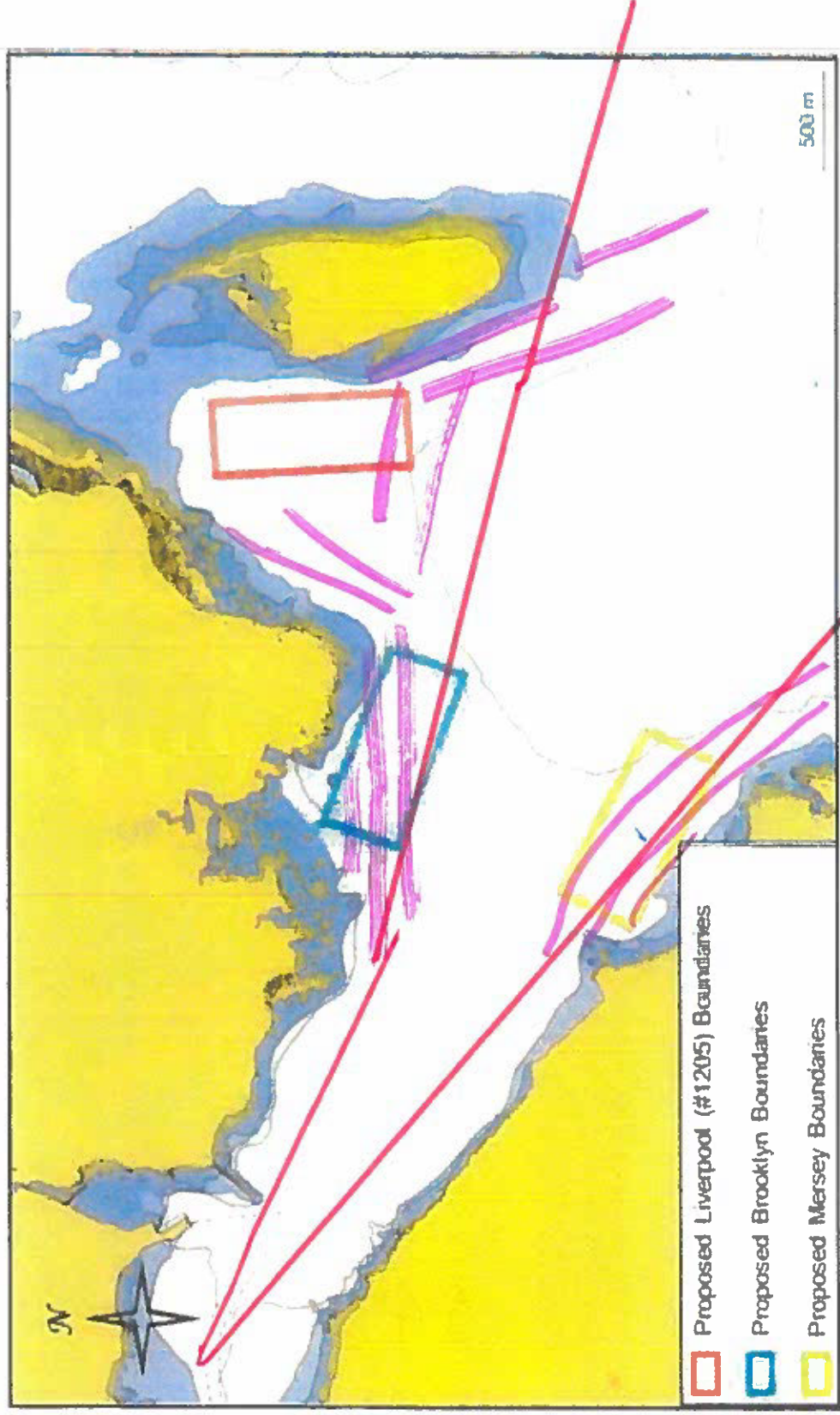
WARREN GETSON



75
March 2019

Nov 24, 2023

Figure 1. Proposed Lease Boundaries in Liverpool Bay



SW2018-143

9

Lobster Traps
Navigation

Mr. Philip C. Irwin

██████████
██████████
Brooklyn, NS
██████████

RECEIVED
FEB 12 2024
**NS Aquaculture
Review Board**

February 6, 2024

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

Re: The application by KELLY COVE SALMON 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 Chair Person and Board Members:

I am writing today because I am very concerned about the potential fish farm expansion. My wife and I have lived in Brooklyn, Queens County for many years.

