

## **Findings and Decision - New Application of Kelly Cove Salmon Ltd. for AQ#1436**

### **1. Overview:**

On August 30, 2019, the Nova Scotia Department of Fisheries and Aquaculture (NSDFA) received an application from Kelly Cove Salmon Ltd. for a new Aquaculture Licence #1436 (AQ#1436), as described below:

Table 1. Description of Aquaculture Licence #1436

<b>Type:</b> Land-Based	<b>Location:</b> Centreville, Digby County
<b>Number:</b> AQ#1436	<b>Species:</b> Atlantic salmon
<b>Applicant:</b> Kelly Cove Salmon Ltd.	<b>Proposed Term:</b> 10 year Licence
<b>Summary of Application:</b>  Kelly Cove Salmon Ltd. (KCS) submitted a new aquaculture application (#1436) for the land-based cultivation of Atlantic salmon. The proposed activity is planned to occur on private land at PID#30165625, which is located in Centreville, Digby County. This project involves the development of a land-based facility that represents all freshwater stages of production. The facility will have four independent modules for different stages of production: Egg incubation modules, First feeding modules, Parr modules and Smolt modules. These smolt will be transferred to KCS marine aquaculture sites.  The proposed land-based facility will significantly shorten the time fish spend in sea cages before harvest. This reduced time at marine sites will also allow a much easier way to manage biological and environmental challenges including severe weather conditions and disease outbreaks. Extending the time smolts and post-smolts spend in land-based recirculating aquaculture systems will also allow the company to better optimize its stocking plans to achieve best use of both its freshwater and saltwater operations.	

### **2. History**

AQ#1436 is a new licence. The applicant, Kelly Cove Salmon Ltd. has never held a Licence for this facility or location with Nova Scotia Department of Fisheries and Aquaculture.

### **3. Procedure**

#### *3.1 Performance Review*

A performance review of the information submitted by the applicant in support of their application was completed. This review recommended that the licence be issued based on the technical and biological assessment. This performance review is required pursuant to Subsection 72(d) of the *Aquaculture Licence and Lease Regulations* and was completed on February 24, 2021.

### 3.2 Public Comment Period

Notice of the application AQ#1436 for the 30-day public comment period was published on NSDFA's website (<http://novascotia.ca/fish/aquaculture/public-information/>) for the period of January 14, 2021 to February 12, 2021. Notice of the application was also published in the Royal Gazette Part I on January 14, January 21, January 28, and February 4, 2021.

### 3.3 Submissions

14 submissions were received by NSDFA during the 30-day public comment period. All 14 of these submissions met criteria for consideration and are included with this document. Several items of note were raised that will be further discussed in the *Factors to be Considered* section of this document. One (1) submission was received after the 30 day public comment period and therefore did not meet criteria.

## 4. **Factors to be considered**

As per the *Fisheries and Coastal Resources Act* and the *Aquaculture Licence and Lease Regulations*, decisions with respect to new land-based aquaculture operations are within the purview of the Administrator (“administrative process”) and are not submitted to the Aquaculture Review Board for decision. The *Fisheries and Coastal Resources Act* defines aquaculture as:

*‘the farming for commercial purposes of aquatic plants and animals over which the Minister exercises control but does not include raising or breeding in tanks, nets, pens or cages of aquatic plants and animals as aquarium species, in laboratory experiments or by individuals on their own property as food for their own use’*

As such, an aquaculture licence for landbased finfish aquaculture issued pursuant to the *Fisheries and Coastal Resources Act* only grants an approval to conduct commercial farming of the identified finfish species. The operators of AQ#1436, by condition of licence, would be required to comply with any permits, protocols, approvals, licenses or permissions which may be required under the laws of the relevant Municipality, the Province, or Canada. Kelly Cove Salmon Ltd. will be responsible for confirming any of the before-mentioned requirements and ensuring compliance with them. Such requirements may include, but not be limited to, an Introductions and Transfers permit from Fisheries and Oceans Canada for the movement of finfish, Nova Scotia Department of Lands & Forestry and Transport Canada for the placement of pipelines or associated structures, and the Municipality of the County of Digby for permitting of new constructions.

In particular, Kelly Cove Salmon Ltd. must adhere to the Fisheries and Oceans Canada *Aquaculture Activities Regulations* (AARs) and the provincial and federal requirements relating to the acquisition and movement of live finfish. Kelly Cove Salmon Ltd. must also adhere to all relevant environmental legislation and Municipal requirements with respect to the intake and outflow of water, as well as the storage of hazardous materials. Kelly Cove Salmon Ltd. must also ensure compliance with the *Special Places Protection Act* as it relates to archaeology artifact findings that may occur in the course of the aquaculture operation.

A portion of the public submissions received were related to aspects of marine finfish operation in Nova Scotia and as such are not within scope for the land-based aquaculture application decision for AQ#1436. The issuance of AQ#1436 is thereby considered on its own merits, and does not consider the marine aquaculture sites issued to Kelly Cove Salmon Ltd.

Additional concerns were related to the level of detail provided for public review as part of the application process. The Department of Fisheries and Aquaculture does not post application details, with the exception of site location, applicant, species and cultivation information, as part of the public submission process for land-based aquaculture operations which occur on private property and therefore subject to Municipal requirements and other Provincial legislation.

Concerns were expressed through public submissions regarding water intake. Consideration of all information submitted by the applicant, feedback from other government Departments and Agencies indicate that the quantity of water required will support the proposed operation. The proposed operation uses a Recirculating Aquaculture System (RAS). It was noted that a water withdrawal permit was issued for this site the week of May 11, 2020. Concerns regarding the impact of water withdrawal on the surrounding community is within scope of the water withdrawal permit process.

Concerns were expressed through public submissions regarding effluent. In addition to the previously mentioned requirements, Kelly Cove Salmon Ltd. must adhere to requirements of the Environmental Monitoring Program, prior to operation, to ensure effluent is in compliance with Provincial and Federal regulations. The procedures, information and records related to adherence and implementation of the Environmental Monitoring Program must be referenced in the Farm Management Plan (FMP) for this licence.

