

Decision – Application to Administrator

Application Summary:

Reference Number:	REF#533 (AQ#1475)
Application Class:	CLASS II
Application Type:	NEW LICENCE / LEASE
Abstract:	Application for a new aquaculture licence and lease within a designated Aquaculture Development Area
Applicant Name:	D'Eon Oyster Company Ltd.
Date Received by Department:	February 21, 2025
Location:	Salt Bay
County:	Yarmouth
Site Type:	Marine
Operation Type:	Commercial

Proposed Licence / Lease Information:

Site Size (in hectares):	12.01
Method(s) of Cultivation:	Suspended
Species:	American oyster
ADA Site No.	8012
Application File No.	1475

Decision:

Decision Issued:	Approved
Signature and Date:	
	Robert Ceschiutti, Aquaculture Administrator

Definitions:

The following are terms, acronyms and definitions that may appear in this document:

Act means the Nova Scotia *Fisheries and Coastal Resources Act*

ADA means “Aquaculture Development Area”

CFIA means the Canadian Food Inspection Agency

Department means the Nova Scotia Department of Fisheries and Aquaculture

DFO means the Department of Fisheries and Oceans Canada

Prior Regulations means the Nova Scotia Aquaculture Licence and Lease Regulations, O.I.C. 2015-338 (issued October 26, 2015), N.S. Reg. 347/2015, amended to O.I.C. 2019-322 (effective November 12, 2019), N.S. Reg. 186/2019.

Regulations means the Nova Scotia Aquaculture Licence and Lease Regulations, O.I.C. 2025-371 (issued December 16), 2025, N.S. Reg. 276/2025.

Site History:

On April 15, 2024, the Argyle ADA was designated representing 53 sites for shellfish and marine plant aquaculture, within Lobster Bay and Pubnico Harbour, Yarmouth County.

On April 15, 2024, the Minister issued a public Call for Proposals for the exclusive right to apply for an aquaculture licence and lease for ADA Site No. 8012, with a submission deadline of June 15, 2024.

On January 22, 2025, the Administrator issued a decision to select D'Eon Oyster Company Ltd. (the applicant) as the successful proponent and was given 90 days to submit an application for a new aquaculture licence and lease within ADA Site No. 8012.

Consultations on Application to Administrator:

Pursuant to Clause 32(a) of the Regulations, the Administrator must undertake consultations with any of the following as required under the laws of the Province or of Canada with respect to the application:

- A department or agency of the Government of Nova Scotia
- A department or agency of the Government of Canada

As such, consultations were undertaken with the following departments or agencies:

Government of Nova Scotia:

- Department of Fisheries and Aquaculture

It is important to note that these consultations do not include the work performed by the Department prior to the designation of the Argyle ADA.

Pursuant to Clause 32(b) of the Regulations, the Administrator may undertake consultations with any person, group of persons or organization they consider necessary in the circumstances.

As such, consultations were undertaken with the following person(s) or organization(s):

- Centre for Marine Applied Research (CMAR)

Public Submissions on Application to Administrator:

The application, following the completion of consultation, was referred to the Administrator on September 16, 2025. At that time, the Prior Regulations were in effect. Pursuant to Section 41 of the Prior 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 October 15, 2025.

10 submissions were received by the Department, all of which were during the 30-day public comment period. All 10 submissions *in general* met the requirements set out in Section 41 of the Prior Regulations (see below for exceptions) and have been included with this document (refer to **Supplement 1: Written Public Submissions**).

One or more public submissions included material in a form other than written, including but not limited to, photographs and charts. Such material was not eligible for consideration by the Administrator under Section 41 of the Prior Regulations (Section 43 of the Regulations). However, consistent with previous decisions made on aquaculture applications under the Prior Regulations, the Administrator has chosen to include any such material with this document *if the material was created by the individual submitting the comment for the purpose of this specific application and met the terms applicable to the use of Government of Nova Scotia websites*.

One or more public submissions included offensive, repetitive or irrelevant content. This content has been redacted or removed by the Department to ensure compliance with the terms applicable to the use of Government of Nova Scotia websites (a copy of those terms is available at <https://www.novascotia.ca/terms>).

Factors to be Considered:

Under Section 17(1) of the Regulations, in making decisions related to marine aquaculture sites, the Administrator must take into consideration the optimum use of marine resources, as determined by taking into consideration the following factors only:

- a) The contribution of the proposed operation to community and Provincial economic development;
- b) Fishery activities in the public waters surrounding the proposed aquacultural operation;
- c) The oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation;
- d) The other users of the public waters surrounding the proposed aquacultural operation;
- e) The public right of navigation;
- f) For marine finfish applications, the sustainability of wild salmon;
- g) The number and productivity of other aquaculture sites in the public waters surrounding the proposed aquacultural operation.

All of the above factors have been taken into consideration prior to making the decision on this application. The following is a summary of the outcomes of the Departmental review and any consultation undertaken (where indicated above). This summary is not intended to be an exhaustive account of the results following review and consultation.

The optimum use of marine resources

The applicant's proposed development suggests an optimum use of marine resources, taking into account the amount of product proposed to be cultivated and the size of the proposed site. Department staff will monitor that the proposed production plan is implemented and that the site is utilized for Aquaculture.

