

# Decision on Application for a New Land-based Aquaculture Licence

## Application to the Administrator:

Pursuant to the Nova Scotia *Fisheries and Coastal Resources Act* (the “Act”) and the Nova Scotia *Aquaculture Licence and Lease Regulations* (the “Regulations”); On September 18, 2025, the Nova Scotia Department of Fisheries and Aquaculture (the “Department”) received an application for a new land-based aquaculture licence, file no. 1471 (AQ#1471), as described below:

## Application Summary:

<b>Type:</b> Land-based (facility)	<b>Location:</b> Lower Eel Brook, Yarmouth County
<b>File Number:</b> AQ#1471	<b>Species:</b> American oyster
<b>Applicant:</b> D'Eon Oyster Company Ltd.	<b>Proposed Term:</b> 10 year licence

## Consultations on Application to Administrator:

The application was sent for consultation to the following departments or agencies of the Government of Nova Scotia, pursuant to Clause 40(1)(a) of the Regulations:  
Environment & Climate Change, Agriculture, Communities Culture Tourism & Heritage (CCTH), Natural Resources, Public Works.

The application was sent for consultation to the following departments or agencies of the Government of Canada, pursuant to Clause 40(1)(b) of the Regulations:  
Fisheries & Oceans Canada (DFO), Canadian Food Inspection Agency (CFIA), Environment & Climate Change Canada (ECCC).

## Public Submissions on Application to Administrator:

Pursuant to Section 41 of the Regulations, notice of the application was published on the Department’s website and in the Royal Gazette Part I inviting the public to submit written comments on the application to the Administrator within the 30 days following the date the notice was published. This notice was published on September 25, 2025

Seven (7) submissions were received by the Department during the 30-day public comment period. All of the submissions received met the requirements set out in subsection 41(5) of the Regulations and are included with this document. It is noted that one or more of the submissions

were received in duplicate creating the appearance of more than 7 submissions, however, as a matter of clarity, submissions were received from a total of seven (7) members of the public.

**Factors to be Considered (as set out in Section 43 of the Regulations):**

*The financial viability of the proponent and the proposed operation*

In consideration of all information submitted by the applicant, feedback from other government Departments and Agencies, and submissions from the public, the proposed operation of the land-based facility demonstrates both financial and technical viability.

*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*

The nature in which the applicant intends to develop and operate this land-based site is consistent with the Act, Regulations, licence requirements, guidelines and policies of the Department.

If a licence is granted, the licensee will be required to develop and implement an approved Farm Management Plan (FMP), in accordance with the Nova Scotia *Aquaculture Management Regulations*, prior to becoming operational. The Farm Management Plan for land-based shellfish aquaculture operations include 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 Farm Management Plan will be reviewed by Department staff for approval. Additional information on the Minimum Compliance Points for Farm Management Plans can currently be found at:

<https://novascotia.ca/fish/documents/compliance-documents/Minimum-compliance-requirements-Landbased.pdf>

*The technical viability of the proposed operation*

Upon consideration of all information submitted by the applicant, feedback from other government Departments and Agencies, the applicant's proposal was determined to be technically viable. The technical information provided suggests that the proper infrastructure will be put in place for the proposed method and scale of operation.

*Any factors that the Administrator considers relevant to the application*

Concerns were raised by the public regarding the water discharge pipe from the proposed land-based facility. The federal *Aquaculture Activities Regulations* regulate the deposit of three classes of deleterious substances: drugs whose sale is permitted or otherwise authorized, or whose importation is not prohibited, under the *Food and Drugs Act*; pest control products that are registered, or whose use is authorized, under the *Pest Control Products Act*; and biochemical oxygen demanding matter. The deposit of deleterious substances other than those regulated by the *Aquaculture Activities Regulations* into waters frequented by fish is subject to general

prohibition under section 36 of the federal *Fisheries Act*, irrespective of the amounts or inherent toxicity of the substance.

The DFO assessed the residual risk posed by the release of chemicals, nutrients and biochemical oxygen demanding matter from the wastewater discharge pipe as low risk to fish and fish habitat, including species under the federal *Species at Risk Act*. The DFO also determined that no prohibited effects on species listed under the *Species at Risk Act* are likely to occur. The DFO also provided the applicant with a list of recommendations to mitigate the potential for prohibited effects to fish and fish habitat, should a licence be granted.