Concerns were expressed through public submissions regarding the use of pesticides on AQ#1436. Pesticide products must be used according to product labels and following all health and safety requirements and all Federal and Provincial regulations.

Concerns were expressed through public submissions regarding Air and Noise Pollution. Kelly Cove Salmon Ltd. would be required to comply with any such related Municipal By-Laws and Provincial Laws related to air and noise pollution.

Kelly Cove Salmon Ltd. will be required to develop and implement an approved FMP, in accordance with the *Aquaculture Management Regulations* (AMRs), prior to becoming operational. The FMP program covers four main areas: fish health, containment, environmental management, and farm operations. The FMP for land-based finfish aquaculture operations include (but are not limited to) minimum compliance requirements related to production planning, inventory control, facility design specifications, storage of supplies and refuse, maintaining the site in good order, noise, and record-keeping. This FMP will be reviewed by Department staff for approval. Additional information on the Minimum Compliance Points for FMPs can currently be found at: <https://novascotia.ca/fish/documents/compliance-documents/Minimum-compliance-requirements-Landbased.pdf>

Furthermore, the information reviewed suggests that the proposed operation will be in compliance with the Act, relevant regulations, policies and guidelines of the Department. The *Aquaculture Licence and Lease Regulations* allow for the Administrator to consider any other factor the Administrator considers relevant to the application. The requirement for Kelly Cove Salmon Ltd. to implement an approved FMP and the roles of other Government Departments and Agencies in issuing approvals for non-aquaculture elements of the operation were also considered.

Consideration of all information submitted by the applicant, feedback from other government Departments and Agencies, and submissions from the public, the proposed operation of AQ#1436 demonstrates both financial and technical viability.

## **5. Decision**

Based on the considerations above, Aquaculture Licence #1436 shall be issued to Kelly Cove Salmon Ltd. for a period of 10 years (March 11, 2021 to March 10, 2031).

The Licence documents shall be prepared in accordance with the standard operating documents of NSDFA and shall be made publicly available subject to the provisions of the *Freedom of Information and Protection of Privacy Act*.



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**Robert Ceschiutti,**  
**Aquaculture Administrator**  
**Nova Scotia Department of Fisheries and Aquaculture**

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**March 11, 2021**  
**Date**

## Ceschiutti, Robert

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**From:** A Daniels [REDACTED]  
**Sent:** January 15, 2021 10:17 AM  
**To:** Aquaculture Administrator  
**Cc:** Diane & Bart Daniels  
**Subject:** Comment on Kelly Cove Salmon Ltd's application AQ#1436

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

\*\* EXTERNAL EMAIL / COURRIEL EXTERNE \*\*

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Dear Sir or Madame,

I have reviewed the Nova Scotia Department of Fisheries and Aquaculture invitation to provide written comment on Kelly Cove Salmon Ltd.'s application for a new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County. My name is Adriane Daniels. I live at [REDACTED] in Centreville, Digby County, Nova Scotia. My Email address is [REDACTED] My telephone number is [REDACTED]

My husband and I have extensive experience raising koi carpers and are familiar with the challenges of raising fish from egg through to the adult stages. Our primary concerns with the plant are the expected volumes of water that are required to keep the fish healthy. We expect they would require fresh water on a continuous basis. What are the volumes of water that they will be using per day? Can the amount of ground water that exists at that location support such an undergoing without negatively impacting the water levels in Centreville? Of course so much water used will also result in as much water sewage. How will this be treated and where will the treated water end up? How much medicine and what types is expected to be used per year that will eventually end up in the sewage? What used medicines will not be broken down the treatments of the sewage and where will this end up? What is the expected level of air pollution (smells of the fish as well as the factory and treatment process)? And what is the expected noise pollution from the plant processes? Will there be excessive noise 24 hours per day?

We hope these questions will be addressed prior to a decision being made and that the health of the Centreville community will be considered in addition to the livelihood of the community.

We look forward to hearing from you.

Thank you and regards,  
Adriane Daniels and Bart Visscher



Via Email

January 21, 2021

Honourable Keith Colwell  
Department of Fisheries and Aquaculture  
6th Floor (Suite 605), WTCC  
1800 Argyle Street, Halifax, Nova Scotia  
B3J 3N8

Dear Minister Colwell,

We are pleased to write to you today to indicate our support for Cooke Aquaculture's proposed Kelly Cove Salmon Ltd. project in Centreville, Nova Scotia. As the largest accredited business organization of influence in Atlantic Canada including our 31 chambers of commerce who represent more than 5,200 businesses in Nova Scotia, we actively advocate for the development of sustainable businesses which provide jobs and economic growth in communities across our region.

Since 2012, Cooke has invested significantly in their operations in Nova Scotia, including capital infrastructure on marine farms, freshwater hatcheries, major expansions at both their feed manufacturing facilities in Truro, their seafood distribution facility in Dartmouth, in research & development projects, and community and student initiatives.

In Nova Scotia, Cooke Aquaculture employs a wide range of fields and specialties and has contributed significantly to the Nova Scotia economy. Cooke directly employs 205 Nova Scotians full time and year-round. Additionally, Cooke's Nova Scotia operations currently enable 240 indirect and induced jobs throughout the province in the local supply of goods and services and additional spinoff which creates jobs in skilled trades, retail, accommodations, and transport.

The Centreville post-smolt facility is a recirculating aquaculture system engineered to have capacity to grow 3M salmon and will provide a supply of large salmon smolt NS marine farms. Increasing the size of smolt grown on land requires more growing space. Benefits are fewer days in seawater, thereby improving overall farming efficiency. This type of hybrid salmon farming model is recognized globally as a sustainable best marine farming practice to support fish health and to produce top quality fish. This new facility helps to reduce fish handling, reduce time at sea and reduce days to market using world-leading aquaculture innovations and technology.

As the global population and demand for safe and nutritious protein continues to grow, Nova Scotia is positioned to continue to provide safe and sustainable fish farming in the fastest growing food production sector in the world. The project is estimated to create 453 full-time equivalent construction jobs, 82 indirect jobs for local suppliers, and 101 additional jobs in the hospitality and restaurant sector.