Section 3 - Factor 3) Fisheries activities in the public waters surrounding the proposed aquaculture operation.

In the KCS application package where DFO lists the “Fisheries in Liverpool Bay and the Committees to Engage”, **DFO has neglected to mention the three licenses that I have held for many years.**

I have a Herring Trap Net license #140165 for the Western Side of Liverpool Harbour.

I have a Mackerel Trap License #140604 for Eastern Head, Liverpool Bay.

And, I have a Mackerel Trap License #140603 for Black Point, West Side of Liverpool Hbr.

The two new cage sites will interfere with the placement of my herring traps and mackerel traps. It is not possible for me move these traps to other locations. I do not feel it is right that I can be displaced from a trap area that I have held for close to 60 years. I am 81 years old, and I may choose to retire soon. These licenses will have zero value if the new cage sites are approved. This unfair displacement should be considered along with the issue of my lobster fishing.

I set my lobster traps throughout the entire Liverpool Bay depending on the weather and the season.

The Coffin Island site AQ#1205x and the two new sites, Brooklyn AQ#1432 and Mersey Point AQ#1433, are where I set lobster gear every season.

A huge fish farm will bring pollution to our once healthy bay and create **marine dead zones**.

If this farm had remained small like it was in the beginning I would not be opposed. But, if this farm is allowed to become an industrial sized operation, it is inevitable that the Bay will become overloaded with fish waste, chemical waste and sea lice. The water is just too shallow to handle 60 pens full of salmon.

Section 3 - Factor 6) The public right of navigation

I have been fishing for lobster from my home port of Brooklyn for many years (60). As shown on the attached map, I navigate along the shore from my home port in Brooklyn to the fishing grounds. Depending on the weather, I need flexibility to choose the safest route along the shoreline and to cross the harbour. The current site AQ#1205x and the proposed sites AQ#1432 and AQ#1433 pose a hazard for my navigation in Liverpool Bay. When the weather is stormy Captains need flexibility to choose the safest route home. Hundreds of fishing families rely on this Bay to provide a livelihood.

Section 3 – Factor 1): The optimum use of marine resources:

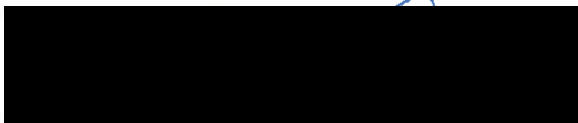
Industrial scale fish farms are not the best use of our marine spaces.

Liverpool Bay is already being used optimally by many people, in many ways. Please do not allow KCS to displace our commercial fishers, our First Nations fishers, our Irish Moss harvesters, and all the recreational users.

If this DFA experiment fails, it is our community that will pay too high of a price. We will bear all the expense and Cooke's will walk away with the profits, never cleaning up their mess.

Thank you for taking the time to read about my concerns.

Yours truly,



Philip C. Irwin,
Lobster Fisherman

Cc Premier, Hon. Tim Houston
Cc Minister of DFA, Hon. Kent Smith
Cc MLA, Hon. Kim Masland
Cc Minister of Environment, Hon. Tim Halman
Cc MLA, Gary Burrill
Cc MLA, Hon. Zach Churchill
Cc MLA, Hon. Anthony Edmonds
Cc MP, Hon. Rick Perkins
Cc Minister of DFO, Hon. Diane LeBouthillier
Cc Prime Minister, Hon. Justin Trudeau