**Decision:**

Based on the factors considered above, the application for a new land-based aquaculture licence is hereby approved. As a result, aquaculture licence no. 1471 shall be issued to D'Eon Oyster Company Ltd. for a term of ten (10) years (October 28, 2025 to October 27, 2035). Documents shall be prepared in accordance with the Department's standard operating documents and shall be made publicly available subject to the provisions of the *Freedom of Information and Protection of Privacy Act*.

A handwritten signature in blue ink that reads "Rob Ceschiutti".

Robert Ceschiutti  
Aquaculture Administrator  
Nova Scotia Department of Fisheries and Aquaculture

October 27, 2025

Date

Submission ID	First name	Last name	City/Town/Community	Comments
6040c105	Dale	Pothier	Yarmouth Co.	<p>It's difficult to comment on this lease as the scale of the tank has been redacted on the lease application and the measurements of the nursery have been redacted also. The raw brackish water being pumped from Eel Lake filtered by the oysters and drained back into the lake could contain spat that will end up in Eel Lake causing future Biofouling unless the water being drain back into the lake doesn't contain any spat? Could I have this information clarified please? Again I stress that the capacity and size of the nursery has been redacted which makes the public unaware of the size of productivity of this nursery. It's impossible to know how much spat will get drained into Eel Lake without knowing how many oysters the nursery can contain. Even the pump capacity has been redacted of how much water will be pumped over a 24 hr period. In regards to the public using the lake for boating kayaking fishing etc. Will this nursery affect the public use of the lake or will boaters not be affected by this nursery? Will the water be tested from the lake to make sure the water being pumped into the nursery is free from fecal coli forms E. coli etc.?</p>
1679f1df	Dale	Pothier	Yarmouth Co.	<p>It's difficult to comment on this lease as the scale of the tank has been redacted on the lease application and the measurements of the nursery have been redacted also. The raw brackish water being pumped from Eel Lake filtered by the oysters and drained back into the lake could contain spat that will end up in Eel Lake causing future Biofouling unless the water being drain back into the lake doesn't contain any spat? Could I have this information clarified please? Again I stress that the capacity and size of the nursery has been redacted which makes the public unaware of the size of productivity of this nursery. It's impossible to know how much spat will get drained into Eel Lake without knowing how many oysters the nursery can contain. Even the pump capacity has been redacted of how much water will be pumped over a 24 hr period. In regards to the public using the lake for boating kayaking fishing etc. Will this nursery affect the public use of the lake or will boaters not be affected by this nursery? Will the water be tested from the lake to make sure the water being pumped into the nursery is free from fecal coli forms E. coli etc.?</p>
e1df0f6d	Michael	Scott	Arcadia	<p>While looking at the criteria for public concerns I feel there are little to no options for residents in the area to express their concerns. (a) this operation is presently heavily subsidized by the Governments once this cash flow ends what then? (b) Who knows what other relevant regulations are under the Act but as a lay person allowing a business in this day an age to pump any water discharge back into a lake is dangerous are not responsible. (c) from what I understand of this operation is that water from the lake will be used to facilitate the growth of oyster spat the water then pumped back into the lake these tanks at some point have to be cleaned of biofouling with some sort of bleach which would then be pumped back into the lake what are the environmental impacts on the lake and other species from this practice? with the climate changes and increase in Blue Green Algae's attributed to chemicals entering our lakes how is this an environmentally safe practice. (d) I have very little confidence in an administration that supports this type of operation financially or morally finding anything relevant in what residents and tax payers of this Province have for concerns regarding this application as I feel without prior public consultations this is a forgone conclusion and just an exercise to show the public has had an opportunity to comment at the end of an already predetermined decision.</p>

