

Region of Queens Municipality

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Region of Queens Municipality

February 13, 2019

Kelly Cove Salmon Ltd.
669 Main St.
Blacks Harbour
New Brunswick
E5H 1K1

Cooke Aquaculture Inc.
874 Main St.
Blacks Harbour
New Brunswick
E5H 1E6

Attention: Joel Richardson; Jeff Nickerson; Andrew Lively

Gentlemen:

Kelly Cove Salmon Ltd. applied for and received a six month scoping Option for Liverpool Bay from the Nova Scotia Department of Fisheries and Aquaculture on September 7, 2018.

On behalf of Council of Region of Queens Municipality, you will find listed below a number of issues which Kelly Cove Salmon/Cooke Aquaculture are hereby being asked to research and address during that Option period. Scientific and other data compiled during the scoping Option process in Liverpool Bay, as well as this correspondence, is expected to also accompany an aquaculture application, should you decide to request an expansion or new aquaculture site in Liverpool Bay.

These items have been compiled from comments provided to Council from the public gallery, including letters and e-mails received from local citizens, as well as from individuals with seasonal properties located in Queens.

It is our expectation that all scientific data, research, and public consultation information and reports will be available to the public on your website or other suitable location, in a timely manner after an aquaculture application is filed with the Province, should you decide to submit an application.

- 1) Carrying capacity of Liverpool Bay is critical especially regarding nutrient loading levels. Please identify the expected wild fish contribution to nutrient loading in Liverpool Bay as well as the projected daily waste created by the existing fin fish pens and any proposed expansion or new locations. A chart providing this information from a juvenile fish size to adult market size held in pens on a quarterly projected basis from 2015 going forward to the present, would be a suitable minimum projection.
- 2) Determination of the flushing rates of the bay in locations near existing and proposed pens, including providing tidal flows, speeds, and directions during 12 hour cycles throughout all months of the year would be expected.
- 3) Uneaten food loss also is a contributor to oxygen depletion and sediment buildup. Please provide an historical record of projected uneaten food loss for the last 5 years, which will also cover the recent years when the electronic feeding system has been installed, which is expected to have reduced uneaten food loss. Any impact change experienced with the newer feeding delivery should also be clearly identified in the data.
- 4) Clarify and summarize the process and management of electronic feeding equipment and the controls in place for operation of the equipment. Identify the manpower utilized to deliver feed to the site and the frequency, as well as those numbers of employees necessary to maintain and repair the pens.
- 5) Please identify the value of all purchases and expenditures in Queens County by the Proponent in 2018, which supported local business as well as the total number of company employees who work in Queens. Please also identify the projected future increases applicable to these two items should an expansion be proposed in Liverpool Bay.
- 6) Identify the component ingredients of the fish feed to be utilized at fin fish pens in Liverpool Bay.
- 7) Identify the history and future probability of a sea lice infestation to be anticipated at pens in Liverpool Bay, and the future methods to be utilized to mitigate any future sea lice impacts.
- 8) Identify the current and potential future usage of all chemicals, pesticides, hormones, antibiotics, or other compounds to be utilized in Liverpool Bay which are not naturally occurring in Liverpool Bay.
- 9) Provide a Policy or Plan which states the procedure to be followed to help prevent fish loss and to identify any diseased or dead fish in pens, the inspection frequency, removal of those fish, as well as their disposal location.

- 10) Clarify the frequency, purpose, and testing criteria for all water quality sampling and testing conducted presently, as well as testing expected to occur in the future, at fin fish pens and adjacent areas, both present and planned, in Liverpool Bay.
- 11) Provide a Policy, Plan or Procedure that clearly identifies the ability to predict and/or monitor an extreme thermocline occurrence prior to it actually occurring, and the mitigating procedures which will be followed, as well as the applicable timeframes.
- 12) Provide storm impact modeling to predict the destructive impacts to any current pens, or new pens to be situated within Liverpool Bay, resulting from all potential storms from all directions, at all wind speeds and wave heights, during all periods of the year. Predictions should also exist as to where destroyed or damaged gear would be expected to end up within the Bay after all potential storms.
- 13) Provide a Policy, Plan or Procedure that clearly identifies and ensures how all lost aquaculture related materials, fish mortalities or escapees will be located by the proponent and recovered in a timely manner.
- 14) Please create and maintain an ongoing log book system, if one does not presently exist, to record the times of each visit to the fin fish pen site, employees or others present, the purpose of the visit, and any items of interest which were observed by those present.
- 15) Please clarify the process and locations to be utilized to repair, maintain and store local aquaculture equipment in Queens.
- 16) Provide a Policy, Plan or Procedure that clearly identifies and ensures that any aquaculture caused negative beach impact to Beach Meadows Beach or the shoreline in the Bay will be immediately rectified.
- 17) Coastal lands of Coffin Island and Beach Meadows Beach area have both been previously identified by the Province of Nova Scotia as being Environmentally Significant Wetlands, during their Provincial coastal mapping efforts. We would ask that all due consideration be given to this fact when completing aquaculture research and related planning efforts.
- 18) Identify the area in square metres of the bottom area occupied by the current fin fish farm lease, and the size of any new proposed lease application space, which has been or will be removed from access to commercial, recreational, divers or Indigenous users pertaining to fishing, boating or other usage.
- 19) Please identify the projected commercial fishing value of the size of the area which is no longer accessible to commercial fishers, as well as that of any proposed expansion.

- 20) The Brooklyn Marina is home to many recreational boaters of all types including sailboats and kayaks. Significant surface area removed from their recreational usage may become more prominent, impact membership, and eventually cause fundraising to become a problematic issue. How can this concern be successfully mitigated and incorporated into future planning to maintain suitable recreational boating space to continue for the benefit of Marina members?
- 21) Shipping lanes in Liverpool Bay are important to Port Mersey and all users of Liverpool Bay, and would be expected to become critically important in the future should new tenants at Port Mersey require increased ocean access and transportation of goods. In view of the storm potential in the main harbour, pens are not anticipated to become a conflicting issue, however this future need is identified for your planning consideration.
- 22) The location of the existing fish pens site and any new pens should be marked with buoys to identify the outer boundaries, and be clearly visible to all marine users both night and day. A shipping lane must remain open to ensure that safe and easy travel access to Coffin Island remains.
- 23) Bear Cove Resources operates in East Berlin, Queens County, N.S. harvesting local washed up seaweeds under a license issued by the Nova Scotia Department of Lands and Forestry. That material is then composted, processed and packaged at their site. It is marketed as a soil amendment or seaweed fertilizer, under the trade name Storm-cast. Organic growers are primary customers and demand clean, chemical free products. Please address the potential of an increased aquaculture operation negatively impacting that commercial operation, and if so, what those potential impacts may be, and what steps Kelly Cove Salmon would be able to implement to mitigate potential impacts.
- 24) This correspondence is not intended to limit the ability of Region of Queens Municipality, or its citizens, to participate at any stage of the formal Provincial Aquaculture process in the future.

We trust that the above items are self-explanatory, however I would be pleased to further discuss any of these issues at your convenience.

Respectfully;

David Dagley
Mayor