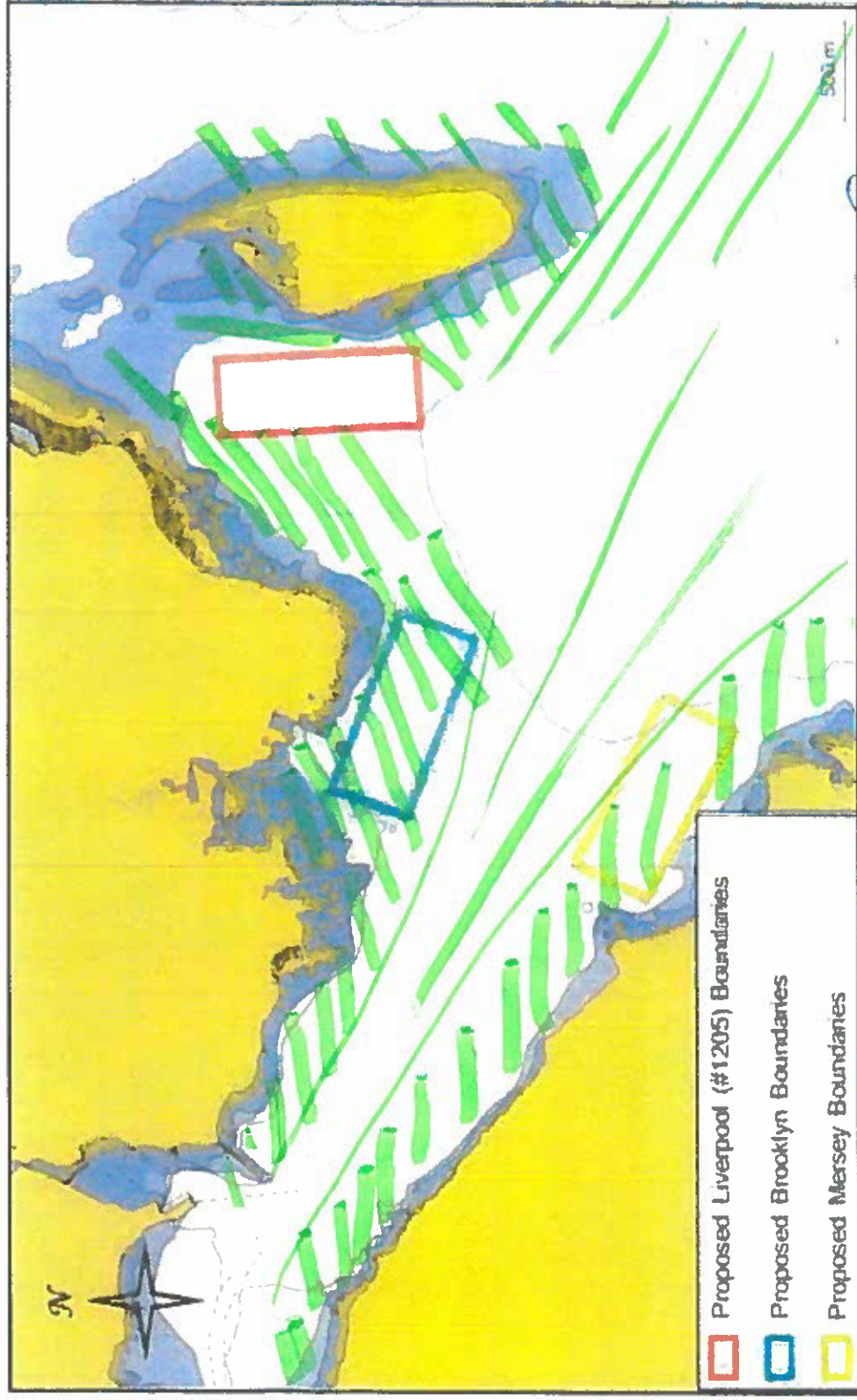
Attachment (3)