Submission ID	First name	Last name	City/Town/Community	Comments
417ade81	Lorelei	Murphy	Wedgeport	<p>The public was asked to comment on a document that has several redactions. These redactions may or may not be very important to the character of the site and the surrounding environment. I feel this is in direct conflict with your own Department's stated mandate of transparency. This leaves the public uninformed as to the potential impacts on the biosphere and the environment in this area. These waters abut protected land and home to protected species. There is no attempt or information provided by either the potential leasee or the Department on whether this operation puts the biodiverse nature of this area at risk. This is a monumental concern when the documents the public is asked to consider provides no information on this issue. Has ongoing water testing been discussed? Is there any possibility that foreign material will enter the biosphere as a result of this operation? To say this is unclear is an understatement. Section 17 of the Fisheries and Coastal Resources Act (1) states that "before accepting results from any laboratory the Minister may require proof of acceptable certification of the laboratory." And (2) the Minister may prescribe standards and procedures for any sampling or analysis that is required pursuant to this act or the regulations". Has the Minister participated in setting any standards or requiring proof of any analyses or procedures or has he decided not to utilize this option? Will he do so in the future? You also have a mandate that states "there will be time for the general public to speak during adjudicative hearing". The public has repeatedly been denied this right to speak by your agent the Municipality of Argyle. This certainly conflicts with your policy of transparency in having an agent or surrogate that denies residents to engage under your own rules. I am not convinced the ecological consequences of this enterprise have been explored by the Minister and I lack confidence that they will be. For this reason I am sorry to say I sadly can not agree to a situation that has potential to advance industry in this area.</p>

Submission ID	First name	Last name	City/Town/Community	Comments
1db19b36	Chris	Thibedeau	Ste. Anne du Ruisseau	<p>Good day this is my Part 1 response to Deon's Nursery Application #1471 in Lwr Eel Brook NS. As a local resident I have great concerns over this application being approved for the flowing reasons. Commercialization of a Residential Area: The villages of Ste Anne du Ruisseau Lower Eel Brook and Glenwood are residential. These are neighborhoods where we live and our children play. We mow our lawns and enjoy taking care of our houses and contributing to our community. I do not support any industry expansion in this area. If Deon's Oysters wish to expand their business into a nursery the Municipality of Argyle has designated industrial parks for this purpose. Deon's already interrupts our quality of life with commercial equipment noise and large transport trucks parked on the side of the road for moving oysters to market. It's gotten out of hand and they need to be encouraged to expand the commercial nature of their business into industrial areas like the Tusket Industrial Park. No one is disputing their desire to expand aquaculture but it needs to be done in non residential areas and DFA needs to encourage them to do it. Do this and you would have our support. Concerns over the environment and further damage to Eel Lake: Deon's started their business in Eel Lake and continued to expand until they realized the amount of bio fouling that was taking place. The lake also limited their ability to expand which is why they moved to Salt Bay. I do not support a land-based nursery that will take water from the lake for processing spat and then return the used water to the lake until CFIA and the Dept of Environment have had ample scientific analysis to ensure the water will not be contaminated or affected in any way. Otherwise your decision is based only on Deon's assessment that the water is "naturally filtered" per their application. We don't believe that to be true and science is required to prove this hypothesis. Until then this application should be paused until further notice. Eel Lake was a pristine and rare Brackish Lake in NS at one time that has now become inundated with bio fouling and oysters growing on docks boat hulls and shorelines. It affects swimming and other recreational activities. The lake is also commonly shut down by DFO due to shellfish toxins. The lake is also home to a rare Asian Carp called the Tautog that needs to be protected. It is the only known lake in NS to have this rare species. From Deon's application we see this: "If we were to pump water throughout the nursery during the summer bio-fouling such as mussels tunicates calcareous worms moss etc. would have spawned and be pumped into the tank. Eventually these organisms would set inside the nursery restricting flow and consuming oxygen/food and potentially hindering the spat's growth or even killing them." What happens when this same bio fouling is pumped through the nursery back into the lake? We won't know until it happens but after approval it will be too late to address. We don't want additional bio fouling in Eel Lake. Set up a nursery elsewhere but not in our neighborhood or in a lake we use for fishing swimming boating and recreation. We do not believe there is proof to show the natural filtration purifies the water as Deon's application suggests. Please ensure further testing is done scientifically before considering this application. As residents we are taking water samples and testing the water today as a baseline and plan to test again regularly if this nursery is approved to demonstrate any changes to the water. In terms of compliance history we are aware of a case where Deon's brought in oysters for growing in Eel Lake with out an approved permit. We are also aware no enforcement was taken at that time and a warning may have been issued. All it takes is one instance of Dermo or MSX to eradicate the entire population of oysters in the lake. We are also aware of Deon's continually trying to push the boundaries of their current installations. Warnings by Natural Resources have been issued with orders to return their installations (Salt Bay) back to the approved boundaries. These instances of noncompliance should be factored into this decision and future decisions by DFA.</p>



