

September 14, 2014

Keith Colwell  
Minister of Fisheries and Aquaculture  
Nova Scotia  
MIN\_DFA@gov.ns.ca

Minister Colwell,

I am writing in response to our meeting of September 3rd. I will not respond to all of the comments you made to the concerns that APES members raised, but would like to specifically respond to your statements about jobs and social license in relation to the marine based finfish industry.

Using the departments own statistics marine based finfish aquaculture is not a job creator. If your department has been tasked with job creation this is not the industry to be promoting and is not the way of the future. In Nova Scotia in 2003 the number of full-time equivalent jobs per million kilos of fish produced was 35.8. By 2011 this number was down to 27.1 FTE's per million kilos of production. When the two sites in Jordan Bay were recently approved the number of FTE's was only 9.6. With the industries impact on other jobs there may in fact be a negative job gain. The jobs that have been created are largely part-time, seasonal and low paid. We can do better than that.

In September 2010 Cooke Aquaculture promised 350 full time processing jobs by the end of 2011. This didn't happen. All fish that Cooke harvests in Nova Scotia are processed in New Brunswick. In July 2011, Nell Halse of Cooke Aquaculture stated that a processing plant would open in Shelburne by the fall of 2012. This didn't happen. What happened to our \$25 million dollar investment?

Norway, which is one of the worlds largest producer of feedlot finfish produces six(6) times the amount of salmon that Canada does with the same labour force that Canada currently employs. Increased production does not mean more jobs. It is an industry that is increasingly mechanized.

You said, "that we need to grow our economy in the right way". This is not the way to do it. More jobs are created by shellfish aquaculture and good jobs can be created by on land finfish aquaculture. We believe that if you do a full cost accounting to include all costs that marine based farms do not presently pay, that the future is on land. If marine based fish farms were required to be environmentally sustainable, without government assistance and no compensation was given for mass mortalities these farms would be an economic disaster.

APES is very disappointed that your government appears to be continuing on the same path as the previous N.D.P. government by dismissing the innovative idea of a land based finfish aquaculture industry. Lobbyists for the ocean based finfish aquaculture industry and their proponents, like Gardner-Penfold have created the myth that land based finfish farms are not feasible. They have conveniently ignored the additional costs of ocean based feedlots referred to above ie: Government handouts, compensation for mortalities, cheap licenses and no responsibility for environmental cleanup. . There are successful land containment systems in France, Denmark, China, USA, British Columbia and here in Nova Scotia. The Ivany Commission calls for "new vision, innovative approaches, greater collaboration and greater willingness to take on risks associated with economic change and progress." The same old approach is what your office presented to us.

You do not have the social license to proceed with this industry on the Eastern Shore. We have polled the residents of Spry Bay and Shoal Bay and 95% of them are opposed to marine base finfish farming. The risks to those industries on the eastern shore that are our backbone, namely the lobster fishery, shellfish aquaculture and tourism are too high. We maintain our position that there should be a moratorium on marine based finfish farms until objective science and economic analysis can show that there will be no harm to existing industries and the coastal and estuarine environments of Nova Scotia and until the process for granting or renewing licenses is transparent and repaired of its flaws.

We are also very disappointed that Bruce Hancock is in the position that he is as he has an obvious bias towards the industry. Also his "attitude" does not reflect the "change in attitude" that is called for by the Doelle-Lahey panel and your newly elected government. When we asked about the status of the Owl's Head license, which is a question that should be easily answered by your department, Mr. Hancock's response was "ask the company". This attitude does not bode well for the relations between our community, the department and the industry.

Your government's response to the concerns that citizens raised about the fracking issue was a democratic and forward looking decision. Unlike the fracking ban's impact on jobs, we are proposing a job creation alternative to the existing ocean based finfish disaster. The development of a land based finfish industry would see Nova Scotia ahead of the pack in a trend that will eventually become the norm. The result is a finfish industry without antibiotics, without the use of pesticides, without polluted harbours and without the threat to the existing lobster/shellfish industry and our wild salmon. Consumers will benefit from a healthy and sustainable food source.

We trust that you will seriously look at the alternatives that we are presenting, and we look forward to meeting and working with your government in the future.

Wendy Watson Smith  
President  
Association for the Preservation of the Eastern Shore  
(APES)