The contribution of the proposed operation to community and Provincial economic development

The species and method of cultivation for this site are suitable for this area and are expected to be a positive contribution to the local and provincial economy. The applicant uses equipment sourced locally where possible and has committed to use local suppliers where possible. The Department has noted that the applicant did not intend to increase the number of employees, should the application be approved, and this has been taken into account prior to issuing this decision. There were no conclusive adverse economic impacts associated with this application.

Concerns were raised by the public regarding the potential impact of the proposed aquaculture site on real property values within the surrounding area. Concerns were also raised by the public regarding the potential impact of the proposed aquaculture site on their view of the surrounding waters. In addition to involving subjective aspects and being speculative in nature, such concerns, it is noted, do not come within the scope of criteria that the Administrator must take into account with respect to this application, further to Subsection 17(1) of the Regulations. Having said this, of note in this context is Section 76 of the Regulations, which states that “A licensee must conduct their aquacultural operation so as not to deprive any owner of real property adjacent to a body of fresh, brackish or marine water from reasonable access to and from the water.” (Section 76 of the Regulations is also relevant below, in the context of the public right to navigation.) In addition, it is noted that all aquaculture operators are required to have plans in place to mitigate any noise that may occur on site and have strategies for waste management and maintaining the site in good order as part of their Farm Management Plan.

Fishery activities in the public waters surrounding the proposed aquacultural operation

This application was assessed to consider any potential impact to fishery activities within and surrounding the proposed site boundaries. There was no indication that this application would have any meaningful impact on any specific fishery activities, comparing the size of the proposed site with the size of the surrounding waterbody.

The oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation

Concerns were raised by the public regarding the potential of spreading disease. The issue raised is general in nature and is mitigated through the Introductions and Transfers Licence program administered by DFO. The Introductions and Transfer Committee (ITC) is comprised of members from DFO, CFIA and corresponding provincial authorities. The ITC assesses applications (to move aquatic organisms) for genetic, ecological, and disease risks.

The applicant’s development plan has taken into account the oceanographic and biophysical characteristics of the public waters surrounding the proposed operation. These culture methods are common and successful within this region, which suggests suitable oceanographic environment for culture of shellfish such as Oysters.

Assessment of the information available in the Site Report for ADA site no. 8012 previously determined that there was no indication of Eel grass (*Zostera marina*) meadows within the site, and it was rare to see free-floating strands of Eel grass. The Department has provided the applicant with recommended measures to avoid and mitigate the potential for prohibited effects to fish and fish habitat (in the event the application is subsequently approved). Provided the measures are incorporated into the applicant’s Farm Management Plan, the proposed operation is not likely to result in the contravention of the Fisheries Act, Species at Risk Act and Aquatic Invasive Species Regulations prohibitions and requirements.

The other users of the public waters surrounding the proposed aquacultural operation

The proposed operation is not expected to have an unacceptable level of impact to wildlife or wildlife habitat, provided that waste material is disposed of properly. The applicant has been provided with strategies to mitigate impact to sensitive species and other migratory birds (in the event the application is subsequently approved).

The public right of navigation

Concerns were raised by the public regarding the ability to navigate commercial and recreational vessels safely around the proposed aquaculture site. Should an aquaculture licence and lease be granted, the operator will be required to obtain approval by Transport Canada under the *Canadian Navigable Waters Act* for the placement of works (i.e. aquaculture gear and navigation buoys).

The number and productivity of other aquaculture sites in the public waters surrounding the proposed aquacultural operation

There is no evidence to suggest that the proposed operation would negatively impact the productivity of other aquaculture sites.

Decision:

Based on the factors considered above, the application for a new aquaculture licence and lease within designated Aquaculture Development Area (ADA) No. 8012 is hereby **approved**. The associated aquaculture site is henceforth known as AQ#1475. The remaining area of designated ADA No. 8012 that is not within AQ#1475 shall remain eligible for future applications, pursuant to the Act and Regulations.

Implementation:

The licence and lease documents shall be prepared in accordance with the Department's standard operating documents. The decision shall be deemed implemented once the licence and lease documents have been signed by all parties. The licence and lease shall be made publicly available subject to the provisions of the Freedom of Information and Protection of Privacy Act, once the decision has been implemented.

Supplement 1: Written Public Submissions

Written Public Submissions via online form (1 page)

Written Public Submissions via email (27 pages)

The Department does not endorse, and is not responsible for, the content of the included submissions, including, but not limited to, the accuracy, reliability, or currency of the information contained wherein.

Wherever they may occur, text within public submissions will have been redacted by the Department for the purpose of protecting personal information, including but not limited to, names, addresses, and contact information, with the exception of the following:

- The name and community of the individual submitting the written public comment
- The name of the applicant and any authorized contacts, as listed on the application form
- Names and contact information of politicians
- Names and contact information of municipal, provincial, and federal employees
- Names of aquaculture licence holders
- Names of authors of published works

The Department also reserves the right not to post submissions or to redact certain details from submissions, in accordance with the Terms of Use for government websites, web applications or web communications (copy of terms available at <https://beta.novascotia.ca/terms>).