Submission ID	First name	Last name	City/Town/Community	Comments
6eed0c31	Chris	Thibedeau	Ste. Anne du Ruisseau	<p>Good day this is my Part 2 response to Deon's Nursery Application #1471 in Lwr Eel Brook NS. Deon's should never have been approved a processing facility in a residential area and now this nursery if approved would be insult to injury. Deon's should not have a carte blanche ability to expand where and when they want yet it appears DFA continues to support their requests with [REDACTED] being ex president of AANS and his son Colton Deon on their board of directors. DFA continues to show the Deon's bias/favoritism and takes prompts from AANS to consider the public as a friction to overcome. It's clear this industry can influence outcomes with DFA at this stage and we don't expect anything other than an approval for Deon's upcoming applications. It's very frustrating to watch DFA cater to Deon's request time and again when its at the expense of the residents and our neighborhood. These awards simply further confirm the bias for their expansion desires and the prejudice against local constituents like me. In response to another quote in Deon's application: "The community is fully aware of DOC's processing building in the area. There has never been any negative impacts from the facility or any opposing comments from the community in regards to our facility. " This is entirely not true. Deon's has a local reputation for clandestinely working behind the scenes with MoDA staff AANS the MLA and DFA to influence their expansion desires. Deon's is in a constant battle with residents including myself due to their arrogance and assumption they can expand where and when they like. The residents have had enough and started fighting back. There is now an open hostility of 2 sides in Argyle. Those who support Deon's consists of about 15% of the population. Those who oppose aquaculture expansion per the current state (e.g. ADA) are at about 85% of the population. This survey data can be provided if requested. I'm also concerned at the escalating hostility between these 2 sides. My house and property have been vandalized to the extent of \$13000 in damage. The Rooco Point Wharf next to my house was set on fire. Mailboxes have been blown up. No one thinks this is a coincidence but Deon's supporters have been intimidating to discourage our advocacy online and some individuals are taking it into their own hands to continue this intimidation into our neighborhood and properties. No one is happy. The RCMP have been notified. Your decisions will escalate or de-escalate this situation but its what happens when you fail to consult the public properly push their only ability to respond to the final 30 days and take prompts form Deon's and AANS to treat us as an obstacle to overcome. Finally please understand that we in fact support aquaculture expansion in Argyle if this expansion occurs in designated commercial zones outside of residential areas. Not alongside our homes on land or on the water. Start there and you will have my support and the support of many. Award this application and those pending award in the next 60-90 days and I fear you will make this local situation so much worse than it currently is. Please make the right decision. Respectfully Chris Thibedeau [REDACTED] Ste Anne du Ruisseau NS [REDACTED] Phone [REDACTED] Email : [REDACTED]</p> <p>The site of this proposed oyster nursery is not the place for another commercial business. It is a residential neighborhood and the municipality has an established business park in Tusket. The company proposing this has said residents don't object but the truth is many do object. They are intimidated. It is already too much noise with trailers banging down the dirt road to the wharf and transport trucks parked on the side of Route 3. Please do not permit this to expand. There is a rare fish a carp in Eel Lake. No one has explained to the public how this could be affected by releasing water from the nursery into the lake. Please ensure studies by qualified biologists are studied and don't take the oyster company's word that the lake won't be harmed. We've all seen the biofouling and any possibility of further damage is unacceptable. I hope this department will not approve this site and encourage the company to apply for one in the industrial park.</p>
06bea632	Donna	Gaudet	Tusket	

## **Public Comment Letter – Aquaculture Site 1471 (Eel Lake, Yarmouth County)**

To:

Department of Fisheries and Aquaculture

Aquaculture Division

Nova Scotia Government

Subject: Public Response Regarding Proposed Site 1471 (Eel Lake, Yarmouth County)

Date: October 21, 2025

Dear Aquaculture Administrator,

I am submitting this letter as a formal public comment regarding Aquaculture Site 1471, located on Eel Lake in Yarmouth County. I was not notified of this proposal, despite living only a few hundred meters from the proposed location and being directly affected by any use or discharge of lake water. I recently learned that the public comment period is open until October 25 and wish to ensure my input is properly recorded.