Our members recognize that Nova Scotia is fortunate to have an abundance of resources and a beautiful natural environment. These attributes provide our citizens with an enviable quality of life and a variety of commercial opportunities, both of which must be protected through sustainable business practices.

We are confident in the regulatory framework that the aquaculture industry follows to ensure safe, environmentally friendly, and sustainable fish farming. On behalf of our members, we submit our views respectfully in the hopes your department will consider expanding aquaculture operations as a promising opportunity both economically and socially for Nova Scotia.

Cordially,

Sheri Somerville  
CEO | Atlantic Chamber of Commerce

Cc: Robert Ceschiutti

The attached records were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse, and is not responsible for, the content of the attached records, including, but not limited to, the accuracy, reliability, or currency of the information contained in the attached records.



Shelburne, N.S.

Phone:

[www.town.shelburne.ns.ca](http://www.town.shelburne.ns.ca)

27 January 2021

Nova Scotia Department of Fisheries and Aquaculture  
Attn: Aquaculture Administrator  
1575 Lake Road  
Shelburne, Nova Scotia  
B0T 1W0

**RE: KELLY COVE SALMON LTD. APPLICATION FOR A NEW LAND-BASED AQUACULTURE LICENSE (AQ#1436) IN CENTREVILLE, DIGBY COUNTY**

Dear Aquaculture Administrator:

Over the past few years, we have witnessed Kelly Cove Salmon Limited and its parent company, Cooke Aquaculture Incorporated, invest heavily in our community through a variety of undertakings that are part of their sustainable, 'grow responsibly' business operations. In particular, Shelburne is a direct benefactor of the saltwater farming activities.

***The Town of Shelburne fully supports the application by Kelly Cove Salmon Limited for a new land-based aquaculture license in Centreville, Digby.***

Kelly Cove Salmon Ltd. is vital to the continued success of our community in that it not only utilizes the town-owned pier as part of their operations but also directly provides employment for citizens of our Town but also around the province. Allowing this new land-based facility in Centreville, Digby, will have a positive ripple effect for many Nova Scotia communities besides Shelburne and an incredible economic impact for Nova Scotia as a whole.

We urge the Nova Scotia Department of Fisheries and Aquaculture to approve the license application and in a timely manner.

On behalf of our Town Council, thanking you for your consideration.

Respectfully Submitted,

**TOWN OF SHELburne**

  
Harold Locke  
Mayor

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Aquaculture Administrator  
NS Dept of Fisheries and Aquaculture  
1575 Lake Road, Shelburne, NS  
BOT 1W0

Re: Support for Land-based Post-Smolt Facility – Centerville, NS (AQ#1436)

Dear Minister Keith Colwell:

Kelly Cove Salmon Ltd (KCS), has been a client of the Digby Harbour Port Association (DHPA) for 12 years. We have had a long relationship of cooperatively planning for the operation of the Port of Digby, and working on safety and efficiencies at the Port of Digby. KCS has been exemplary in their approach to Occupational Health and Safety, operations and logistics, and animal husbandry. KCS's presence in Digby is a significant contributor to employment and the regional economy.

The state of the art land-based post-smolt facility proposed for Centerville, NS will further advance the production of farmed fish in Atlantic Canada. This hybrid solution, that raises fish to a post-smolt stage before finishing the fish in an at-sea pen, is progressive in the maintenance and monitoring of aquaculture production. Construction facility and economic impact will generate \$83M regionally. Establishing the post-smolt hatchery in Centerville will have immense long range benefits locally. Operational employment and economic spinoffs combined with the increased municipal tax base will help stabilize the area. Having a state of the art hatchery and post-smolt facility in Centerville will provide production security to the aquaculture sector in Atlantic Canada.

The Digby Harbour Port Association supports and encourages the establishment of the proposed Land-based Aquaculture Licence (AQ#1436) in Centerville, NS by the proponent Kelly Cove Salmon.

Sincerely,

Edwin Chisholm  
CEO Digby Harbour Port Association

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January 29, 2021

Aquaculture Administrator  
Nova Scotia Department of Fisheries and Aquaculture  
1575 Lake Road  
Shelburne, Nova Scotia  
BOT 1W0

Dear Aquaculture Administrator,

**RE: Kelly Cove Salmon Ltd.'s Application for a New Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County – Letter of Support**

Bay Ferries Limited, incorporated in 1997, provides year-round ferry service between New Brunswick and Nova Scotia using the MV Fundy Rose. In 2016, Bay Ferries also reintroduced seasonal high-speed ferry service between Maine and Nova Scotia – and the return of The CAT (Bay Ferries previously offered such service between 1998 and 2009).

The MV Fundy Rose is a necessary and important part of Canada's critical infrastructure and the transportation industry, servicing the regular users of its daily, year-round service and the demanding and essential trucking industry which uses this route to deliver products between South West Nova Scotia, Southern New Brunswick, and exports into the United States. We employ approximately 120 people in Nova Scotia and New Brunswick.

Over the past 20 years key elements of our commercial business out of South West Nova Scotia have changed significantly as many companies and industries (pulp and paper, lumber, logs, woodchips) have endured change or shut down. In contrast, the seafood industry remains a key backbone of our service.

Bay Ferries Limited has enjoyed a strong working relationship with Cooke Aquaculture and its subsidiaries (including Kelly Cove Salmon Ltd.) since 1998 when they first entered Nova Scotia. Shoreland Transport, Cooke Aquaculture's transport company, is one of Bay Ferries Limited's top five commercial accounts and is active year-round. Employees of Cooke Aquaculture regularly cross on Fundy Rose with their vehicles to work in their Nova Scotia-based operations in Brier Island, Shelburne, Liverpool, and at Rattling Beach which is directly adjacent to our Digby ferry terminal.

Kelly Cove Salmon Ltd.'s proposal for a new \$56.8 million land-based post-smolt facility in Centreville, Nova Scotia, would bring significant construction jobs and full-time operational jobs to the Town of Digby, Digby County, and South West Nova Scotia, a significant economic boost to those areas. As well, Fundy Rose would experience related increases in commercial vehicle traffic and passenger/passenger vehicle traffic during the construction phase of the project and also over the longer-term once the facility begins operations.