First name	Last name	Community	Comments
Eric	Vacon	St Anne du Ruisseau	<p>I am a commercial gaspereau fisherman that holds a gill net license for this area and was never advised of this last time . There are 2 licences for that area. We pleasure boat there all the time getting harder and harder because the channel is full of gear. Plus we have been duck hunting there for 50 years.</p> <p>The following are my comments on the proposed Aquaculture sites as per the DFA regulations. #1) this is not optimum use of marine resources as this is an introduction of a Commercial farmed species with possible introduction of invasive or diseased species. #2) There is no economic benefit to the local economy no Municipal taxes generated no jobs generated. In fact if PEI is the test case there will be an economic drain on the community as disease has all but decimated that industry. #3) These are public waterways and will restrict the use by the public for recreational boating fishing as well as a possible change in the commercial rock weeding or gaspereau fishery. #4) This could possibly affect the surrounding public waters shorelines and beaches with the biofouling and cleaning process also with the sinking of the cages to the bottom through the winter months may have detrimental effects on the river bottoms #5) Any large-scale commercial aquaculture sites are going to restrict the public’s right to navigation in public waters especially when placed in residential areas. A lot of residents access these waters from their properties or public wharfs that will now be restricted by these operations. #7) N/A #8) There are a number of aquaculture sites in the area now on our public waterways to increase any further increases the chance of disease and possible environmental contamination as has been shown by trying to farm on such a large scale once again PEI as an example. Despite its benefits oyster farming also has some negative impacts on the environment. One concern is the potential for oyster farms to disrupt natural habitats. Oyster farms can alter the seabed reduce the amount of sunlight that reaches the ocean floor and interfere with the movement of sediment. Another concern is the use of materials such as plastic and metal in the construction of oyster farming equipment. These materials can have negative environmental impacts if they are not properly managed and disposed of. Finally there is the risk of disease transmission between farmed and wild oysters. If farmed oysters become infected with a disease they can spread it to wild oyster populations and cause significant harm.</p>
Deborah	Scott	Arcadia	<p>I strongly disagree with further expansion of aquaculture in Saltbay. A serious risk to the existing marine life and bird habitat plus the general health of the bay’s diversity is being ignored. Of specific concern is the lack of eel grass and battered conditions of existing. Eel grass is a major player in sequestering carbon and further studies are being conducted. Our salt marshes need protection before disasters occur. I have witnessed osprey herons eagles king fishers yellowlegs plovers ducks of all kinds.. plus many other species make the bay their home. The current aquaculture has more than doubled within the past few years decreasing availability of public rite of navigation. Of concern is also the huge tractor trailers that literally block off the hwy 3 outside the aquaculture workshop entrance. The road is narrow with many turns not meant to provide right of way to a busy business as many walkers use the route as well. I have noticed much change on my shoreline since purchasing my property back in 2021. A scum has showed up. I ask the future be considered climate change warming of our oceans needs to be of more or on equal ground as businesses. Especially businesses that are providing a luxury food item. My concern is also with monitoring the operation of the aquaculture’s activities in face of the unknown future of climate change. The municipality of Argyle does not have my full confidence.</p>
Dale	Sullivan	SAR	<p>My name is Dale Pothier. I am a life long resident of Lr. Eel Brook. I spent my first 19 years living on Eel Lake and the following 54 years living on Salt Bay. Since Department of Aquaculture only allows us to comment of this lease site through 8 factors of their choice this is all I will comment on. 1.) the optimum use of marine resources; Oyster farming infrastructure such as racks cages ropes can physically alter the marine environment. This can shade the seabed which may reduce or eliminate sensitive habitats like seagrass beds that require sunlight grow. Oysters are filter feeders that remove phytoplankton and other suspended particles from the water column. Intensive farming can deplete the natural food sources available to wild populations of fish larvae potentially impacting their growth and survival. Oysters produce waste (feces and pseudofeces) which settles on seabed beneath the farms in turn can lead to changes in the benthic community creating hypoxic (low oxygen) conditions and potentially releasing excess nutrients. We have natural fishing of Eels and gaspereau in Salt Bay. Gaspereau better known as kiacks in Salt Bay have been coming through here for years to get to Eel Lake and up into the brooks. 2.) the contribution of the proposed operation to community and Provincial economic development According to section 5 of the aquaculture lease # 1475 the existing grading infrastructure on Lease #1400 is capable of supporting the proposed expansion therefore no impact to the community in economic growth. No research has been done on economical impact on the community on oyster farming on Eel Lake over the last 20 years. Oyster Farms are not taxable as they are established on water. 3.) fisheries activities in the public waters surrounding the proposed aqua-cultural operation. According to section 5 of #1475 lease feedback and concerns of the community who reside on the waterfront land on Salt Bay expressed concerns about public engagement and potential impacts on recreational boating routes. d'Eons Oyster Co. adjusted the lease size to exclude the area north of the tip of Roberts Islands. This doesn't solve the problem going from East to West. If a kayaker runs into problems while they're on the west side of the lease there is no way to get to the public wharf without going all the way around the lease. The only channel for kayakers or boaters to go through the lease is from north to south or south to north. That seems very unsafe for boaters that have to go from east to west or west to east. 4.) the oceanographic and biophysical characteristics of the public waters surrounding the proposed aquacultural operation; Salt Bay offers a sheltered environment from strong winds and currents. Growing up here Salt Bay was home to many different species of ducks and the Canadian geese always landed in Salt Bay. I've noticed in the last 10 years or so since the oyster farm has been present the only wildlife I see on the Bay are the Cormorants that sit on the oyster cages. the geese and ducks don't land here anymore. Ecosystems? 5.) the other users of the public waters surrounding the proposed aquacultural operation; Kayakers frequent Salt Bay and find it too difficult to Kayak around these oyster farms. Boaters have been very limited to leave their boats in the water due to biofouling. Biofouling can introduce non-native species and harm the local ecosystems. Biofouling is the settlement and growth of organisms that compete with oysters for food and space. These organism attach themselves to wharfs boats rocks etc. Last winter we noticed that the even icecakes that came ashore had oyster shells on them from the present farm. With an expansion Salt Bay will be covered with biofouling and Cormorants. Such a devastation to our beautiful natural Salt Bay. 6.) the public right of navigation The public should have complete rights of navigation. With the present farm on Salt Bay navigation has been diminished and with an expansion it won't be safe boating after dark or kayaking at any time. These farms in residential areas have taken away our privacy and will decrease our property values. No one wants to purchase property on the water with an oyster farm obscuring their beautiful view. Placing these farms in non residential areas would keep the property values up and the environment pristine. 7.) the sustainability of wild salmon (and) I'm not familiar with wild Salmon in Salt Bay but I know that there are gaspereau that run every spring to get from Salt Bay to Eel Lake and up into the brooks. These farms could damage the ecosystems that support the gaspereau as well as other fish. 8.) Salt Bay has been the home for Eels for many years and kiacks. I believe the ADA should have been research properly and the residents should have been consulted. My neighbors and myself that live on Salt Bay were never consulted.</p>

