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By Nova Scotia Aquaculture Review Board at 8:47 am, Sep 23, 2024

**From:** [Dale Webb](#)  
**To:** [Aquaculture Review Board](#)  
**Subject:** Proposed Merigomish Lease  
**Date:** September 22, 2024 6:51:43 PM

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To whom it may concern,

I'm a commercial fisherman who fishes in the Merigomish area for oysters and quohogs.

There is a proposed lease for that area that would prohibit others from fishing there.

I, along with other fisherman in that area are against this lease being granted.

We feel that as it is, there are already too many leases in this area.

This will affect the livelihood of many as it would take away from our commercial fishing.

I look forward to hearing back from you on this matter

I can be reached either at this email address or you may call me at [REDACTED]

Sincerely,

Dale Webb

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OCT 17 2023

NS Aquaculture  
Review Board

[REDACTED]  
Fraser's Mountain, Nova Scotia  
[REDACTED]  
[REDACTED]

October 11, 2024

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

**RECEIVED**

By Nova Scotia Aquaculture Review Board at 1:18 pm, Oct 17, 2024

Dear Nova Scotia Aquaculture Review Board,

I am writing in response to the notice of a public hearing scheduled on November 25<sup>th</sup>, 2024 at the Pictou County Wellness Centre for AQ #1448 in Merigomish Harbour, Pictou County. I am expressing concerns about the option for a new marine aquaculture license and lease for suspended, bottom culture with gear, and bottom culture without gear of American Oyster (*Crassostrea virginica*), Bay Scallop (*Argopecten irradians*), Quahog (*Mercenaria mercenaria*), and Razor Clam (*Ensis directus*) made by C&G Aquaculture.

Personal connection to Merigomish harbour:

Being born and raised in the Merigomish area, I harvest commercial oysters and quahogs on an annual basis in the area being applied for in the lease option. There is also a public quahog bed in the centre of the bay (see diagram) that I have harvested every season for the last twelve years alongside numerous other commercial fishermen (e.g. [REDACTED] to name a few. As well as a public oyster bed located in the west end of the lease application (see diagram) that I have harvested every fall during the wild oyster fishery season, alongside others, including those listed above. Each of these public quahog and oyster beds have been and continue to be harvested in a sustainable and conservative manner. I have concerns that if this aquaculture license and lease is approved, it will eliminate these areas of harvesting from the public. Approval of this new aquaculture license and lease will eliminate income generated by multiple members of the community and replace it with one. If I am unable to continue to harvest in these areas, it will affect my family's income and livelihood as well other commercial fishermen in the area. It is important to keep in mind that in today's economy, with the increased cost of living and inflation, every dollar counts for every family.

Lack of consultation and collaboration of C&G Aquaculture with local commercial fishermen:

To my understanding, C&G Aquaculture has not contacted all commercial fishermen directly who harvest commercial oysters and quahogs in the area about the proposed lease option, rather only the lease holders in the harbour. In comparison to a recently approved application by the review board for Town Point Consulting Limited regarding oyster leases (1442, 1443, 1444) approved in Antigonish Harbour. Town Point Consulting Limited had reached out and consulted the wild oyster fishermen in the harbour and collaborated with them to avoid imposing on existing areas currently harvested.

Concerns about comments in C&G Aquaculture's application package:

After reviewing the C&G Aquaculture's application to the board, I have concerns about inaccurate information being stated on the subsequent pages in relation to the following factors set out in Section 3 of the Aquaculture License and Lease Regulations:

a. Optimum use of marine resources;

Page 13: *"This specific area is under utilized in that there is minimal recreational boater activity due to location and depths as well as very little commercial harvesting."*

This statement is inaccurate, as I personally have commercially harvested in this area for twelve years and continue to do so and am aware of at least six other fishermen who have and continue to do so as well. Therefore, if this lease is approved it will lead to local economic impact (i.e. negatively impact multiple household incomes and livelihoods). I have also witnessed numerous recreational boaters and kayakers in the area.

Page 23: *"A new aquaculture site near Pig Islands will not greatly impact the commercial fisheries in the harbour as it won't impede on the channel, the oyster fishery, and only includes a minimal number of quahogs. As the harbour has many shallow coves, quahogs are present in all of them with the majority of the quahogs being fished from a specific area with ideal conditions which will not be affected."*

As stated above, this area is currently harvested by commercial fisherman and what is considered a "minimal number of quahogs" to the applicant is not necessarily considered "minimal" to a commercial fisherman. I personally deem there is a large quality of quahogs in the area and request the Department of Fisheries and Aquaculture conduct a study on the area in the question. As this bay could be a nursery for the remainder of the quahogs in Merigomish Harbour, I would like to see a third-party study done on the number of quahogs and oysters present in the area being applied for.