Reply to:

████████████████████  
**HALIFAX NS CANADA**  
████████████████████



████████████████████  
**CHARLOTTETOWN PE CANADA**  
████████████████████

The attached records were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse, and is not responsible for, the accuracy, reliability, or content of the information contained in the attached records.

Bay Ferries Limited applauds Cooke Aquaculture for its innovation, determination, and commitment to aquaculture in Nova Scotia.

We are pleased to support Kelly Cove Salmon's application for a new land-based Aquaculture Licence (AQ#1436) in Centerville, Digby County, Nova Scotia.

Please contact me if you have any questions.

Sincerely,



Jim Wilson  
Vice President and General Manager

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CANADIAN  
MANUFACTURERS  
& EXPORTERS



MANUFACTURIERS  
& EXPORTATEURS  
DU CANADA

Department of Fisheries and Aquaculture  
6<sup>th</sup> Floor (Suite 605), WTCC  
1800 Argyle Street  
Halifax, Nova Scotia  
B3J 3N8

February 3, 2021

**RE: Canadian Manufacturers & Exporters letter of support on Kelly Cove Salmon Ltd.'s application for a new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County.**

Dear Minister Colwell,

On behalf of Canadian Manufacturers & Exporters and the more than 1700 Nova Scotia manufacturers in the province, I would like to take this opportunity to submit a letter of support for the proposed Kelly Cove Salmon Ltd.'s new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County.

Kelly Cove Salmon Ltd., the Atlantic Canadian salmon farming division of family-owned Cooke Aquaculture Inc. has applied to the Nova Scotia Department of Fisheries and Aquaculture for the approval of a new land-based post-smolt facility in Centreville, Digby County. Kelly Cove Salmon has been sustainably operating feed manufacturing, freshwater hatcheries, saltwater farming sites, a remote feeding centre and seafood distribution facilities for over twenty-three combined years in Nova Scotia.

Canadian Manufacturers & Exporters has reviewed the project outlined and projected economic impacts (compiled in partnership with Atlantic Provinces Economic Council (APEC)), and found this to be a great opportunity for the province. In 2020, CME completed a management survey in the midst of the Covid-19 Pandemic to determine how the sector is navigating these unprecedented times, and identify how we can better position ourselves to come out of this situation in stronger.

The following are some key points that were identified, and in our opinion, mirror some of the strengths that proposed Kelly Cove Salmon Ltd.'s project would address.

**Food and Agri-Food security needs to be further developed in Canada**

This project will help increase food production and security for Canada and global markets

**Increase economic growth and prosperity in Nova Scotia by expanding into global markets**

- Positive business impacts to trucking and ferry service. Cooke's activities were one of the single largest users of the Digby-Saint John ferry in 2020
- The multi-year construction project is projected to create approximately \$83.3M of capital expenditures, \$52.5M GDP (Gross Domestic Product), and \$27.7M of new consumer spending

The attached reports were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse, and is not responsible for, the content of the attached records, including but not limited to, the accuracy, reliability, timeliness, or currency of the information contained in the attached records.



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& EXPORTATEURS  
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**Canada's need to increase innovation and technological adaptation in key sectors (considering sustainable practices and environmental performance)**

- This construction project would be a world-class recirculating aquaculture system (RAS) investment

**Expand the manufacturing workforce through increased opportunities and good paying jobs**

- The construction project will create 636 jobs, \$36.9M of employment income (payroll/wages), \$13.2M in taxation
- The operation will require approximately 16 new full-time, year-round Kelly Cove Salmon positions and another 18 indirect and induced jobs

**Environmental Impact Considerations**

- Based on information provided, environmental practices have already been considered for the Centreville project, a given the green light by the Department of Fisheries and Oceans (DFO) reporting it poses very low risk to the ocean environment including lobster and other aquatic species. This is critical in ensuring no risk to the vibrant lobster and other seafood industries in the area

In closing, Canadian Manufacturers & Exporters strongly supports the proposed Kelly Cove Salmon Ltd.'s new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County based on the many benefits noted in proposal.

If you have any questions regarding this support letter, please do not hesitate to contact me.

Best Regards,

Michel Raymond  
Vice President, Nova Scotia  
Canadian Manufacturers & Exporters

[Redacted contact information]

**Distribution:**

- Hon. Keith Colwell, Minister of Agriculture and Minister of Fisheries and Aquaculture
- Hon. Geoff MacLellan, Minister of Business and Trade
- Cc: Joel Richardson, Vice President Public Relations, Cooke Aquaculture Inc.

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February 4, 2021

Gerry Lutes  
Executive Manager & Secretary-Treasurer  
ANAC (Animal Nutrition Association of Canada) Atlantic

[REDACTED]  
Berry Mills, NB,  
[REDACTED]

Aquaculture Administrator  
Nova Scotia Department of Fisheries and Aquaculture  
1575 Lake Road, Shelburne, NS B0T 1W0

Dear Sir/Madam

The Animal Nutrition Association of Canada (ANAC) is a national trade association for Canada's Feed industry. ANAC advocates on behalf of the industry with government regulators and policy-makers, to foster a favourable business environment for its members. The Atlantic Division of ANAC is an extension of the national organization. We strongly support the growth of a regulated feed industry in Atlantic Canada.

Kelly Cove Salmon Ltd. (KCS) has submitted a new aquaculture application AQ#1436 for the land-based cultivation of Atlantic salmon. The proposed activity is planned to occur on Private Land at PID#30165625, which is located in Centreville, Digby County. This project involves the development of a land-based facility that represents all freshwater stages of production. The facility will have four independent modules for different stages of production: Egg incubation modules, First feeding modules, Parr modules and Smolt modules. These smolt will be transferred to KCS marine aquaculture sites.

The feed for this operation will be supplied by an ANAC member in Atlantic Canada, thus growing the volume of business generated and providing additional employment. We therefore strongly support the approval of this application.