Public Comment Submission

Re: Proposed D'Eon Oyster Company Ltd. Aquaculture Lease – Notification Area 1475

To:

Department of Fisheries and Aquaculture
Aquaculture Division
Government of Nova Scotia

Date: October 17, 2025

Dear Aquaculture Review Committee,

I am writing as a nearby property owner and long-time resident to formally oppose the proposed D'Eon Oyster Company Ltd. shellfish aquaculture lease (Notification Area 1475). While I understand that aquaculture supports rural employment and Nova Scotia's economy, this specific proposal raises significant environmental and community concerns based on direct local experience.

1. Environmental degradation already observed at Eel Lake

I live on Eel Lake, which has already been heavily impacted by similar oyster farming activities. Over the years, these operations have caused serious degradation of the ecosystem — increased sedimentation, cloudy water, and a clear decline in biodiversity. The lake is no longer what it once was; the water is no longer suitable for recreation, and the familiar sounds of wildlife such as loons have nearly disappeared. This isn't speculation — it's firsthand experience of what these projects can do when placed in fragile or enclosed environments. Given that Eel Lake connects to the same coastal system, approving another lease in the adjacent bay risks extending this pattern of environmental decline further along the coast.

2. Impact on wild species and habitat

Oyster operations alter water movement, deposit organic waste, and smother eelgrass beds that serve as nurseries for many wild species. These habitats take years — if not decades — to recover once damaged. The bay supports a variety of wild shellfish and finfish populations that could be displaced or stressed by new installations.

3. Cumulative and visual impact

The area already hosts aquaculture sites, and adding another contributes to cumulative ecological stress and the industrialization of the coastline. The visual footprint — buoys, cages, and workboats — also reduces the natural and recreational value of the shoreline for residents and visitors.

4. Inappropriate proximity to residential properties

A major concern is the placement of this site directly near homes. Many of us live along this shoreline and value the quiet, natural environment it provides. The ocean is vast, and there is no valid reason these farms must be positioned so close to residential properties.

Locating industrial aquaculture directly in front of people's homes affects property values, limits safe boating and swimming, and changes the very character of coastal living. There are many alternative offshore or less populated areas that could support aquaculture with fewer community and environmental conflicts. By allowing such operations to encroach on residential waters, the province risks eroding public trust and damaging one of Nova Scotia's most valuable long-term resources — its unspoiled coastline.

5. Lack of community consultation

Residents were given minimal notice and no opportunity for in-person discussion. Given the potential long-term effects on water quality, wildlife, and property use, this community deserves a broader and more transparent review process, including a public meeting and full environmental impact assessment before any approval.

Request

For these reasons, I strongly urge the Department to deny this application or, at minimum, require a comprehensive environmental and community impact study before proceeding. Nova Scotians value sustainable aquaculture, but it must be done responsibly and away from residential shorelines that have already borne the cost of poor siting decisions.

Sincerely,

Donnie Amirault

Lower Eel Brook, Nova Scotia



[REDACTED]
Yarmouth, Nova Scotia

I am writing on behalf of Mabel Systems, a Nova Scotia-based technology company that supports sustainable seafood & aquaculture operations throughout Atlantic Canada. We are submitting this comment in support of DEon Oyster Company Ltd.'s proposed new oyster lease in Salt Bay, Yarmouth County (Application AQ#1475).

We've had the pleasure of working with D'Eon Oyster Company and have seen firsthand their professionalism, innovation, and genuine care for sustainable aquaculture. Their work creates meaningful local jobs and helps strengthen the community by keeping opportunities and economic activity here at home.

The proposed lease area in Salt Bay is a great fit for oyster farming. The water there is shallow and full of ledges, making it less practical for regular boating but perfectly suited for aquaculture. It's also worth noting that D'Eon Oyster Company's lease will be reviewed through Transport Canada's Navigation Protection Program, which ensures that safe passage is maintained for anyone traveling through the area. Oyster farming is not only low impact but beneficial - oysters naturally filter and clean the water, helping to keep the bay healthy and balanced.

We truly believe this lease will have a positive impact — creating opportunities for local people, supporting sustainable growth, and adding to Nova Scotia's reputation for producing exceptional, responsibly farmed seafood. We're proud to support D'Eon Oyster Company's application and encourage its approval.

Thank you for considering our comments.