| Location | Fishery | Fishery Timing | Committees to Engage |
|--|----------------------|---|---|
| Liverpool Bay Application # 1432 & 1433 | <u>Lobster</u> | Commercial: last Monday in November to May 31 each year FSC: Starting around June 1 each year and usually ending in late October | Lobster Fishing Area 33 Advisory Committee who meet bi-annually with main meetings in June and October. First Nations: FSC Fishery - Acadia First Nation and Native Council of Nova Scotia |
| | <u>Groundfish</u> | Recreational: June to October each year Commercial: possible halibut (longline) could occur in area (NAFO 4X). | Queens County Fish & Game Association Groundfish Advisory Committee for NAFO 4X |
| | <u>Gaspereau</u> | Commercial: March 15 to May 31 each year | Gaspereau Lunenburg/Queens Advisory Committee |
| | Scallop | Recreational (no known activity) FSC - Year round (no known activity in this area) | N/A First Nations: FSC Fishery |
| | <u>Mackerel</u> | Commercial: June until November each year Recreational: June to November each year | SWNS Inshore Herring Management Board |
| | <u>Herring</u> | Commercial: September to November each year. | |
| | Shellfish | Area surrounding proposed sites is currently classified as prohibited for harvesting due to unsanitary water conditions. This closure is currently permanent in nature. | South West Nova Scotia Clam Advisory Committee |
| | <u>Marine Plants</u> | Commercial open year round (Leases) | Scotia Garden Seafood Inc. |
| | <u>Oyster</u> | Recreational: May 1 to October 31 | N/A |
| | <u>Elver</u> | No recreational fishery FSC: Occurs early spring (March until July normally) | N/A First Nations : FSC Fishery |

