Association for the Preservation of the Eastern Shore (APES)

Statement of Precautionary Principles

> *APES calls for a 5 year moratorium on open pen finfish aquaculture until the process for granting or renewing licenses is transparent and repaired of its flaws and until independent 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.*

Science National and international (Borgia et al, 2009) science shows that risks may include:

1. Faecal matter from farmed salmon feedlots cause high levels of sulphides that have deleterious effects on sea bottoms, biodiversity, eel grass, rock weed, lobster and wild fish (herring, mackerel) habitats and nurseries, shorelines, and wildlife (Milewski 2011).

2. Full recovery of fallowed sites (eg. Port Mouton and Shelburne) is slow and incomplete (Milewski 2011).

3. Chemicals (legal and illegal) administered to salmon feedlots to kill sea lice and other diseases common to farmed salmon are lethal to lobster, lobster larvae, and deleterious to sea urchins and scallops. (Wiber et al. 2012)

4. Salmon feedlots endanger the genetic and health viability of wild salmon (Thorstad et al. 2008).

5. Visible and chemical analysis confirms that areas of open pen salmon feedlots despoil waters and shorelines with algae blooms and slimes causing hypoxia and even methane gas release (Milewski 2011).

Economics Imposition of open pen finfish feedlots has the potential for numerous negative impacts that could lead to a net jobs and income loss on the Eastern Shore (McIver, AIMS 2012). For example:

1. The lobster fishery is the economic backbone of the Eastern Shore. Any harm to lobster stocks could endanger this fishery and the inhabitants of coastal communities.

2. International lobster marketing relies increasingly on food security and traceability. And real or perceived contamination of lobstering waters could be catastrophic to this marketing strategy.

3. The DEANS (Destination Eastern and Northumberland Shores) and TIANS (Tourism Industry Association for Nova Scotia) brands for tourism on the Eastern Shore are *pristine* and *unspoiled*. The presence and pollution of open pen salmon feedlots could harm this brand and our sustainable tourism operators.

4. The Gardner-Pinfold (2011) study shows that each wild Atlantic salmon caught and released is worth $2,500 to the tourism and recreational fishing industries. The Nova Scotia Salmon Association has spent almost a million dollars and hundreds of volunteer hours restoring the wild Atlantic salmon to the West River of Sheet Harbour. This recovery would be endangered by open pen salmon farms.

5. Salmon feedlots could deter new settlement on the Eastern Shore. Building trades could suffer from a decline in new house building and repairs. Local businesses could suffer from decreased consumption.

6. Taylor`s Head Park and the Eastern Shore Wildlife Management Area, home to endangered species and numerous protected nesting grounds, could be damaged by proposed sites that border on their shores. This would also deter activity-oriented tourism and fitness.

7. Significantly fewer finfish aquaculture jobs than promised have materialized on the southwest coast of Nova Scotia and in Newfoundland. Automation is decreasing these numbers even further. The jobs that do exist are typically low-paying, often part-time, and may require the use of chemicals that can be hazardous to health.

8. Almost $100 million in subsidies and crop failure remediation has been granted to the salmonid aquaculture industry in NB since the 1990's. Given the recent (2012) confirmed outbreak of ISA in Shelburne, NS, and the ISA-driven collapse of finfish aquaculture operations in Chile in recent years, it seems prudent to weigh the costs of such failures in any assessment of the cost-benefit structure of the industry for the province. Substantial industry subsidies and indemnities may well off-set tax revenue gains (Abbott, Fuller, ACAR 2012).

Flawed Licensing Processes

1. Democratic public and community stakeholder consultation is barely extant and grossly unbalanced compared to direct government assistance granted to the proponent. APES requests, again, to be a part of the NSDFA Working Group for licensing in our area.

2. The Environmental Impact Assessment provided for the proponent by Sweeny International is geographically inappropriate, error-ridden, and little more than a template of other EIAs by Sweeney International for other licensing requests that have been granted in NS. So far no licensing request in NS has ever been denied.

3. Both Federal (Hargrave 2002) and Provincial (Stantec 2009) guidelines for the suitability of approved sites for salmon feedlots are disregarded by the current licensing process. The proposed sites for the Eastern Shore do not meet the criteria as stipulated by either Hargrave or Stantec, for example as regards minimum depths and currents.

Alternatives to risks posed by open pen finfish aquaculture

Nova Scotia could be a leader in the aquaculture industry, not a follower. APES supports appropriately sited closed pen aquaculture for the Eastern Shore when 1) those communities affected have been properly consulted and had access to economic development officers; 2) when stringent independent Environmental Assessments have been made; and 3) where the government's own guidelines have been properly utilized. Such a finfish aquaculture program could be environmentally sustainable, labour intensive, and ahead of the curve of market demand for healthy, sustainable seafood.