Sincerely,

[REDACTED]

Mabel Systems

[REDACTED]

From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: Public comment: DEon Oyster Co, Salt Bay
Date: October 21, 2025 2:38:00 PM

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

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To whom it may concern,

I strongly support DEon Oyster Company's application for the new oyster lease in Salt Bay. As Founder and CEO of word-craft, a Yarmouth-based social media marketing agency, I've worked with DEon Oyster Co since 2020. They actively support local businesses like mine, which strengthens our rural economy. Through managing their social media, I see firsthand that 100% of community feedback they receive on their own social media channels is positive and supportive.

Salt Bay's shallow entrance makes aquaculture the best use for this area, and Colton and [REDACTED] have proven themselves to be responsible operators. I hope this application is approved and I'm happy to support it.

Thank you,
Ingrid Deon

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Ingrid Deon (she/her)
Founder + CEO, word-craft inc.

[REDACTED]



From: [REDACTED]
To: [Aquaculture Administrator](#)
Subject: feedback on proposed fish farm
Date: November 13, 2025 5:50:50 PM

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Hello, a few comments on proposed site # 1475 , I am personally totally against it. No. 1 this is a residential place not an industrial park, EEI lake has already been destroyed with all the oyster beds. there is no longer any swimming, very little boating in our once pristine lake. Adding a new land fish farm with waters emptying into the lake just adds more pollution. As for the new site on salt bay it will seriously prohibit people from using public waters for boating rockweeding fishing etc. As far as contribution to the community I have seen about none. I know of 1 person being employed there. there may be more but unaware of it. The only people benefiting as far as I can see are the Deons. Also transport trucks parked on the wrong side of the road in front of Deons business is an accident waiting to happen.

From: [REDACTED]
To: [Aquaculture Administrator](#)
Cc: [Hancock, Bruce H](#); [Malcolm Madden](#)
Subject: Public Comment for Deon's Oyster Company (DOC) Application for a Navigational Protection Program (NPP) - Registry # 12445 located in Salt Bay N.S. - Proposed leases #1475 & #8012
Date: November 14, 2025 5:37:12 PM

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Dear DFA,

This email contains my comments, issues and concerns related to Deon's NPP application for sites 1475 and 8012.

By way of background, Salt Bay, recognized under the Canadian Navigable Waters Act (Chart #4244), is bordered by Eel Brook, Eel Lake, Glenwood, Robert's Island, and Rocco Point. This is a residential area with approximately 100 private homes located along its shoreline. There are three public wharves (located at Eel Brook Bridge, and Lower Eel Brook and Rocco Point) located in this area that are funded by taxpayers.

The area also features 11 private wharves. As this indicates, Salt Bay is primarily a residential recreational area and many residents have private boats. It is through boating that we have met (and in turn become friends with) our neighbours. Throughout the spring, summer and fall, many group boating excursions are enjoyed by our local community with trips:

- to the traditional (historical Acadian) Tusket Islands where our ancestors worked and lived;
- to the aboiteaux (barriers built by Acadians to reclaim and protect fertile tidal marshes) located in Salt Bay;
- to Surettes Island, to visit neighbours and family;
- touring visiting family and friends around our vast and pristine waters, showing off its beauty and tranquility.

It is during these journeys that we are able to see and experience historical Nova Scotia and where and when generational stories are told and passed down to the next generations. This is how we preserve our strong Nova Scotian heritage. Establishing and expanding an oyster farm in a location that we have traditionally used (for our recreational water activities and historical learning)

restricts local residents from accessing it. Why should our generational waterways be taken away? Why should it be handed over to DOC for their exclusive use? It saddens me to think that recreational boaters will be deterred from sharing these experiences and our history will be lost all for the sake of one small company.

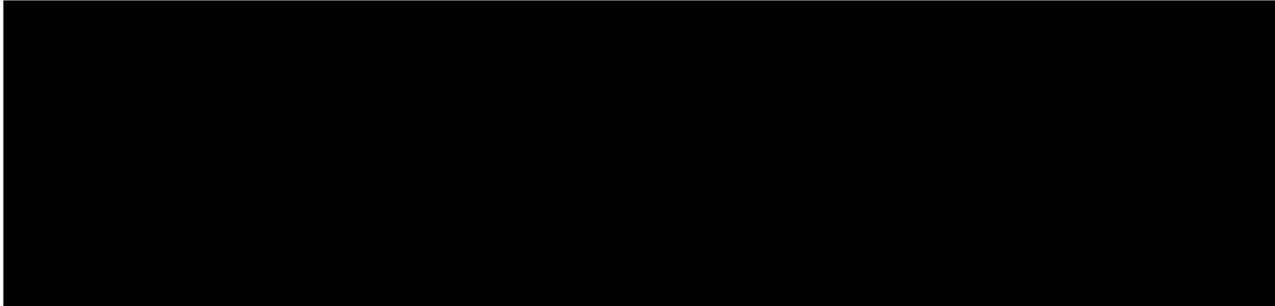
Should sites 1475 or 8012 be approved, all boating routes will change. Boating traffic will be rerouted from Big Sluice to Little Sluice. Those that do not live in the area will never fully understand the impact that this will have on our community navigating these waters. Big Sluice is navigable. Little Sluice is dangerous. I cannot underline how difficult it is for the most experienced boater to travel through Little Sluice. The channel is an ever-changing rapid with underlying rocks and a 12 foot tide differential. At low-tide, Little Sluice is no more than 2.5ft deep 8 ft wide with fast-moving treacherous rapids. At mid-tide, it appears safe to cross, but it is not (hidden rocks). Boaters themselves struggle to make it through Little Sluice, often hitting rocks and forced to abandon their attempt and travel through Big Sluice. There is a small window of time at high tide where boaters with knowledge of this waterway attempt to travel through it. I speak from experience because I have watched it happen from my backyard. I have had to shout directions to boaters and encourage them to turn around. Should Little Sluice become the only waterway leading to open water, I fear that it is only a matter of time that someone will be gravely hurt.