Consultation



Figure 1. Proposed Lease Boundaries in Liverpool Bay



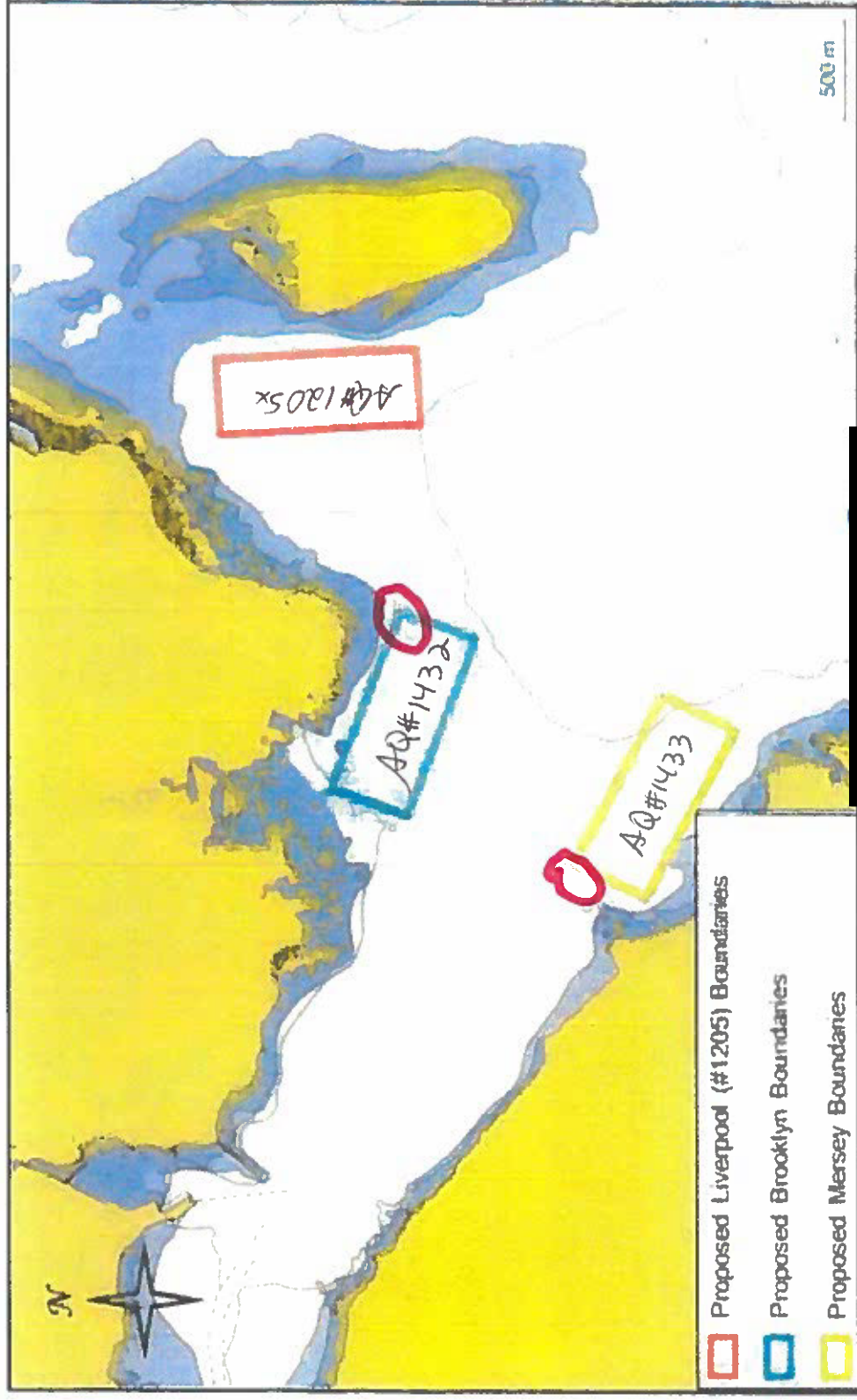
Lobster Trap Sets

SW2018-143

February 24



Figure 1. Proposed Lease Boundaries in Liverpool Bay



Fish Trops

SW2018-143

February 6/24

From: [Karen Goulden](#)
To: [Aquaculture Review Board](#)
Subject: 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.
Date: February 12, 2024 3:02:53 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Exercise caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

February 12, 2024

[REDACTED]
Beach Meadows, Nova Scotia
[REDACTED]
[REDACTED]

Attention: Nova Scotia Aquaculture Review Board

I am writing to strongly oppose the application noted above.

My opposition is in reference to the factors in Section 3

- a) the optimum use of marine resources
- d) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation
- e) the other users of the public waters surrounding the proposed aquaculture operation

Our home and property at [REDACTED], Beach Meadows, NS is a short barefoot walk on our boardwalk to the Municipal beach known as Beach Meadows Beach. The existing Kelly Cove Salmon site AQ#1205x is located about 1 km from our house and is visible from our south facing windows and decks.

Our children, grandchildren, friends and relatives visit us in all seasons to enjoy the public sand beach and shoreline.

I am very concerned about the close proximity of the finfish feedlot to the public beach and our shoreline. Salmon feces, salmon feed, cleaning chemicals, pesticides, medications, disease and lice infestations are not contained within the finfish pens.

I have witnessed wave action with noticeable sea foam travelling directly to the public beach and shoreline from the finfish pens.

I have seen hundreds and hundreds of styrofoam beads from Kelly Cove Salmon's broken buoys as well as black pvc style pipes and tubes, and various pieces of rope washed up on the beach.

The waste from the finfish feedlots is not contained and whether some of it collects on the sea floor or it flushes out to sea or migrates on currents onto the sand beach and rocky shoreline is dependent on the wind, weather and waves which are ever changing. It is never okay to pollute anywhere on land or in the water.

I have witnessed hundreds of seagulls hovering and landing on the finfish pens. Are they attracted to the

finfish pens as a source of food? What affect is the feces of hundreds of seagulls concentrated in one area at any one time having on the salmon living in the confined space of the pens and on the sand beach and shoreline?

I fear how this uncontained waste, especially the feces, chemicals, pesticides, medications, possible disease and lice, will affect anyone who swims or walks in the water and along the beach and shoreline. It would also affect the sea creatures and sea birds.

Kelly Cove Salmon's engineer states that the pens are capable of withstanding the force of any storms; however, we have already witnessed failures as a result of their poor design. With more and more severe weather events, I fear a disaster is imminent. A failure of the pens in severe weather would be devastating to the public beach. It would be devastating as well to the lives and well being of the salmon living in the current pens. It would have an impact on all sea life, including wild salmon, in the surrounding area.

The ARB does not recognize the impact of human or equipment failure that is a result of any large operation such as the finfish feedlot. Failures of farming on land have far less impact on the enviroment than failures of farming on the ocean.

Liverpool Bay and the surrounding shoreline is well utilized by boaters, fishers, tourists and residents alike. Please do not allow this expansion of AQ#1205, AQ#1432 and AQ#1433 to threaten Liverpool Bay and Beach Meadows Beach and the surrounding shoreline of the bay. This expansion would not be optimum use of Liverpool Bay, in fact, it is just the opposite.

