

## NS Law Amendments Committee

Regarding: Bill No. 95

An Act to Amend Chapter 25  
of the Acts of 1996,  
the Fisheries and Coastal Resources Act,  
Respecting Aquaculture

Monday, April 27, 2015

Dear Chair and Committee members:

Clause 1. of the bill would have section 2(d) of the Fisheries and Coastal Resources Act read “The purpose of this Act is to support the sustainable growth of the aquaculture industry;” This statement is not in accord with the recommendations of the Doelle-Lahey report.

From the report:

page viii a. The regulation of aquaculture will be functionally separated from the promotion of the aquaculture industry.

page 114 The DFA’s regulatory activities should be separated within the DFA from its non-regulatory activities in supporting the development of the industry.

I do not believe that the government should be compelled by law to support the growth of any industry. DFA, the ocean and marine life would be better served if the Act dealt only with regulations. The proposed amendment should be struck or replaced with a statement such as:

2 The purpose of this Act is to

(d) establish a world-class regulatory framework for aquaculture development in Nova Scotia;  
(from Minister Colwell’s news release April 21, 2015.)

Clause 3. As the fin-fish aquaculture industry uses medications and pesticides in the fish feed, and as it has been proven that wild fish also eat this feed and that commercial and private fishers catch wild fish near aquaculture sites, we recommend that, for the protection of human health, the public be informed in advance when any of these products are to be used.

It is our first hand observations of activities on an aquaculture site that compels us to stress the importance of this subject. We were close enough to the site to see when medicated feed was being used and to see feed that was misdirected and landing in the water outside of the cages. We saw a feed pipe that had separated from the cage, none of the feed made it to the salmon, it all went outside of the cage.

At the same time, while medications were in the feed, there were lobster fishermen setting traps next to the site and private fishermen that would tie-up to the sites buoys and catch wild fish. The public will never know the consequences of eating those fish, and doctors have no information to go on as only the operator of the site knows what the medication was.

I submit that having to ask DFA for information on medications and pesticides (as may be allowed in 8(5)(a)) is not sufficient to ensure that the public is aware that wild fish near a site may be contaminated with these products. Therefore we ask the committee to amend the Bill to add:

8 (6) A veterinary medical record that states when and where medications or pesticides are to be used will be made public in advance of using them.

I would also recommend that a warning system be used at the site to alert others that chemicals are being used in the open water. I consider the willful deposit of chemicals and drugs into the open water to be a crime against nature.

The Doelle-Lahey Final Report seems to recommend a thoughtful and balanced approach to aquaculture in Nova Scotia. Bill 95 has adopted a few points from the report, modified a few others and completely ignored most of it.

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The way to minimize future conflict between the public, government and industry is to completely overhaul the Fisheries and Coastal Resources Act, which was not done in this Bill.

I therefore request that the committee reject Bill 95 completely and send it back to DFA for them to implement the Doelle-Lahey recommendations, in full.

Thank You,  
Ronald Neufeld