Sincerely

Gerry Lutes  
Executive Manager & Secretary-Treasurer  
ANAC (Animal Nutrition Association of Canada) Atlantic

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Halifax, Nova Scotia

January 25, 2021

To: Robert Ceschiutti, Aquaculture Administer  
Nova Scotia Department of Fisheries and Aquaculture  
1575 Lake Rd.  
Shelburne, NS, B0T 1W0

From: Tom Smith, Executive Director  
Aquaculture Association of Nova Scotia

Re: AANS Letter of Support: Kelly Cove Salmon Ltd.'s application for a new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County.

Dear Robert,

Kelly Cove Salmon Ltd., the Atlantic Canadian salmon farming division of family-owned Cooke Aquaculture Inc. from Blacks Harbour, New Brunswick, has applied to the Nova Scotia Department of Fisheries and Aquaculture for the approval of a new land-based post-smolt facility in Centreville, Digby County.

The Aquaculture Association of Nova Scotia fully supports this project. The proposed Centreville project will be a positive development for Nova Scotia aquaculture industry's development in our province and will provide substantial long-term economic and social benefits to Nova Scotia. It is estimated that this activity would create approximately 453 full-time equivalent construction jobs, and 82 indirect jobs (local suppliers) and 101 induced jobs (support services such as local accommodations, restaurants, etc.) in The Town of Digby, Digby County and NS. The total construction impact is very significant - \$83.3M of capital expenditures, \$52.5M GDP (Gross Domestic Product), 636 jobs, \$36.9M of employment income (payroll/wages), \$13.2M in taxation and \$27.7M of new consumer spending.

Kelly Cove Salmon has been sustainably operating feed manufacturing, freshwater hatcheries, saltwater farming sites, a remote feeding centre and seafood distribution facilities for over twenty-three combined years in Nova Scotia. The proposed Centreville project has already been given the green light by the Department of Fisheries and Oceans (DFO) reporting it poses very low risk to the ocean environment including lobster and other aquatic species.

The Aquaculture Association of Nova Scotia represents over 150 member organizations in Nova





Halifax, Nova Scotia

Scotia. Kelly Cove Salmon has been a long-term member of the AANS and have supported the responsible and sustainable growth of the aquaculture sector in Nova Scotia for more than 30 years.

The Aquaculture Association of Nova Scotia is pleased to provide this letter of support for Kelly Cove Salmon Ltd.'s application for a new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County.

Yours Truly.

Tom Smith, Executive Director  
Aquaculture Association of Nova Scotia

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# MUNICIPALITY OF DIGBY

DIGBY

NOVA SCOTIA

February 9, 2021

Nova Scotia Department of Fisheries and Aquaculture  
Attn: Aquaculture Administrator  
1575 Lake Road  
Shelburne, NS  
BOT 1W0

Re: KELLY COVE SALMON LTD. APPLICATION FOR A NEW LAND-BASED AQUACULTURE LICENSE (AQ#1436) IN CENTREVILLE, DIGBY COUNTY

Dear Aquaculture Administrator,

The council of the Municipality of the District of Digby would like to take this opportunity to express our support for Kelly Cove Salmon's application for a land-based aquaculture license. Kelly Cove Salmon has been working in the Digby area for years and the site for the new land-based license in Centreville is located in the Municipality of Digby.

Kelly Cove Salmon's contribution to the local economy over the years has been significant and an operation like the proposed land-based facility will not only provide local economic benefits, it will benefit the entire region.

On behalf of Municipal council, I thank you for the opportunity to express Council's support for this application.

Sincerely,

  
Linda Gregory  
Warden

Municipality of Digby

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February 10, 2021

Gwen Wilson

[REDACTED]  
Sandy Cove, Digby County  
[REDACTED]

Aquaculture Administrator  
Nova Scotia Department of Fisheries and Aquaculture  
1575 Lake Road  
Shelburne, NS B0T 1W0

**Submission for Public Comment in reference to Kelly Cove Salmon Ltd.'s application for a new Land-based Aquaculture Licence (AQ#1436) in Centreville, Digby County.**

**As a member of the group, St. Mary's Bay Protectors (SMBP), this application is of interest as the proposal represents an expansion of the current operation by Kelly Cove Salmon (Cooke Aquaculture) in our area.**

In 2019 St. Mary's Bay Protectors was organized to oppose the addition of new fin fish Aquaculture sites in the Bay as proposed by Cermaq. Following engagement with the local community, including representatives from the fishing community, by both Cermaq and the SMBP, it was clear that this industry was not wanted. At its Meeting in December, 2019 the Municipality of Digby Council passed a Resolution opposing any further expansion of open net fish farming in St. Mary's Bay, attended by approximately 200 constituents, including many local fishers.

**St. Mary's Bay supports a number of activities. Although lobster fishing is the primary commercial use, local tourism also takes advantage of these waters.**

In addition to the lobster fishery used both by commercial and indigenous fishers, the Bay supports a large quahog industry. There is commercial fishing in the Bay year round. There are plans for further development of both oyster and trout Aquaculture as well. There are whale watching businesses as well.

The Bay is enjoyed by many area residents for recreation; swimming, sailing, sport fishing, and whale watching.

**The plans for the proposed hatchery indicate the inclusion of a treatment plant. Effluent from this treatment plant will be discharged into the Bay. This has the potential to negatively affect the oceanographic and biophysical characteristics of the Bay and its habitats.**

Without details as to how this treatment facility will address the issue of both solid waste and liquid effluent, there are concerns that harmful substances will end up in the waters of the Bay. It is known that hatcheries have outbreaks of Infectious Salmon Anemia requiring the use of antibiotics and vaccines, which, along with any other chemicals used, would be in any effluent discharged into the Bay. Given the amount of solid waste from three million fish, which would equal the amount from approximately 300,000 people annually, effluent and loaded nitrate waters from such a hatchery, there would be enormous concern over potential contamination of people's drinking water, property values and community health.

In addition to the concerns noted above, the discharge of the effluent could have a negative impact on other fishing activities in the Bay. It poses a threat to the natural ecosystem of the Bay which is a crucial lobster nursery. There are also three other aquaculture projects and licenses for shellfish currently in St. Mary's Bay, including an ongoing experimental Oyster site currently run by Bear River First Nation, and two other leases, one for Scallops and the other for Quo Hog harvesting lease in the upper Bay.