### **Primary Concerns**

**Environmental Sensitivity of Eel Lake:** Eel Lake is a unique saltwater lake with limited tidal exchange. Any nutrient, chemical, or biological discharge has an immediate and lasting effect on water quality and the health of the ecosystem. Local residents, myself included, have already observed declining clarity, loss of plant life, and a reduction in wildlife over the years.

**Risk of Contamination from Water Intake and Discharge:** The proposal for land-based aquaculture tanks drawing and returning lake water introduces a real risk of further contamination through organic load, changes in salinity, and potential pathogens. Eel Lake's semi-closed system makes these effects cumulative and difficult to reverse.

**Professional Experience and Perspective:** I am employed at Acadian Seaplants Limited in Charlesville, the largest land-based marine plant growing facility in the world. Through this experience, I understand the importance of closed-loop systems and strict environmental controls to protect surrounding ecosystems. From a professional standpoint, I would never recommend using a lake like Eel Lake as a source or return system for land-based



aquaculture. Such practices carry unacceptable ecological risk and contradict sustainable marine cultivation principles.

**Public Notification and Transparency:** I was previously invited to comment on Site 1475 but received no notice regarding Site 1471, even though it is closer to my home. This raises concerns about the fairness and consistency of the public consultation process.

**Cumulative Impact of Multiple Sites:** With several existing and proposed aquaculture operations around Eel Lake, each drawing on the same limited ecosystem, the combined impact poses a serious long-term threat to water quality and biodiversity.

### **Request for Reconsideration**

Given these factors, I strongly urge the Department to deny the application for Site 1471 or at minimum require a comprehensive environmental impact assessment that addresses cumulative water quality and ecosystem effects before any approval is granted.

Eel Lake is not an appropriate location for open-exchange land-based aquaculture. It is a saltwater lake bordered by homes and recreational areas, and its delicate balance should be protected for future generations.

Thank you for considering my submission. Please confirm that this letter will be included in the official public record for Site 1471.

Sincerely,

Donnie Amirault

Lower Eel Brook, NS

**From:** [Aquaculture](#)  
**To:** [Ceschiutti, Robert](#)  
**Subject:** FW: Deons Nursery Application 1471 - Constituent Response - Savriga  
**Date:** October 27, 2025 8:43:16 AM  
**Attachments:** [image001.png](#)

---

*Susanne Holland*

**Licensing Coordinator,  
Nova Scotia Department of Fisheries and Aquaculture**



1575A Lake Road  
Sandy Point, NS B0T 1W0  
Phone: 902-875-7442  
Email: [susanne.holland@novascotia.ca](mailto:susanne.holland@novascotia.ca)

The information contained in this e-mail may contain confidential information intended for a specific individual and purpose. The information is private and is legally protected by law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone or return e-mail. Thank you.

\*\*

L'information contenue dans ce courriel peut être de nature confidentielle et elle est destinée à une personne précise dans un but précis. L'information est privée et protégée par la loi. Si vous n'êtes pas le destinataire du message, vous êtes, par la présente, avisé que toute divulgation, reproduction, distribution ou action prise en s'appuyant sur cette information sont strictement interdites. Si vous avez reçu ce message par erreur, veuillez en informer l'expéditeur sur-le-champ, par téléphone ou par courriel. Merci.

---

**From:** [REDACTED]  
**Sent:** October 25, 2025 10:33 PM  
**To:** Aquaculture <[Aquaculture@novascotia.ca](mailto:Aquaculture@novascotia.ca)>; Hancock, Bruce H <[Bruce.Hancock@novascotia.ca](mailto:Bruce.Hancock@novascotia.ca)>  
**Subject:** Deons Nursery Application 1471 - Constituent Response - Savriga

You don't often get email from [REDACTED] [Learn why this is important](#)

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

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

October 24, 2025

To Whom it May Concern;

This email is in response to Application 1471, DEon's Land-based Nursery in Lower Eel Brook, Nova Scotia.

As a constituent of the Municipality of Argyle, I have very strong concerns regarding the approval of this application.

My home is located in a residential area of Argyle. It was purchased in 2006 with the intention to make this our multi-generational home. It is located on a dead end road offering, peace and quiet, tranquility and beautiful, pristine water views and clear skies. As such, continued upgrades have been made and continue to be made to the house and property in order to pass it along to our daughter and her future family. Most, if not all of our neighbours feel the same way about their homes/properties.