Salt Bay is not only used for boating but additional recreational activities, including rock-weeding, inshore lobster fishing, fishing, kayaking, stand up paddle boarding, canoeing, swimming and beach-combing. It is peaceful, harmonious and tranquil and we love (and choose) to live here.

Deon's Oyster Company quietly opened a new farm in Salt Bay in 2014. When we questioned its existence, we were told that it was simply a pilot project and not to be concerned. Sadly, because of this "pilot" farm, we lost a safe way to access the historical Acadian aboiteaux. We watched this company encroach into areas of the water that were not included in their lease. Currently we are witnessing this company apply for an expansion in this small bay. Their history of non compliance should be a major factor when assessing their application.

To be clear, no legitimate stakeholder engagement with constituents has ever been conducted for the Aquaculture Development Area in Argyle. If it had

been done, residents would have taken the opportunity to voice their concern(s) and recommend that farms be placed outside of residential areas. Instead, Deon's have worked behind the scenes to ensure that they: 1) gain municipal support for this program; 2) influence where leases will be made available; 3) win the lease application bid to ensure that they have the easiest access to their farms; and 4) inconvenience the entire community (by blocking their ability to navigate historical waterways) for their own convenience. The expansion that DOC has applied for will only benefit DOC at the expense of the community.



Simply put, we need and desire a solution that will allow DOC to expand in non-residential areas of the much larger Lobster Bay in lieu of changing the residents entire ability to navigate from Eel Lake to Roberts Island, and from Salt Bay to open water (and back).

Thank you for your consideration of my comments and concerns. I trust that Transport Canada will find that true navigable conflicts and concerns exist with DOC's application and that it will not be approved.

Sincerely,

Susan Savriga



Sainte Anne du Ruisseau

Nova Scotia.



November 14, 2025 (submitted before deadline)

“Confidential”

Public Comment Period for Deon’s Oyster Company Application for Sites 1475 and 8012

Dear NS DFA,

Recognizing NS DFA has approved all applications received in 2024 and 2025, I do not foresee a willingness or capability for this organization to act fairly as a true government regulator having been fully transformed into an industry facilitator through aggressive lobbying and indoctrination by the Aquaculture Association of Nova Scotia. This has created an imbalance and has removed the public from being treated as an equal stakeholder. I’m hopeful NS DFA, can still weigh both sides of this issue through the inclusion of the public as an equal stakeholder as it is the public who is directly affected by this application. The following feedback and issues have been provided. I expect my concerns to be addressed and solved before approving Deon’s application for expansion into lease sites 1475 and 8012.

Corrections in Deon’s Application





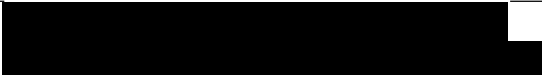
#	Deon’s Application Statement	Correction and Response
1	Deon Oyster Company (DOC) currently cultivates Atlantic Oysters using suspended culture methods in approximately 50% of lease #1400, using 6-bag OysterGro cages. Detailed measurements of the cages can be found in Attachment A. This partial utilization is due to the lease's location in a tidal area, where the channel (a consistently deep water area even at low tide) comprises about 50% of the lease space.	The current lease (site #1400) makes it impossible for anyone to use the water for recreational purposes. [REDACTED]

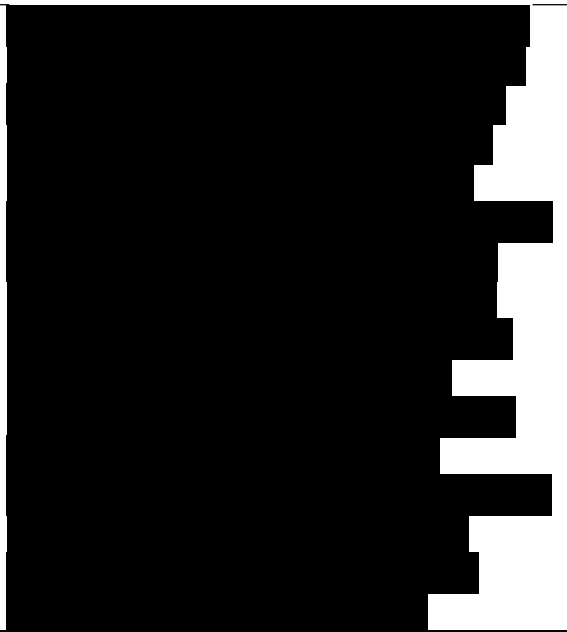
2	Annually, DOC replenishes the cages from which market-sized products have been harvested with spat sourced from hatcheries and/or wild collection.	Residents are aware of a time brought in spat and oysters sourced without a DFO permit. It was kept quiet, and no penalty was enforced by DFO if he removed the oysters. A warning should be on file. It's a common story locally that should be corroborated. If true, this event should be noted as an action of noncompliance and fed into this decision. It will only be a matter of time before Dermo and MSX arrive in Argyle. Residents don't want this, yet your approval decision will increase this chance and risk. And this record will show you ignored public concerns in the event disease arrives in Argyle NS.
3	With the recent call for proposals within the new Aquaculture Development Area (ADA), DOC is keen to apply for site AQ#8012, located directly north of the current lease #1400. This new site offers an immediate solution to DOC's ongoing supply and demand challenges.	8012 does not solve their supply and demand challenges. It just means the Deon's have a shorter trip to work from their house if they can get site 8012 approved. That's all this is about. And this application should not be entertained. NS DFA should be encouraging DOC to expand in non residential areas of Lobster Bay.
4	DOC has had to purchase market-sized products from other oyster producers to meet growing demand. This approach has become increasingly difficult, as most of the supply does not come from Nova Scotia, and higher prices offered by processors in other areas have made	