The proposal indicates that large amounts of fresh water will be required as part of ongoing operations.

There are concerns about the amount of fresh water that will be drawn from the local aquifer which supports homes and businesses in the Centreville area. Without information to indicate how much and at what rate fresh water would be withdrawn, there are concerns that neighbouring properties and the wider community water table could be adversely affected.

These are important issues of water usage, water table impacts, effluents and solid waste: environmental issues which could negatively impact on communities drinking water, public health and broader issues of waste contamination and removal.

**The diagrams attached with the project proposal also indicate the construction of a significant wharf, which raises the issue of how might that impact on nearby lobster sites and public navigation.**

Given that the proposal does not provide specific details as to the size of the proposed wharf it is difficult to ascertain what the actual impact to both public and commercial traffic in the Bay may be affected.

**The proposal does not reference the contribution of the proposed operation to community and Provincial economic development.**

Cooke (Kelly Cove Salmon) has been quoted in various media referring to as many as 450 short term jobs during the construction phase and potentially 16 permanent jobs.

No guarantee or assurance has been given that these jobs would be filled by local workers it is more likely that Cooke (Kelly Cove Salmon) will bring in their own experienced workers from other sites? Good paying jobs are readily available in the lobster industry, which any expansion of marine based fish farming threatens.

To be absolutely clear, SMBP has not stated opposition to land-based sustainable fish farming nor to aquaculture projects involving oysters or scallops. To be absolutely clear, SMBP supports the lucrative lobster and fishing industries (\$900 million), the 4000 jobs that are part of that, and the safe uncontaminated drinking water that communities depend upon.

In closing, the proposal provided for public comment is sorely lacking in detail. While it is understood that these details are not required to be included when the proposed facility is on private land, as it affects the public in the ways noted above, much more information should have been a required part of this proposal.

Gwen Wilson  
St. Mary's Bay Protectors

The attached records were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not endorse and is not responsible for, the content of the attached records, including, but not limited to, the accuracy, reliability, or currency of the information contained in the attached records.

# TOWN OF DIGBY

DIGBY

NOVA SCOTIA

February 3, 2021

Nova Scotia Development of Fisheries and Aquaculture  
Attn: Aquaculture Administrator  
1575 Lake Road  
Shelburne, NS  
BOT 1W0

**RE: KELLY COVE SALMON LTD. APPLICATION FOR A NEW LAND-BASED AQUACULTURE LICENSE (AQ#1436) IN CENTREVILLE, DIGBY COUNTY**

Dear Aquaculture Administrator;

Over the past number of years Kelly Cove Salmon Ltd and it's parent company Cooke Aquaculture Incorporated have been doing business within the Town of Digby and surrounding community. Their "grow responsibly" business operation here has contributed significantly to our local economy. The Council of the Town of Digby fully supports Kelly Cove Salmon Limited's for a new land based aquaculture license in Centreville Digby County. Kelly Cove Salmon Limited's contribution to our local economy is vital to the sustaintainability of our communities through employment and spin off contributions, we believe that this new land- based facility in Centreville, would provide a positive ripple effect to not only our local economy but have a positive impact to the entire Nova Scotia economy. On behalf of Town Council, I thank you for given the opportunity to express Council's support for this application.

Your truly;

  
Ben Cleveland, Mayor  
Town of Digby

Received

05 FEB 2021

Fisheries and Aquaculture  
Shelburne, NS

The attached records were submitted by this party to the Department of Fisheries and Aquaculture as a part of a public submission process. This Department does not endorse, and is not responsible for, the content of the attached records, including but not limited to, the accuracy, reliability, or currency of the information contained in the attached records.



## Healthy Bays Network

Antigonish, NS

Website: healthybays.ca

E-Mail:

Phone:

February 10, 2021

Robert Ceschiutti, Aquaculture Administrator  
Nova Scotia Department of Fisheries and Aquaculture  
1575 Lake Road  
Shelburne, NS B0T 1W0

By email: [robert.ceschiutti@novascotia.ca](mailto:robert.ceschiutti@novascotia.ca)

RE: Proposed Aquaculture Licence (AQ#1436)

Dear Mr. Ceschiutti:

The Healthy Bays Network (HBN) is writing in response to your invitation to members of the public to provide written comment on Kelly Cove Salmon Ltd.'s application for a new, 10 year, Land-based Aquaculture Licence (AQ#1436) near Centreville, NS, Digby County.

HBN is a conservation stewardship coalition, registered with NS Joint Stocks, and representing 8 community-based organizations from around the province including those on St. Mary's Bay. The Network is concerned about maintaining the ecological integrity of coastal marine ecosystems in support of their inherent value and the long-term sustainability of our coastal communities and local fisheries. We feel we are a legitimate voice in relation to the matter at hand as we have concerns about the extent of marine pollution in St Mary's Bay that could result from this operation. The fact that fish reared in this facility will supply open net-pen farms throughout Nova Scotia in communities where we live, including existing sites and potential new sites, compounds the potential environmental impacts of this application.

We note that the instructions to submitters say, if the decision involves a land-based operation, submissions from the public must deal with one or more factors as set out in Section 43 of the Aquaculture Licence and Lease Regulations.

Factors the Administrator may take into consideration include:

- (a) the financial viability of the proponent and the proposed operation;
- (b) the extent to which the proposal is in accordance with the Act, the relevant regulations made under the Act and any guidelines or policies established by the Minister;
- (c) the technical viability of the proposed operation;
- (d) any factors that the Administrator considers relevant to the application



## Healthy Bays Network

Antigonish, NS

Website: healthybays.ca

E-Mail:

Phone:

Our first concern is about **this process**:

The information provided in the Notice for public comment and review is **insufficient to support even the most rudimentary assessment by anyone interested in the new facility let alone technical or financial viability**. The information made public includes a short descriptive paragraph which is half promotional in nature with **no information regarding the scope or scale of the proposed facility/operation**, information fundamental to any assessment of viability, financial or technical.