b. The contribution of the proposed operation to community and Provincial economic development;

Page 22: *"The location experiences minimal commercial and recreational activity that is primarily picking quahogs. There should be no adverse economic impacts."*

I have personally harvested in this area for twelve years and generate income from it for my family. As stated above, I have also witnessed numerous recreational activities taking place, above and beyond "activity that is primarily picking quahogs". As a devoted father and husband, I strive to continue to harvest in the area being applied for to support my family in the years to come.

c. Fishery activities in the public water surrounding the proposed aquaculture operation;

Page 22: *"There are many boats involved in commercial fishing activities. They fish lobster, herring, ground fish, etc. The bulk majority of this commercial activity takes place outside of the harbour with four lobster trawls being placed in the harbour channel this year. There are also commercial fisheries for oysters and quahogs that take place within the harbour. While there are few oysters on the proposed site, there are a small number of quahogs there much like any cove in the harbour."*

Rather, there is a substantial public bed of oysters and quahogs in the area in question see attached diagram. This area could also impact lobster fishermen in future as it is a lobster fishing area in 26-A-2 and could be harvested in the future by commercial fishermen and/or indigenous fisheries. I personally have seen

numerous lobsters in the area, and it could easily become a future fishing area. I also have seen boats fishing rock crab in the proposed lease area and to my knowledge am unaware of any rock crab fishermen being contacted about the proposed lease.

e. The other users of the public waters surrounding the proposed aquaculture operation;

Page 27: *"This was also the mindset present when I was originally going to use the half of the cove that (blacked-out name) didn't want before he told me to apply for the whole cove."*

The blacked-out name in reference here is myself, Andrew Thompson. I however personally did not tell the applicant to apply for the whole cove and would like to see documented proof of this conversation. I did see on page 79, a Facebook messenger conversation between myself and the applicant but in no way does it state the above comment as I did not specify the location. This conversation was also intended to be a private conversation and not shared.

Finally, after reviewing the report on public engagement during scoping, clarification is needed on the following statement:

Page 78: *"This person hasn't picked a single quahog this year (following this meeting). I also explained out loud in the meeting how leases are required to have cautionary buoys marking the border which signifies to boaters that there are objects in the water."*

The commercial season is from June 1<sup>st</sup>- October 15<sup>th</sup> in the Gulf region. At the time of the public meeting on March 8<sup>th</sup>, 2021 it would not have been possible for a commercial quahog fisherman to harvest.

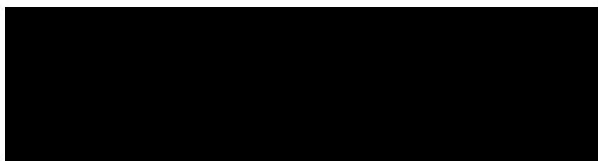
**Alternative option:**

An option available to minimize the impact to commercial and recreational fishermen is for C&G Aquaculture to amend their option and move further from the shoreline. This would allow the existing fishery to continue and C&G Aquaculture to still grow oysters in a suspended nature, as water depth would be needed to sink cages. If the lease was located in the centre of the harbour, too deep for commercial fishermen to harvest, it would show collaboration and would avoid C&G Aquaculture from imposing on existing areas currently harvested by the fishermen in the area. An example of a lease that has no effect on commercial harvesting in Merigomish Harbour, is [REDACTED]; lease [REDACTED]. The proposed area also has a high amount of eelgrass that will be at risk from the applicants proposed above surface culture and sinking cages. Moving further from shoreline would allow for conservation of an important element in the ecosystem in Merigomish Harbour.

In closing, I strongly oppose the option for a new aquaculture license and lease for suspended, bottom culture with gear, and bottom culture without gear of American Oysters (*Crassostrea Virginica*), Bay Scallop (*Argopecten irradians*), Quahog (*Mercenaria mercenaria*), and Razor Clams (*Ensis directus*) being made by C&G Aquaculture.

