

August 19, 2016

To Aqua.Admin@novascotia.ca

Administrator, NS Department of Fisheries and Aquaculture: Re: Aquaculture site #0602, Kelly Cove Salmon Ltd, Shelburne Harbour

I am writing to provide input regarding the renewal of lease and licence for aquaculture site 0602, Kelly Cove Salmon Ltd. in Shelburne Harbour, Shelburne County.

My concern is about the lack of a fulsome environmental assessment for this site in relation to the intended stocking level for a site of this scale (20 hectares) and duration of the approval (20Years). An earlier and smaller adjacent site operated by Kelly Cove was shut down due to high sulphide levels in the areas beneath the cages. It is my understanding that oceanographic conditions, ocean flows, sediments etc. are similar in the area covered by this new, renewed lease/licence with the result that a poor environmental outcome will likely result. The source for this research is Inka Milewski, marine biologist and former science advisor for the Conservation Council of New Brunswick. (**Factor iv.** “the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquaculture operation”; **Factor viii** “the number and productivity of other aquaculture sites in the public waters surrounding the proposed aquaculture operation”).

I am connected to this matter as a former member of the Advisory Committee to the Doelle-Lahey Panel on Aquaculture and, as citizen of this province who pays taxes to regulate this industry, operate the Environmental Monitoring Program and to subsidize its development in coastal waters which, after all, are a common property resource for all Nova Scotians. Limiting input to those adjacent is in my view an illegitimate attempt to “NIMBY-fy” the process and to limit input from other informed sources in the province. Such a restriction does not exist in other provincial policy fields such a forestry management or health care and education which is why I question its legitimacy.

As with all polluting activities, “the dose is the poison” which is why a precautionary approach and a rigorous environmental assessment are required before pollution levels in Shelburne Harbour shut out other existing uses of marine resources, lobster fishery etc. (**Factor iii.** Fishery activities in the public waters surrounding the proposed aquaculture operation”).

Thank you for the opportunity of providing input on this renewal application

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