We note, there was some information of relevance reported by CBC via an interview with Cooke Aquaculture on January 13, 2021, the day before this government notice was posted: "Cooke Aquaculture proposes \$58M salmon hatchery on Digby Neck". The item reported that the facility is expected to produce 3 million fish per year and supply 13 fish farms. Why does the government not provide such baseline information of a non-proprietary nature? We should not have to rely upon the media for such basic "tombstone" information regarding use of our public waters.

Additional information provided in the Notice consisting of two maps of the location and three architectural, computer-generated renderings ("site aerial") gives in broad strokes a sense of the scale envisioned and the infrastructure to be constructed. The graphic shows four wells while the text cites five to supply freshwater for the hatchery. A wharf is depicted but no sign of an effluent pipe into St. Mary's Bay. The new, post-smolt technology may well result in a reduction in marine pollution from farms in Nova Scotia as claimed, but the information provided does not permit even a preliminary assessment of possible benefits when constructed.

Our second major point relates to Section 43 (b), "the extent to which the proposal is in **accordance with the Act, regulations made under the Act and any guidelines policies established by the Minister.**"

In Section 2 of the Act, two fundamental purposes for the legislation are to "(e) expand recreational and sport fishing opportunities and ecotourism and, (f) foster community involvement in the management of coastal resources." Without getting in to the issue of possible negative effects on tourism nor on sport fishing for wild salmon populations arguably affected by fish farms, how can it be argued that giving the public, especially those directly impacted by this proposal, so little information in any way fosters community involvement? The Fisheries and Coastal Resources Act and Regulations do not require the release of application information to the public. However, one of the purposes of the Act is "to ensure that members of the public have access to information with respect to the regulatory process. (FCRA Section 34A)." East Coast Environmental Law, Aquaculture and Public Engagement, Winter 2021.

The third major concern we would like to register involves the **potential marine pollution** that will be piped into St. Mary's Bay from this hatchery operation. As mentioned above, the information given to the public does not include any specifications of the scope or scale of the operation (how much, how often) so it is not possible to estimate the possible impact of the pollution that will result nor its impact on the marine environment and, in particular, on the economically significant lobster fishery.



## Healthy Bays Network

Antigonish, NS

Website: healthybays.ca

E-Mail:

Phone:

However, we do know that there will be effluent, that it will be treated somehow (not described), and that it may still contain pesticides, antibiotics and other chemicals that may or may not be used in the rearing of salmon smolts. Academic articles and industry literature both abound with information regarding aqua drugs and chemicals including antibiotics commonly used in hatcheries, but this proposal is completely silent on this aspect.

We note that the Brier Island/Digby Neck area of St. Mary's Bay further to the southwest of the proposed hatchery has been identified by DFO as a potential Marine Protected Area due to its significant marine mammal (whales) and bird diversity and is a high priority for protection because of high benthic diversity. Further, St. Mary's Bay in its entirety has been identified as a potential Ecologically and Biologically Significant Area (EBSA) due to the presence of 19 Species at Risk including Atlantic Salmon, Atlantic Cod, Piping Plovers and Beluga and Blue Whales. The Assembly of First Nations Mi'kmaq Chiefs expressed concern in 2011 regarding proposed aquaculture facilities in St Mary's Bay citing the decline of wild Atlantic Salmon populations and poor returns of grilse that spend time in the ocean before returning to their native spawning rivers (Identification and Review of Ecologically and Biologically Significant Areas in the Bay of Fundy, M-I Buzeta, Canadian Science Secretariat Research document 2013/065).

This hatchery is aggressively dependent on water sources and will generate effluent. These will have a bearing on the technical and financial viability of the project as negative impacts on the environment and fish habitat come with costs and serious engineering challenges. Until the proponent can demonstrate that they can meet these challenges by obtaining the necessary approvals and completion of impact assessments, then this project can demonstrate neither its technical nor its financial viability. The government must invoke the precautionary principle and put the onus on the proponent to demonstrate no adverse affects and viability before approvals can be made.

In conclusion, we would like to acknowledge that we are fully aware that some concerns outlined in this submission go beyond the strict confines of this NSDFA licence approval process and that we have registered concerns pertaining to other provincial departments and federal government reviewers (DFO, ECCC). However, all our concerns do definitely go hand in hand with serious questions around the proposed project's technical and financial viability, and whether it conforms to the Act itself. The current regulatory framework governing marine aquaculture under the auspices of the Canada-Nova Scotia MOU on Aquaculture Development leaves little opportunity for public participation in regulatory approval processes for land-based hatcheries involving the discharge of marine effluent due to the fact that these approval processes are sequential, discrete and involve multiple levels of government. As we see it, this is the sole opportunity to register our concerns in the complicated chain of approvals for this facility.



# A.F. Theriault & Son Ltd.

Quality Boats Since 1938

██████████ Meteghan River, Nova Scotia, ██████████ CANADA  
Phone: ██████████ Fax: ██████████ Web: www.aftheriaultboatyard.com

Stephane LeBlanc  
██████████

Meteghan River, Nova Scotia; ██████████  
██████████

February 12<sup>th</sup>, 2021

**Re: Kelly Cove Salmon Application for a New Land-Based Aquaculture License (AQ#1436)**

To Nova Scotia Department of Fisheries and Aquaculture,

My name is Stephane LeBlanc and I'm writing to you on behalf of A.F. Theriault & Son Ltd. (AFT) for which I am employed as the Marine Superintendent. I've been in the position of Marine Superintendent since June 2016 and have been employed at AFT since December 2012. For over twenty years now, AFT and Kelly Cove Salmon (KCS) have developed a business relationship that has benefited both parties tremendously. As KCS has grown their business in Nova Scotia and Atlantic Canada, AFT has been able to grow alongside. Case in point for this is the construction of a new state-of-the-art 1,500 marine railway which we completed construction on in April 2019. Our relationship with KCS was a large contributing factor in our decision to invest into new infrastructure for our Company. KCS has always been supportive of our growth as a Company and we, in turn, the same.

