

# Region of Queens Municipality

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Region of Queens Municipality

November 13, 2014

The Honourable Keith Colwell  
Minister of Fisheries and Aquaculture  
P.O. Box 2223  
Halifax, NS  
B3J 3C4

Dear Minister Colwell:

We understand that the license for the Ocean Trout Aquaculture farm in Port Mouton Bay will be considered for renewal in March 2015. We also understand that the operator, Ocean Trout, can be expected to order young trout soon in anticipation of the license renewal.

The Region of Queens Municipality, as well as many residents of our area, is strongly opposed to the Government renewing the license.

Our opposition is based, in large part, on the standards for site classification contained in the Doelle-Lahey Panel Independent Aquaculture Regulatory Review. I attach the pertinent sections, with comments in italics, for consideration.

Both the Federal and Provincial Governments have recognized the unique nature of Port Mouton Bay and have worked together to preserve its outstanding features. I refer of course to the Provincial Park at Summerville Beach, the Kejimkujik Seaside National Park and the current initiative to protect the Carters Beach area which had been recommended for protection by the FAO many years ago.

The Residents of Port Mouton Bay are most supportive of all this expenditure by Government to protect these jewels. I think it is true to say they see this as a basis to develop a green eco-tourist area which can help to revive the economy of the area which has been hit so hard by the closure of two fish plants.

A polluting fish farm in a 'RED' location with low flushing action is not compatible with this objective.

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*The South Shore's Great Experience!*

The Region of Queens is not opposed to fish farming. In fact, we are in periodic discussion with Cook Aquaculture with regard to their farm at Coffin's Island in Liverpool Bay. The operators enjoy an excellent relationship with local fisherman, and we appreciate the employment it brings to the area. The site is so different from the one in Port Mouton Bay. There is considerable flushing action in the Bay, and Port Mersey and its predecessor, Bowater Mersey Paper Company, has been an industrial site for well over 80 years.

In conclusion, we would urge you to consider the points raised by Messrs. Doelle and Lahey and listen to the wishes of the community and refuse to renew the license for the fish farm in Port Mouton Bay.

Sincerely,

Handwritten signature in cursive script, reading "C.L.A. Clarke".

Christopher Clarke  
Mayor

c: Premier Stephen McNeil – Nova Scotia  
Minister Mark Furey, Department of Service Nova Scotia & Municipal Affairs

# Doelle-Lahey Panel Independent Aquaculture Regulatory Review for Nova Scotia

## Draft Version for Public Comment - extracts for RQM

<http://www.aquaculturereview.ca/sites/default/files/Draft%20Report%20July%203.pdf>

### Topic: Site Suitability

“A suitable site is one that has appropriate biophysical conditions while being compatible with other economically, socially, and culturally important activities.

Using language from EGSPA (Environmental Goals Sustainability and Prosperity Act), it is a site that makes a net contribution to sustainable prosperity and that can be utilized in a manner that maximizes benefits while minimizing risk and negative impacts.” (page xv, para 1)

“We recognize that fin-fish operations, even if well regulated and operated, are not appropriate in all coastal waters around Nova Scotia. We conclude that a new regulatory framework must ensure that marine-based fin-fish farming only occurs in coastal waters that are suitable for that kind of aquaculture and where it is compatible with other important uses of those waters. For that reason, one of our core recommendations is the creation of a classification system under which coastal areas would be rated as green, yellow or red based on their relative suitability for fin-fish aquaculture.” (page vi, para 2)

The criteria for classifying areas in the system would be biophysical suitability and presence or absence of conflicts with other important uses or values. A green area would be one in which there was biophysical suitability and no serious conflict issues. A red area would be one at which biophysical conditions show that it is highly unlikely that environmental standards could be met at the site and/or at which serious conflict issues are present (page xv, para 6). This approach is consistent with the approach taken in Scotland. (page 66-67)

#### *Comment:*

*The Spectacle Island site in Port Mouton Bay qualifies as a red area in all aspects:*

*extremely low flushing capacity*

*serious conflicts with important existing uses - lobster fishery, Irish moss harvest, eco-tourism*

*serious conflicts with important values – Summerville Beach Provincial Park, and Carter’s Beach/Spectacle Island Nature Reserve and Spectacle Island Lighthouse Heritage designations*

“The regulatory framework we propose would also allow applications to the Minister to have a lease revoked if it has become clear through experience that the site is not suitable for a particular type of operation.”(page vi, para 3)

*Comment:*

*The Friends of Port Mouton Bay application to the Minister to decommission the Spectacle Island site at the time of lease renewal – March 2015 - is appropriate.*

### **Topic: Maintenance of Oxidic Conditions**

“It should be a basic and fundamental condition for the licensing of fin-fish aquaculture in a marine setting that oxidic conditions can be and have been maintained. Where experience suggests that the difficulty in maintaining oxidic conditions does not lie with the operation of the licensed operation or with its compliance with regulatory requirements but rather with the biophysical conditions of the site, it should be clear that the appropriate regulatory response is to require removal of the operation from the site or its conversion to a kind or level of aquaculture that is appropriate to the site.”(page 47)

*Comment:*

*The Spectacle Island site has failed to maintain oxidic conditions with depleted oxygen conditions at levels of hypoxic (polluted) to anoxic (grossly polluted) throughout the long record of its operation. The Environmental Quality Objective expressed in the Environmental Monitoring Framework Program for Marine Aquaculture in Nova Scotia is to maintain oxidic conditions.*

### **Topic: Social Licence**

“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.” (page 16, para 2)

*Comment:*

*For several years, the communities around Port Mouton Bay have consistently expressed a lack of social licence for open-net pen finfish aquaculture in this bay..*