Thank you,

Andrew Thompson

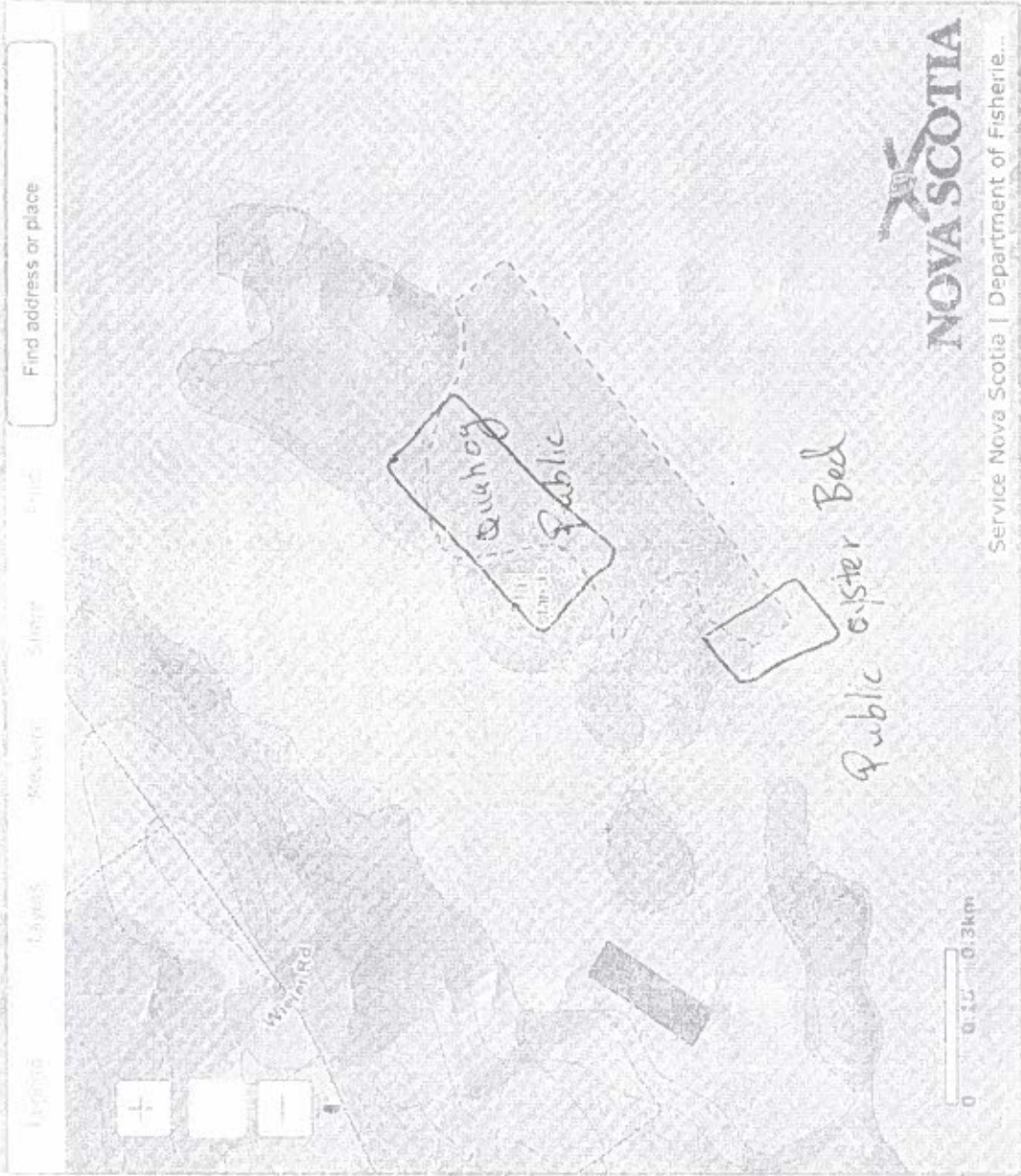


*Oct 11/2024*

AQ #1448

Site Mapping Tool - Government of Nova Scotia, Canada

# Nova Scotia Fisheries and Aqua...



[View Full Screen Map \(https://www.arcgis.com/apps/One\\_Zone/basicviewer/index.html?\)](https://www.arcgis.com/apps/One_Zone/basicviewer/index.html?)

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OCT 25 2024

NS Aquaculture  
Review Board

Clerk of the Nova Scotia Aquaculture Review Board  
60 Research Drive,  
Bible Hill, Nova Scotia  
B6L 2R2  
October 21, 2024

NSARB-2024-001-WRT-003

Dear Nova Scotia Aquaculture Review Board,

This letter is intended for the upcoming notice of public hearing for Aquaculture Option #1448 located in Merigomish Harbour, Nova Scotia. The application for a new Aquaculture License and Lease is being made by C & G Aquaculture.

We are writing regarding this: ***Section 3 (c) Fishery activities in the public water surrounding the proposed aquaculture operation.***

We are writing to ask the Board to modify the Lease Agreement to allow for continued recreational use of the Proposed Lease Area. Numerous members of my family enjoy picking Quahogs/Oysters in the proposed area. It is one of the best areas to pick Quahogs/Oysters in Merigomish Harbour.

We want to mention that our son, Andrew Thompson is currently a commercial fisherman who harvests Quahogs and Oysters in that area. This lease would definitely reduce his ability to harvest oysters/quahogs thus reducing his income to support his wife and young family.

Please take into consideration my concerns!

Thank you,

[REDACTED]  
Bryce & Donna Thompson

[REDACTED]  
Woodburn, NS  
[REDACTED]