Therefore, please view this letter as one of support for KCS' application for a new land-based aquaculture license. The proposed post-smolt facility is a step in the right direction to a more hybrid land/ocean model for salmon farming. Growing the salmon for longer periods on land will mitigate some of the risks of growing these in the ocean and create a more environmentally sustainable future for the industry. We, at AFT, are far from experts in the salmon farming (aquaculture) industry. However, we've been gaining experience and expertise in the processes and systems used by KCS to create a sustainable environment for the fish to grow and are always in awe of the ingenuity and innovation from KCS in this regard. We, undoubtedly, believe that this new facility will only improve KCS' ability to provide a great product and service to their Customers while sustaining our environment and ocean resources for the future.

KCS has always been a proponent for growth in rural coastal communities across Atlantic Canada. We've seen a decline in our region's population over the years and the current demographic needs improvement. We need to attract a younger generation to our region so we can not only sustain our communities but grow them for the benefit of everyone. KCS' commitment to this project shows a commitment to our communities which we largely need. Growing the business infrastructure in our region will benefit those directly in the industry, those directly adjacent to the industry (i.e. A.F. Theriault & Son Ltd. and others) and many not directly involved as the trickle-down effect will benefit many businesses and individuals in our region.

The attached records were submitted by third parties to the Department of Fisheries and Aquaculture as a part of a public submission process. The Department does not assume any responsibility for the accuracy, reliability, or currency of the information contained in the attached records.

We firmly believe that a project of this magnitude will bring positive outcomes for many in our region and our Province. We ask that our Government show their support in the development of our region by accepting KCS' application for this license. A.F. Theriault & Son Ltd. sincerely gives its support in the matter and will gladly help in any which way we can.

Regards,



**Stéphane LeBlanc**  
Marine Superintendent  
A.F. Theriault & Son Ltd.



**Gilles Theriault**  
Managing Director  
A.F. Theriault & Son Ltd.



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## Ceschiutti, Robert

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**From:** Carol Reed [REDACTED]  
**Sent:** February 12, 2021 11:56 PM  
**To:** Aquaculture Administrator  
**Subject:** AQ#1436 - Centreville, Digby County

**\*\* EXTERNAL EMAIL / COURRIEL EXTERNE \*\***

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

ATTENTION: Aquaculture Administrator

RE: Kelly Cove Salmon Proposed Land Based Facility - Centreville, Digby County

In order for the public to comment or understand what the impact of the proposed development might have to the surrounding environment and community it is imperative that basic information about a proposed operation is provided, however, there is little information provided with the application beyond the location and what the facility will look like. The absence of information, including what the basic operational system of the facility is, raised the following issues of concern:

- Are the facility's operations a flow-through system, or RAS ?
- has the water source supply testing been done and if so are the results available to the public
- has water quality testing of the water supply been done and if so will those tests be available to the public
- is there an environmental assessment for the development
- is there effluent discharged into the open ocean or surrounding lands,
- is the facility's proximity to the ocean vital, for discharge or other reason
- is there regular testing for ISA or other viruses at all stages, who monitors this
- is this facility to supply KSC sites in NS only or including other provinces or countries.
- how many net-pen sites would this facility supply based on its yearly production

Technical viability and sustainability? What type of facility is it? Is this facility a flow-through system operation or Recirculating Aquaculture System (RAS)? The facility is plainly referred to as a land based facility and labelled a 'Large Smolt Facility' on the applicant's plans. When Cooke's proposed a new hatchery for Bayside NB, the facility was widely publicized as an 'RAS Facility'. Described as having "the most advanced water recirculation technology on the market". However, there is no mention of RAS in the proposed Digby Hatchery application documents or public announcements. In contrast, when Cooke announced their proposed Bayside NB facility they boasted widely it would be "using the most modern recirculating aquaculture system technology available today" - Joel Richardson, [Fishfarmingexpert.com](http://Fishfarmingexpert.com), Feb.26, 2019. "We believe it will be the first facility to use this technology in Canada" - Joel Richardson, Salmonbusiness, Feb.25,2019. Simultaneously, in the same publicity Richardson criticized the Atlantic Salmon Federations (ASF's) use of flow-through systems.

Here in NS, Cooke is referring to the proposed Centreville development simply as a post-smolt facility or large smolt facility, there is no mention of RAS. So, will this be a flow-through operation, like they were critical of ASF using? If this is not an RAS facility then per Cooke's own words, we can only conclude that the Digby facility will NOT be operating with the most modern technology available. Is the company proposing sub-standard systems for Nova Scotia when they are proposing the 'latest most modern RAS technology in Canada' for the NB location?

As stated in the application itself, "open net-pens pose biological and environmental challenges like weather and disease outbreaks" - this is known, undisputed by those in the industry and the communities who suffer the

consequences of these disasters, but the industry has yet to prove they can solve these challenges and refuses to remove these **high risk low benefit operations** out of our waters. Considering what is at risk, the only approach should be a precautionary one and that means NO open net-pens in NS waters, and this includes all operational phases of their production cycle.

There is no suitable place for open net-pens in NS waters. As stated in the application, the proposed hatchery's primary purpose is to supply KCS marine cage sites, thus this facility is an extension of those operations. These are the same type of operations that are currently being phased out in BC by our Federal Government. In Nova Scotia, existing net-pen sites and all proposed expansion of finfish farms are largely opposed by the local communities, Municipal Officials and Chamber of Commerce businesses and therefore all the same concerns and opposition related to those marine sites extend to this facility which would support their ongoing operations. **For a viable and sustainable future, it is unimaginable why this facility is not being planned to be full-grow out, because otherwise all proposed economic benefit to the community or province is short sighted as world-wide this industry is transitioning to closed containment and land-based only. This transition is already happening now in B.C.**

As a resident of NS who understands the economic dependence of the Province on a healthy ocean for the Fisheries and Tourism industries I believe I have a right to speak my concerns on this topic. I am the owner of a property in a fishing community in close proximity to a KCS net-pen site and am directly effected by its operations. Kelly Cove Salmon (Cooke Aquaculture) is a NB based business, the fish are owned, processed and sold outside of NS and most all money goes back to NB - while their finfish farming operations pollute our local waters and put NS's most valued industries at risk.

I request that my concerns be acknowledged and considered in the review of this application.

Sincerely,

Carol Reed

██████████  
Brooklyn, NS, ██████████  
Community of Beach Meadows  
email: ██████████

t: ██████████