

May 5th 2010

Law Amendments Committee

RE: Bill 53 – Fur Industry Act

To whom it may concern,

I am the Water Coordinator with the Ecology Action Centre in Halifax, NS. I am writing concerning the complete lack of democratic process in the passing of Bill 53 – Fur Industry Act through second reading and Law Amendments. It is entirely unacceptable to have allowed only three business days between the first reading of a bill and Law Amendments. Many organizations and individuals that have been impacted by the fur industry in Nova Scotia were prepared to present during Law Amendments. Having operated so quickly has prevented these groups from presenting their concerns about Bill 53 and has effectively silenced them in a most undemocratic way.

Given the failure to allow sufficient time to participate in the due process with Bill 53, I am respectfully requesting an opportunity to present my concerns with Bill 53 to the Law Amendments committee. Organizations that are concerned with the intense growth of the mink farming industry in Nova Scotia have not been adequately consulted in the development of this act. This letter provides a short synopsis of my concerns with Bill 53 but it does not adequately represent what we would have presented to the Law Amendments committee had I been given a chance.

This is an extremely important piece of legislation for the public given the risks to human health and the environment. There has been a clear lack of public consultation on the issue to date, most importantly whether this is actually an industry that the Department of Agriculture should be actively promoting. There needs to be a true-cost accounting of the mink farming industry to assess the benefit it provides to the environment, society and human health and economy beyond immediate monetary gain. The Genuine Progress Index Atlantic would be able to provide a true-cost accounting of the impacts of this industry as compared to alternative economic activities such as sustainable local food production. The most pressing sustainability issues relate to the quality of our water, our most precious resource. There is very little policy coherence with other strategies being developed by Nova Scotia Environment, including the Water Resource Management Strategy and the Wetland Conservation Policy.

Bill 53 is also an important piece of legislation because it is an initial attempt to respond to public concerns about the fur farming industry and the Department of Agriculture should be commended for initiating this process.

I am however deeply concerned with the extensive discretion granted to the Minister of Agriculture and the apparent conflict of interest he has as the regulator and the champion of the fur industry. Allowing inspectors from the Department of Agriculture to have sole inspection capacity over mink farms is very

troubling. I would like to see this improved by having inspectors from Nova Scotia Environment involved in any inspection. It is highly imprudent to allow the Department of Agriculture full control of this industry without allowing Nova Scotia Environment to have any authority.

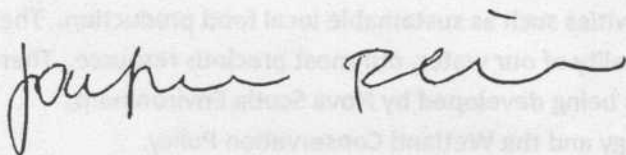
In addition to involving the Department of Environment investigative and compliance authority, the following amendments need to be made to the Bill in order to balance the extensive discretionary role of the Minister:

- The public needs to be involved in the development of regulations, standards, guidelines to promote and inspire public confidence.
- There needs to be increased transparency by providing a free public registry containing information on the terms and conditions under which each mink farm is operating. This would include information about their locations, the number of animals on site, the siting of waste disposal facilities and their compliance with the NS Environment Act.
- The Bill must allow for public comments to be made and investigated
- There must be an allowance for appeals through a formal appeals board such as an Environmental Appeals Board similar to what the province of Ontario has. This would allow residents to make their concerns known and avoid personal intimidation

I am also very concerned with the extended timeline for existing farms to meet the requirements within the act. This industry has grown exponentially with very few regulations in place and there needs to be a requirement for compliance within one year of the Act coming into force.

In closing, I am deeply troubled with the lack of forum for public comment on Bill 53, It is entirely undemocratic and I re-emphasize my interest in presenting these, and additional concerns to the Law Amendments Committee.

Respectfully,



Jocelyne Rankin

Water Coordinator

Ecology Action Centre