	it challenging to compete, especially when considering shipping costs.	
5	Securing AQ#8012 would be the missing piece in DOC's development puzzle, allowing for increased self-sufficiency and sustainability. The same type of OysterGro cages used in lease #1400 would be implemented in AQ#8012, leveraging years of experience and proven success in the Salt Bay area. The anchoring system, using trawler netting filled with rocks, would also remain consistent, providing stability and durability against tidal currents.	<p>Site 8012 is not the solution.</p> <p>8012 is in front of my house. I don't want an oyster farm in front of my house. Work with DoC to create a spot in a non-residential area.</p>
6	The decision to make the proposed area smaller than the Department of Aquaculture issued it is due to a few factors- Community engagement, stronger water currents, and finally, recreational boating. DOC spent time meeting with individuals from the community who shared similar views and collectively agreed that the remaining part of the proposed area will not work for suspended culture.	

7	DOC is confident that the existing team can efficiently handle the increased workload for a couple of years, as they are already adept at managing oysters purchased from other farmers.	This statement confirms that no extra jobs are created in this industry as falsely maintained by MODA and NSDFA.
8	DOC is a family-run business and has been established in the Lr. Eel Brook community since 1996. The DEons, along with their employees, are members of this community and the surrounding areas, fostering strong local ties.	


9	<p>At every opportunity, DOC prioritizes supporting local businesses over chain establishments. For instance, the recent installation of solar panels on the processing facility was undertaken by Corning Electric, a local electrical company. , the owner, grew up just down the road from DOC, highlighting the strong community connection. Another example is the procurement of materials for the OysterGro cages. DOC sourced the wire and materials from Wades Wire Trap, a local lobster trap manufacturer. During the winter months, when farm work is typically minimal, DOC’s employees construct the cages, ensuring year-round productivity and local employment. Additionally, recent renovations at DOC’s processing facility were completed by Garian Construction, a trusted local contractor. These examples underscore DOC’s dedication to supporting the local economy and fostering long-lasting relationships within the community.</p> <p>DOC is committed to the local community. Sustainable business practices and proactive responsiveness to community concerns underpin its operations. By supporting local businesses, meeting with the community members, and planning for future growth, DOC continues to uphold its values and contribute positively to the Argyle area</p>	<div></div> <div></div> <div></div> <div></div> <div></div>

10	DOC values the feedback and concerns of the community. With the announcement of the ADA, some community members who own and reside on waterfront land near Salt Bay expressed concerns about public engagement and potential impacts on recreational boating routes. In response, DOC adjusted the lease size within the application to exclude the area north of the tip of Roberts Island, alleviating concerns about navigation to and from Eel Lake through the Big Sluice.	 DOC is adjusting the lease size because they are concerned with “the stream” between Eel Lake Bridge and Big Sluice (between Gunning Island and Robert’s Island). I’ve already spoken to  and Colton about this and this is what we discussed. They can’t set gear and equipment in the stream due to the aggressive middle tides in both directions. That’s the intent.  
11	Furthermore, DOC will also collaborate closely with Transport Canada to establish sufficient waterway channels, ensuring that the public can navigate Salt Bay without disruption, similar to the channel currently running through Lease #1400.	As mentioned, DOC expands in a manner to discourage boating. There is no channel between Lwr. Eel Brook and Roberts Island any longer for boating. Their current farm has encroached over the high-water mark in the channel to the “Dyke” pushing boating dangerously close to ledges on the Roberts island side of the Bay. TC has refused to visit the area or consult with boaters. How can they make navigational decisions based on this application alone? They can’t and the wrong navigational decisions were made with the current site. The community now suffers for it, and a DFA approval for 1475 or 8012 will only cause more damage and ill will.
12	AQ#8012 is to utilize all of DOC’s current processing equipment and infrastructure. The floating workstation on Lease #1400 is well-equipped to handle the increased workload.	The floating station is an eyesore. Your approval brings it closer to my house. Put these farms in non residential areas where they should be.
14	DOC is committed to the local community. Sustainable business	

