

Clean Foundation

July 26,2021

Submission on the Sustainable Development Goals Act

From the Association for the Preservation of the Eastern Shore (APES)

Attention:Engagement Coordinator

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I am writing to you as the president of the Association for the Preservation of the Eastern Shore. Our organization was formed in 2012 when residents and businesses on the Eastern Shore of Nova Scotia became very concerned about Fish Farm leases that were being proposed for our shore. The communities of the Eastern Shore came together as we concluded that not only would this proposed industrial development pollute our waters, it would threaten our backbone industries of lobster fishing and tourism. When a door to door campaign was conducted 93% of people in our communities were opposed to the development of fish farms in our harbours. This industry has no social license.

Since that time we have monitored developments not only on our shore but around the province, country and internationally and our conclusion about the unsustainability of the marine based finfish farm industry has remained. We are members of the Healthy Bays Network, a provincial network of people who are opposed to marine based fish farming.

Open pen finfish aquaculture is NOT an environmentally sustainable industry and as such cannot lead to longer term sustainable prosperity for Nova Scotia. The ongoing problems are too great to be tweaked by band aid measures. These include:

- \*threat to wild caught fisheries especially lobster which is an important and sustainable industry in our province and is dependent on our “pristine” waters.

- \*persistent noise,smells and light pollution in coastal waters.

- \*proliferation of sea lice and infectious diseases.

\*escaped fish that have a devastating impact on Atlantic wild salmon undermining recovery efforts.

\*feces, chemicals and antibiotics degrading the marine environment

\*broken and abandoned net pen debris.

\*threat to tourism and the “clean Nova Scotia” brand

\*degraded recreational opportunities (swimming, boating, beach walking)

\*inadequate regulations and enforcement despite government claims to the contrary

\*violation of social license, transparency and accountability

**RECOMMENDATION:** The provincial government should stop investing and promoting this production model. There needs to be a moratorium put on any new and expanded leases for marine based finfish farms and a transition plan must be developed to get existing farms out of the water. Many other jurisdictions are getting out of this business model and moving to land based RAS systems where environmental issues could be more easily controlled.

Recently, two fish farm leases were renewed on our shore at Owls Head and Ship Harbour. This, despite loud opposition from 42 local organizations and individuals who made submissions in the process. Concerns included pollution, escapes, antibiotic and pesticide use and effects, loss of biodiversity and habitat for wild fish and other species and risks to the lobster fishery and local tourism. The lease was approved with conditions and the proponent has been in non compliance since October 2020. The gear and equipment at the site that resulted from past aquacultural operations was to be removed from the water and adjacent shoreline by this date. This has not been complied with to date even though ongoing complaints have been filed by local individuals and our organization. Our experience is that once leases are approved the local community and concerned organizations lose any ability to raise concerns.

Our organization has been and is concerned about sustainable prosperity that grows our economy while protecting the environment that our economy is so dependent on. Coastal communities around Nova Scotia have been leading the fight to keep fish farms out of our harbours because of the negative environmental and social costs of this industry on our public waters. Community town hall meetings have been packed with people who have many concerns on how this industry will affect their livelihoods, their lives, the environment and their futures. The provincial government continues to propose solutions for rural economic development that are supposedly for “our own good”. The voices of coastal communities who have knowledge and ideas about how to grow our economies while protecting the environment where we live need to be heard. The provincial government has been very patronizing in excluding our voices. We have been saying loud and clear that it is vital that our marine environment is kept healthy.

The present regulations for the proposed development of marine based fish farms exclude community voices. The Aquaculture Review Board, which is the body to hear public concerns about new and expanded fish farm leases, has interpreted the definition of those who are allowed to intervene very narrowly. What is the legitimacy of these restrictions given that one of the legislative purposes of the Nova Scotia Fisheries and Coastal Resources Act, Section 2 (f) is to foster community involvement in the management of coastal resources? It is important to keep in mind that waters that are leased for aquaculture continue to be public waters. There are no such restrictions on public participation in assessment processes for other industrial developments such as mining, offshore oil and gas and construction projects. The spirit of full public participation that was recommended by the Doelle Lahey report is not reflected in the regulations.

**RECOMMENDATION:** Coastal communities need to be genuinely engaged in the development decisions that affect them directly. The patronizing attitude of the provincial government when it comes to rural development in particular needs to stop!

The Finfish Farm industry is regulated through a series of Memorandums of Understanding (MOU's) between the Provincial and Federal governments. Unfortunately the politicians who are responsible for protecting Nova Scotians and their environment through regulation of this industry are the biggest promoters of the industry. This is a serious conflict of interest.

**RECOMMENDATION:** The government needs to do the job of regulating industries and protecting our environment.

As rural coastal communities we are on the front line of the effects of climate change with increasing water temperatures, changing and eroding coastlines and the increase in storm, flood and drought events. It is important to look at those factors that will help to mitigate these changes and that will help us adapt to our new environments.

**RECOMMENDATION:** Identify and protect eelgrass beds that act both as absorbers of CO<sub>2</sub> and as habitat for marine species.

Areas of fragile coastline and the adjacent ecosystems need to have real protection from industrial development. Any proposed development should have to be subjected to public consultation and a third party environmental assessment.

During the DFO's Area of Interest process for an Eastern Shore MPA, we (all participants in the process) were confined by jurisdictional limitations which prevented the assessment of impacts of land based industries such as forestry and mining on the marine ecosystem. This, despite well documented, historic impacts of these industries on the riparian zones of estuarial rivers and marine estuaries.

**RECOMMENDATION:** Any inland industry or development such as mining and forestry that could cause harm to coastal ecosystems must be remediated and all future developments need to undergo environmental assessments that take this interaction into consideration.

Thank you for the opportunity to participate in these consultations.

Wendy Watson Smith, President  
Association for the Preservation of the Eastern Shore