I strongly oppose 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#1205, AQ#1432, AQ#1433 in Liverpool Bay, Queens County.

Thank you for your consideration.

Karen Goulden

February 8, 2024

Nova Scotia Aquaculture Review Board

I am Dr Garry Morash and along with my wife Suzan Morash reside at [REDACTED] in Beach Meadows, Queens County, Nova Scotia. I am writing this letter to express our opposition to 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 AQ#1205x, AQ1432, AQ1433 in Liverpool Bay, Queens County.

I was born in Beach Meadows in 1951 and grew up in this community enjoying the beautiful beaches and spending a lot of time fishing and partaking in the recreational activities the proximity to the ocean provided. I attended Acadia University and obtained my BSc degree and then attended Dalhousie University Medical School Graduating in 1977. I returned to Liverpool in the fall of 1978 and served this community as a Family Physician until my retirement from my office practice in 2018. I have continued to work at the Queens General Hospital as an emergency room physician since that time to help maintain the availability of outpatient care to my community.

In 1980 my wife and I built our home at [REDACTED] Beach Meadows. We built our home on the shore of Liverpool harbour to able to enjoy the beautiful ocean views and experience the constantly changing nature of the sea. We brought up our 5 sons on this property who had the privilege of having the ocean and shoreline at our home as their playground. Over the years we have purchased other parcels of land adjacent to our original property up and down the harbour shore front. In 2014 our oldest son acquired [REDACTED] from us and we moved into our present home at [REDACTED] because we wanted his young family to have the same experiences our sons had growing up with the ocean as a part of their life. Our present home is also an ocean front property that has a beautiful view of Liverpool harbour and is in Fralick Cove which we use for boating and fishing. No one has ever come to our home for the first time and not remarked about how beautiful our view is.

If you grant this application for the fish farm expansion instead of looking at our wonderful ocean view we will be looking at a diesel run feeding barge at site AQ1432 and past

that to the site AQ1433. We will be subject to the light and noise pollution this produces instead of the serene beauty we now enjoy. Our shoreline will be the dumping ground for all the debris produced by this farm and any wreckage caused by the storms and waves that batter our shore by the prevailing winds. The value of our property will decrease significantly as it will be much less desirable to any buyers without the unobstructed views we now enjoy. Our access to the harbour through Fralick Cove for boating will be disrupted by the buoys and lines of the pens making it more dangerous to find safe routes depending on ocean conditions. AQ1432 will sit just off the shoreline of most of our properties in this area thus detrimentally affecting us financially by devaluing these properties as well.

Along with the devastating affects this project will have on my family personally I am very afraid of the long term effects its approval will have on my community. The Brooklyn Marine is a shining example of what a volunteer group of community members can build and provides a huge asset to the attractiveness of living here. Its existence will be put in jeopardy if the ability to enjoyably boat in the harbour is ruined by the presence of two large fish farms. Their presence will also detrimentally disrupt sport fishing, lobster fishing and the First Nation's summer lobster fishery who all use the harbour now.

I have worked tirelessly with my medical colleagues over my 47 year career to recruit and retain medical professionals to our community and keep our local hospital viable and provide quality medical care to our rural area. If the beauty of our coastline, the community assets like the marina, and the recreational activities of our harbour are all negatively affected by your approval of this petition I see a very grim picture for my community's future. We will lose our ability to attract new health care providers who have lots of options to go to other more favorable areas. On a very personal note, my youngest son is a family physician who has been planning on returning to practice in Liverpool and was in the process of acquiring a piece of property from his brother on the harbour near us to build a house but is reconsidering the move now because of the potential locations of the fish farms. The inability to attract new doctors could very easily lead to the closure of our hospital and the loss of a significant number of jobs resulting in a decrease in our population that would affect our local business community and schools. There could be a very impactful economic loss to the area for a very insignificant if any economic gain gleaned by approving the petition. I understand that the office for running the existing fish farm is not even located in our community and

is in Bridgewater. I am not debating the pros and cons of fish farming as that is not my expertise but I do contend that this placement they have chosen, I am assuming for easy access and lower costs to maintain, will adversely affect our whole community. I think that our citizen's welfare should be considered more than this company's profit margin.