Fast forward to 2014, when unbeknownst to my neighbours and me, an oyster farm was approved/placed in Salt Bay. When we questioned its existence, we were told that it was simply a pilot project and "not to be concerned".

Now in 2025, I'm being asked to outline my concerns about the same oyster farmer's application for a land-based oyster nursery to be placed in the middle of a residential area. Should I continue not to be concerned? Would you?

#### 1-Financially Sound Decision

It is well known that the company in question is heavily subsidized by government grants. Will the government continue to provide this company with funds? Will the company remain viable without government funding? What will happen to it when/if the grants are no longer available? How will the company pay for the mess that they will leave behind in our residential neighbourhood? We see the mess that has been left by the DEon's and previous and current oyster farms on the shoreline. What is going to happen when the mess is left in the water?

Has an economic impact assessment been completed by the province and/or municipality for this site? If no, the simple answer is that this application should not be approved.

#### 2-Scientific Assessment

Has a scientific/environmental study been completed to determine the impact

that this nursery will have on the water it is using for production? What happens when sick oysters/parasites are found in the water? What happens when equipment needs to be cleaned? What cleaning products will be used? Who is the oversight to ensure that the business is following approved processes? What happens when equipment is faulty?

We've witnessed the mess that has been made of Eel Lake by oyster farms. Will a nursery continue to ruin this rare brackish lake? What should be the pride of argyle is completely being ruined by the oyster business. How do governments plan to protect the lake and the species that live in it?

As one of my fellow constituents has clearly stated, allowing a (unsupervised) business to pump any water discharge back into a lake is dangerous and irresponsible.

### 3-Stakeholder Engagement

Why has there been no stakeholder engagement conducted for this application? It will have lasting effects on neighbourhood constituents and a 30 day window to respond to an application that has not been explained to us is unjust. Stakeholder engagement is a key element to any new project/policy/installation. You should know this.

### 4-Our Residential Community

Our villages of Ste Anne du Ruisseau, Lower Eel Brook and Glenwood are residential areas. This is where we swim, boat, and welcome our family and friends to enjoy our water views and all that it has to offer. The commercialization of a residential area when there are industrial parks available in Argyle is an atrocity. DEon's have already disrupted tranquility of our neighbourhood with constant noise, trucks and workers. They have options to conduct their business in non residential areas. Please do not permit them to create further unrest in our small community.

### 5-History of DEons

To be clear, I have witnessed this business and how it operates and I am not comfortable that the DEon's will follow environmental requirements. They have a strong history of not following the rules. Their history of non compliance should be a major factor when assessing their application.

## Summary

I am extremely concerned for our environment and our community if you allow oyster farmers to continue to have an adverse effect on both. As such, I cannot support a land-based nursery that will take water from the lake for processing spat and then return the used water to the lake.

Sincere regards,  
Susan Savriga

[REDACTED]  
SAR, NS. [REDACTED]

Oct 25, 2025

Good day, this is in response to Deon's Nursery Application #1471 in Lwr Eel Brook, NS.

As a local resident, I have great concerns over this application being approved for the following reasons.

Commercialization of a Residential Area:

The villages of Ste Anne du Ruisseau, Lower Eel Brook, and Glenwood are residential. These are neighborhoods where we live and our children play. We mow our lawns and enjoy taking care of our houses and contributing to our community. I do not support any industry expansion in this area. If Deon's Oysters wish to expand their business into a nursery, the Municipality of Argyle has designated industrial parks for this purpose. Deon's already interrupts our quality of life with commercial equipment, noise, and large transport trucks parked on the side of the road for moving oysters to market. It's gotten out of hand and they need to be encouraged to expand the commercial nature of their business into industrial areas like the Tusket Industrial Park. No one is disputing their desire to expand aquaculture, but it needs to be done in non residential areas, and DFA needs to encourage them to do it. Do this and you would have our support.

Concerns over the environment and further damage to Eel Lake:

Deon's started their business in Eel Lake and continued to expand until they realized the amount of bio fouling that was taking place. The lake also limited their ability to expand which is why they moved to Salt Bay. I do not support a land-based nursery that will take water from the lake for processing spat and then return the used water to the lake, until CFIA and the Dept of Environment have had ample scientific analysis to ensure the water will not be contaminated or affected in any way. Otherwise, your decision is based only on Deon's assessment that the water is "naturally filtered" per their application. We don't believe that to be true and science is required to prove this hypothesis. Until then, this application should be paused until further notice. Eel Lake was a pristine and rare Brackish Lake in NS at one time that has now become inundated with bio fouling and oysters growing on docks, boat hulls, and shorelines. It affects swimming and other recreational activities. The lake is also commonly shut down by DFO due to shellfish toxins. The lake is also home to a rare Asian Carp called the Tautog, that needs to be protected. It is the only known lake in NS to have this rare species.

