

Antigonish Rivers Association Submission to the Doelle-Lahey Panel

The Antigonish Rivers Association is a volunteer organization of recreational anglers and like-minded individuals who are dedicated to the protection and enhancement of the aquatic habitats in our region, to sustaining a healthy fishery resource, to promoting angling for all community members, to working towards a sustainable model of fisheries management and to supporting the education of anglers in terms of fisheries regulations, ethics and safety for a healthy resource. We believe that the current industrial model open pen ocean based fin fish aquaculture practices in this province are environmentally and financially unsustainable. We recognize that a well regulated aquaculture industry is needed to develop food resources and a viable rural coastal economic policy. With this in mind we would like to raise the following concerns and make recommendations for going forward.

We have a number of serious concerns with current finfish aquaculture and government practices:

- The negative effects of huge concentrations of sea lice and the proliferation of diseases such as ISA in caged based salmon pose enormous risks for wild Atlantic Salmon which are already classified by COSEWIC as Endangered along our Atlantic coast and as a Species of Special Concern along the Northumberland Strait. These same risks exist for sea run Speckled and Brown trout which are key species in the recreational fishery.
- The huge numbers of fish in open cages pose the risk of escapement which raises issues of genetic contamination and competition with existing salmon stocks. The pollution of water and ocean bottom that results from these huge numbers is a serious problem.
- The dismantling of the Department of Fisheries Habitat Division and the conflicting role of DFO as the protector of wild fish stocks while promoting aquaculture raises serious conflicts. The lack of funding for marine research through DFO or by other agencies is also a serious issue.
- The effect of industrial scale aquaculture poses serious risks for traditional fisheries especially lobster and other shell fish which are the mainstay of our coastal economy.
- The use of pesticides poses health issues for marine life as well as human consumption not just of farmed fish but for all of our marine life.
- The marketing of ISA contaminated fish and the lack of transparency in the industry raises concerns. In addition, the health effect of consuming farmed salmon on a regular basis is also troubling. This lack of transparency and poor industry practices makes the industry susceptible to a rapid market crash if consumer groups or specific markets such as the USA or Europe close their doors to farmed salmon

The Antigonish Rivers Association would like to make the following recommendations:

- That the government of Nova Scotia take this opportunity to develop a sustainable closed system, land-based aquaculture for fin fish that will produce high quality product for a market place which is increasingly demanding a healthy, sustainably produced product.
- That Nova Scotia become a world leader in sustainable aquaculture practices. We believe the province has the models, the technological expertise, the university, college and industry research systems and human resources to become a world leader and exporter of technology and methods for sustainable aquaculture.
- That the current government funding for existing large scale open pen aquaculture operations be reviewed with the intent of funding an industry based on best practices.
- That the policy of the federal government to pay for the destruction of diseased fish be abolished as it provides no incentive to promote best practices in stock selection and rearing practices. Rather we should provide incentives to promote the development of disease free, high quality fish.
- That a fund administered by an independent body be developed from industry revenues. This fund would be used to promote marine and riverine enhancement projects as well as scientific research in fisheries issues.
- That the current practice of grandfathering permits be abolished and that all sites be subject to an environmental and community review. Clear guidelines which are designed to consider the location, water currents, tidal patterns, bottom type and native marine and riverine populations need to be developed to guide site selection and usage.
- That research be funded to develop an index of current marine populations, the need for buffer zones and a risk assessment for the coastal areas considered for aquaculture.
- That an independent agency be created with the power to control and regulate aquaculture and coordinate the various roles and functions of federal and provincial departments.
- That clear regulations with substantial penalties be developed and enforced to promote best aquaculture practices. Any penalties collected from such enforcement be used directly to fund marine and riverine enhancement projects (via the independent body in point #3).
- That the government and industry develop policies and practices that promote greater transparency to include the public and local communities in both planning and sharing of information on escapement, disease and other issues.

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