I believe that no one on your committee is from this area and I would hope that you will do your due diligence and personally come and see with your own eyes our beautiful community and coastline from the land and water to be able to appreciate what your decision could so adversely affect if you vote in favor of this petition. Thank you for your time to read and consider my concerns.

Dr. Garry Morash

NS Aquaculture Review Board 2023

Re: Application for Boundary Amendment for Marine Finfish Licence/Lease AQ#1205x and New Marine Finfish Licence/Lease AQ# 1432 and AQ# 1433. Kelly Cove Salmon Ltd., Liverpool Bay, Queens County, Nova Scotia

Wayne Chandler of [REDACTED], [REDACTED], Brooklyn, NS, [REDACTED]

It is my pleasure to write a letter of support for the Cooke Aquaculture Liverpool Expansion. Since 2001 my wife and I have owned property on the shore of Liverpool Bay. Living on the shore we have the pleasure of watching activities on the bay first hand. Growing up and working on farms gave us a background in agriculture, livestock production, crop and food products. The following are some comments and observations:

Marine Traffic:

Even though we have no boat of our own, we have been on many sail and power boats in the bay.

- sailed from Lunenburg into the bay and to and from the bay to Carter's Beach, we are familiar with the entry to the bay.
- been around Coffin Island and docked there many times. A trip that can only be done under power not sail.
- We have watched the sail boat races as they tack back and forth on challenging courses. Which they haven't had any for several years, if they were to have them they could use the fish farm buoys as a marker in their race.
- Over the years we have met hundreds of visitor boat captains and crew that entered the bay and navigated to the Brooklyn Marina. The course of preference has always been one that stays inside the main channel. Very seldom do sail boats stray into shallower water outside this area. The usual procedure for visitor boats is to sail to the mouth of the bay and motor into the marina to dock.
- The entry at Herring Cove to the Brooklyn Marina has more navigational hazards than either the current has or the proposed farms will have.
- The channel often has lobster trap lines floating unmarked which get caught up in boat motors of local and visitor boaters. The boat owner has to hire a diver and pay for the repairs to the motor. These are real navigational hazards.

Changes at the Fish Farm

Over the years we witnessed the positive changes that have taken place at their present aquaculture site.

- Prior days they used a motorized feeder boat with 2 employees on it. They would go out and spread the feed manually into the pen as they circled the nets. This did create some loss of product over time with suffocation and flash freezing due to the fish swimming to

the top of the pen to fight over the food. The fish being so smart would also look for food if another motorized boat would approach the farm.

- Now they have a Feeder boat which is stationary. Thanks to modern technology they now have big tubes that feed the pens at various levels and intervals. Attached to these feeder tubes are cameras so that the remote operator can monitor the fish as they eat. When they stop eating the food is turned off. This new method avoids the problems of excess food floating to the bottom. The current feeder boat uses a diesel engine which has a minor sound when it runs. They have come up with an electric motor version which will be quieter for the fish and for the surrounding shore neighbors when they are installed. This shows again how Cooke Aquaculture continues to improve and be a good shore neighbor.
- Any time there is a problem we just call the company contact and they are very prompt with fixing the situation. For example, the light was left on at the feeder boat. There truly have not been many times where there have been any issues.

Shore Garbage:

