



A Backgrounder from

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JUNE 2018

SUMMARY OF THE ATLANTIC SALMON FEDERATION'S COMMENTS ON GRIEG NL SEAFARM'S ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE PLACENTIA BAY SALMON AQUACULTURE PROJECT

CONCLUSION

The EIS is highly deficient in many areas. It does not answer the numerous public and scientific concerns that have been raised, nor does it meet the specific guidelines issued to the proponent by the Newfoundland and Labrador Government's Environmental Assessment Division.

Recommendation: ASF recommends that the EIS be declared "deficient" by the Environmental Assessment Division and sent back to the proponent for significant further work.

LIST OF KEY DEFICIENCIES:

- The proponent has made no effort to collect baseline data on threatened wild Atlantic salmon in Placentia Bay despite lack of data on wild salmon being a key reason why the EIS was ordered. The EIS guidelines identified abundance, migratory patterns, genetic population structure, health, and fitness of wild salmon as key areas where more data are needed.
- The proponent continues to claim that any escaped salmon will be sterile and not able to interbreed with wild salmon but have provided no evidence to support this claim.
- The impact of the spread of sea lice from sea-cages to wild salmon has not been adequately addressed. The proponent plans to use cleaner fish (lumpfish) to attempt to control sea lice in the cages, but provides no evidence that this will prevent sea lice from spreading to wild salmon. The impacts on wild salmon from sea lice outbreaks in the farms have not been assessed.
- The extent to which pesticides and antibiotics are likely to be used has not been fully acknowledged, and the potential impacts of the use of these chemicals on the environment has not been adequately assessed.
- The proposed follow-up monitoring program is completely inadequate for assessing the effectiveness of proposed mitigation measures and for determining if any unexpected environmental impacts occur. Monitoring programs are needed for sea lice and disease impacts on wild salmon, movement of escaped farmed salmon into rivers, ecological interactions between wild and escaped farmed salmon, and abundance and genetic integrity of wild salmon.
- The proponent has not provided a balanced and defensible analysis of the potential for using land-based facilities instead of sea-cages. Insufficient, inaccurate, and misleading information has been provided to justify rejecting the land-based alternative. Conclusions around the carbon footprint, land and water use, and electricity needs of land-based facilities are not supported by the information provided.