From Deon's application we see this:

*"If we were to pump water throughout the nursery during the summer, bio-fouling such as mussels, tunicates, calcareous worms, moss, etc. would have spawned and be pumped into the tank. Eventually these organisms would set inside the nursery,*



*restricting flow and consuming oxygen/food and potentially hindering the spat's growth or even killing them."*

What happens when this same bio fouling is pumped through the nursery back into the lake? We won't know until it happens, but after approval it will be too late to address. We don't want additional bio fouling in Eel Lake. Set up a nursery elsewhere but not in our neighborhood or in a lake we use for fishing, swimming, boating, and recreation. We do not believe there is proof to show the natural filtration purifies the water as Deon's application suggests. Please ensure further testing is done scientifically before considering this application. As residents we are taking water samples and testing the water today as a baseline and plan to test again regularly if this nursery is approved to demonstrate any changes to the water.

In terms of compliance history, we are aware of a case where Deon's brought in oysters for growing in Eel Lake with out an approved permit. We are also aware no enforcement was taken at that time and a warning may have been issued. All it takes is one instance of Dermo or MSX to eradicate the entire population of oysters in the lake. We are also aware of Deon's continually trying to push the boundaries of their current installations. Warnings by Natural Resources have been issued with orders to return their installations (Salt Bay) back to the approved boundaries. These instances of noncompliance should be factored into this decision and future decisions by DFA.

Deon's should never have been approved a processing facility in a residential area, and now this nursery if approved would be insult to injury. Deon's should not have a carte blanche ability to expand where and when they want yet it appears DFA continues to support their requests with [REDACTED] being ex president of AANS, and his son Colton Deon, on their board of directors. DFA continues to show the Deon's bias/favoritism and takes prompts from AANS to consider the public as a friction to overcome. It's clear this industry can influence outcomes with DFA at this stage, and we don't expect anything other than an approval for Deon's upcoming applications. It's very frustrating to watch DFA cater to Deon's request time and again when its at the expense of the residents and our neighborhood. These awards, simply further confirm the bias for their expansion desires, and the prejudice against local constituents like me.

In response to another quote in Deon's application:

*"The community is fully aware of DOC's processing building in the area. There has never been any negative impacts from the facility or any opposing comments from the community in regards to our facility. "*

This is entirely not true. Deon's has a local reputation for clandestinely working behind the scenes with MoDA staff, AANS, the MLA, and DFA to influence their expansion desires. Deon's is in a constant battle with residents including myself due to their arrogance and assumption they can expand where and when they like. The residents

have had enough and started fighting back. There is now an open hostility of 2 sides in Argyle. Those who support Deon's consists of about 15% of the population. Those who oppose aquaculture expansion per the current state (e.g. ADA) are at about 85% of the population. This survey data can be provided if requested. I'm also concerned at the escalating hostility between these 2 sides. My house and property have been vandalized to the extent of \$13000 in damage. The Rooco Point Wharf next to my house was set on fire. Mailboxes have been blown up. No one thinks this is a coincidence, but Deon's supporters have been intimidating to discourage our advocacy online, and some individuals are taking it into their own hands to continue this intimidation into our neighborhood and properties. No one is happy. The RCMP have been notified. Your decisions will escalate or de-escalate this situation, but its what happens when you fail to consult the public properly, push their only ability to respond to the final 30 days, and take prompts form Deon's and AANS to treat us as an obstacle to overcome.

Finally, please understand that we in fact support aquaculture expansion in Argyle, if this expansion occurs in designated commercial zones outside of residential areas. Not alongside our homes on land or on the water. Start there and you will have my support and the support of many. Award this application and those pending award in the next 60-90 days, and I fear you will make this local situation so much worse than it currently is.

Please make the right decision.

Respectfully,



Chris Thibedeau



Ste Anne du Ruisseau NS



Phone [REDACTED]

Email : [REDACTED]