- Cooke Aquaculture looks after and reports any debris that comes loose from their site. They are great stewards of the sea.
- Cooke Aquaculture has coordinated a shore clean up day in the past. The day of the shore clean up, Cooke's partnered with Clean Nova Scotia and were to serve snacks at the Brooklyn Marina following the clean up. The Save Liverpool Bay protesters were so rude and almost violent. They were squealing their tires through the Marina parking lot spraying gravel everywhere. One of the leaders was in our face verbally harassing us and the people that were volunteering to help with the cleanup. We had to tell one of them to stop accosting us in our personal email address and to leave us alone or we would call the police. We could not go with the others to the shore cleanup as we had to stay and protect the marina from the protestors. Cooke's moved the salmon barbecue and food tent to the Brooklyn Waterfront Park. Their behavior scares other supporters in the community from speaking up.
- On beach and shore walks we pretty much daily pick up lobster bands, gloves, broken traps, bait bags, lines and styrofoam markers. As a condition of the lobster license they are required to report any lost gear to DFO. Does this even happen? Have never seen the lobster people out cleaning up the shore.
- As bad if not worse than the lobster debris, is the people's garbage, plastic dog poop bags, plastic bottles, cans, string etc. All of which is known to be hazardous to marine life and sea birds.
- The effluent coming out of the river is proven scientifically to be worse than what comes from the fish farm.
- For years when the Bowater mill was in operation the chemicals coming from there kept the bay extraordinarily clean as witnessed by scientists that came and observed Herring Cove. Now that they are gone, there is lots of green algae on the lines at the marina.
- Fertilizers are also entering the bay as we see the algal blooms enter our yard from Brooklyn turning the water green and suffocating what is or was growing in the stream.

Lobster Fishing

- The lobster fishermen have been catching lots of lobster of good quality around the pens. There doesn't seem to be any problems.

Miscellaneous

- Farmed Salmon Escapes seldom happen. When it does, we see the locals come out in droves to collect the salmon and take them home to eat. There has been no fish escape since Cooke's have taken over the farm.
- When there was a truck accident shipping salmon enroute... locals come out to collect as many as they can to take home and eat. Maybe we need an emergency response ?? so that we can help Cooke's recover their fish faster.
- If we have no wild salmon, is there any danger of the farmed salmon entering the wild?
- Cooke's have been great shore neighbors, helping the operations at the marina over the years with the loan of their forklift to bring the docks in and out of the water.
- With Cooke's having boats on the water they are available for emergency should a boater have engine trouble.

Tourism

- From a tourism point of view it should be an attraction rather than a deterrent. We should be proud to be feeding the masses with such an environmentally sustainable healthy food resource. In an era where environmental sustainability and experiential travel are trending they have proven that there is a considerable amount of money to be made. This would be excellent for our Queens Coastal area to have another reason to come to Queens. We could be leaders and show people how to farm salmon sustainably.
- We have shark tours, we should have lobster tours, why not fish farm tours also.
- We here in Queens County are home to Aqualitus, a world leader in aquaponic marijuana agriculture. We should be proud to be partnering with Cooke's, a 35+ year old Canadian Company that has won Canada's best managed companies award for 15 years. A world leader in Sustainable Aquaculture, investing heavily in Atlantic salmon breeding programs, fish feed production, eco-friendly fish health treatment technologies, and innovative sea farming equipment. In addition, Cooke Aquaculture has attained the 4-Star BAP (Best Aquaculture Practices) Certification mark, which attests that their farmed salmon meets the BAP standards on four separate links in the chain of production: sea sites, processing plants, feed mills and freshwater hatcheries.

Salmon Stock Recovery

- The State of Washington is removing dams. Through this initiative it is expected to reopen more than 400 miles of habitat for steelhead and other threatened and iconic fish, and restore flows that can better flush away toxic algae and disease. Our government is looking to redo the dams. Maybe we should take another look at WHY.
- Cooke's continues to work with local fish and indigenous groups to replenish stock to local rivers and watersheds.

Summary

It's undoubtedly an exciting time for the industry as the future for salmon farming is in the open ocean," said Rosewarne. "We will need the continued support from all levels of government and the community to achieve this. We firmly believe that aquaculture could become New Zealand's most valuable industry and its greenest primary sector."

Over the years I have watched the fish farm develop and improve their practices. This fish farm is a prize winning operation. We should be privileged to have a great Canadian company here in our bay. Cooke's are very good about staying within the rules and regulations laid out by the Province of Nova Scotia and the Government of Canada. I believe that Cooke's has a vested interest in the sustainability of the farm sites. We do not know what the future of aquaculture has in store with climate change, warming water, given the past history of Cooke's company practices we believe that they will continue to evolve and be great stewards to the area while continuing to raise the salmon in a profitable manner. I look forward to watching the farms from our deck.