	<p>practices and proactive responsiveness to community concerns underpin its operations. By supporting local businesses, meeting with the community members, and planning for future growth, DOC continues to uphold its values and contribute positively to the Argyle area</p>	
15	<p>DOC is committed to the local community. Sustainable business practices and proactive responsiveness to community concerns underpin its operations. By supporting local businesses, meeting with the community members, and planning for future growth, DOC continues to uphold its values and contribute positively to the Argyle area.</p> <p>By leveraging this new area, DOC aims to further capitalize on the productive capacity of Salt Bay, ensuring continued growth and sustainability. The solid track record of lease #1400 provides a reliable benchmark, indicating that AQ#8012 will very likely yield similar positive results.</p>	<p>Oysters grow anywhere in Lobster Bay, which brings the core issue back to the forefront. Salt Bay is no different in water tests than Cat's Passe (Passe des Chats) as one example.</p> <p>In full bias, MoDA ad NS DFA staff fabricated and changed data to suit the fixing of desired outcomes and locations. Email evidence shows the data analysis did not present the desired outcome required to support Deon's preferred Salt Bay location. Several emails shows NS DFA employed data bias to achieve the desired outcome, and MoDA followed suit. (see Annex 5, Annex 6 and Annex 7)</p> <p>Why approve applications to sit next to residential areas when the bay is large enough to accommodate the desired expansion in non residential areas? DOC should have to travel to work if they want to expand vs allowing them to expand next to our houses in residential areas.</p> <p>Why are you allowing your regulatory authority to be influenced to accommodate someone who wants his</p>

		workplace near his house? It's ridiculous and it's outrageous that you are even allowing this process to get this far along.
16	If successful in acquiring AQ#8012, it will be a significant milestone for DOC. The existing infrastructure at Salt Bay is capable of handling increased output, beyond its current production levels. DOC's employees are highly experienced and possess in-depth knowledge of the Salt Bay area and its unique environmental conditions, ensuring seamless integration and operation.	The residents who live on Salt Bay are also highly experienced and possess in-depth knowledge of the Salt Bay area and its unique environmental conditions. The difference is these residents are driven by protecting the environment, boating, recreation, lobster fishing, rock weeding. And tourism. [REDACTED] f Deon's seeks expansion, then encourage them to boat to another area of the Bay that is non residential.
17	with three leases already under management and inventory software systems in place, DOC has demonstrated proficiency in efficiently running oyster farms. This expertise allows for optimized resource management and operational efficiency.	This so called "proficiency" has ruined Eel Lake and now the environmental bio fouling has begun in Salt Bay. Deon's doesn't care. The community does because we must live with NSDFA decisions perpetually. Recent water tests in Salt Bay are showing high counts of eColi. More Science and research is required which likely points to using other areas of the bay. Ego and greed do not equal expertise.
18	DOC's commitment to sustainability is reflected in its eco-friendly and reliable oyster farming practices. The proposed expansion will not only support market demand but also enable DOC to uphold its high standards of product quality. The expansion may also lead to job creation, with potential team growth in the coming years, while the existing skilled team will efficiently manage the new operations.	There has been no proof this industry increases jobs. No economic impact analysis has ever been performed. Why is NS DFA making decisions based on the biased opinion of an applicant and discouraging public sentiment at the same time. Deon's continues to operate across 3 leases using no more than 3 people. [REDACTED] Colton, and one hired hand. It's always been this way no matter what statements they make as they have in this application.
19	The company's deep-rooted community ties are a testament to its long-standing presence and transparency. The DEons, having been neighbors for over 40 years, contribute to a sense of trust and	[REDACTED]

	<p>familiarity within the community. DOC's operations are open and transparent, with members of the community having been invited in the past to experience oyster farming firsthand on boats in Eel Lake and Salt Bay.</p> <p>Oyster farming at DOC is not just a business; it's a sustainable and eco-friendly commitment to the environment and community. The company's legacy, expertise, and strategic vision position it well to meet future challenges and opportunities. By securing additional growing space, DOC can ensure a sustainable supply of high-quality oysters, fostering growth, and maintaining its reputation for years to come.</p>	
20	<p>With that said, DOC welcomes the opportunity to discuss this section in more detail. We believe in transparent communication and would be happy to sit down in person to provide further insights and address any questions.</p>	

		 <p>And no matter what any public comment says, we all know you will approve the DOC application. We stated this when you made your first press release announcing the pre-approved sites in Lobster Bay in 2024. (preapproved without public consultation).</p>
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The Optimum use of Marine Resources and Contribution of the proposed Operation to Community and Provincial Economic Development

For a residential area, the optimum use of marine resources would first start with balancing the needs of industry (50% stakeholder) with residents (50% stakeholder) who live and work along the coast. A balanced decision must be achieved. Yet it can be achieved. On the industry side, for Lobster Bay that would include Aquaculture, Lobster Fishing, Rock Weeding, and Tourism.

At most, the Aquaculture industry could argue they have a 25% share of industry influence and interests across these 4 main industries, but due to the sheer size and

scale of the Lobster (1Billion) and Tourism industries (2Billion), the aquaculture industry at 120 Million is dwarfed in comparison. While a cost benefit or economic impact analysis has never been performed for ADA outside of accepting [REDACTED] the Aquaculture industry has a 5.4% share in influence on only the industry side of the stakeholder balance. This drops to 2.7% stakeholder influence when deciding upon the optimum use of Marine Resources when the public is offered half of marine usage which is understandable and fair in a residential area like Salt Bay.

Stakeholders			
Shareholders	Size	Industry Share	Share of Optimum Use of Marine Resources
Toursim Industry	\$ 2,000,000,000	89.3%	44.6%
Lobster Industry	\$ 1,000,000,000	44.6%	22.3%
Aquaculture Industry	\$ 120,000,000	5.4%	2.7%
RockWeeding Industry	\$ 20,000,000	0.9%	0.4%
Total	\$ 2,240,000,000	100.0%	50.0%
Public			50%

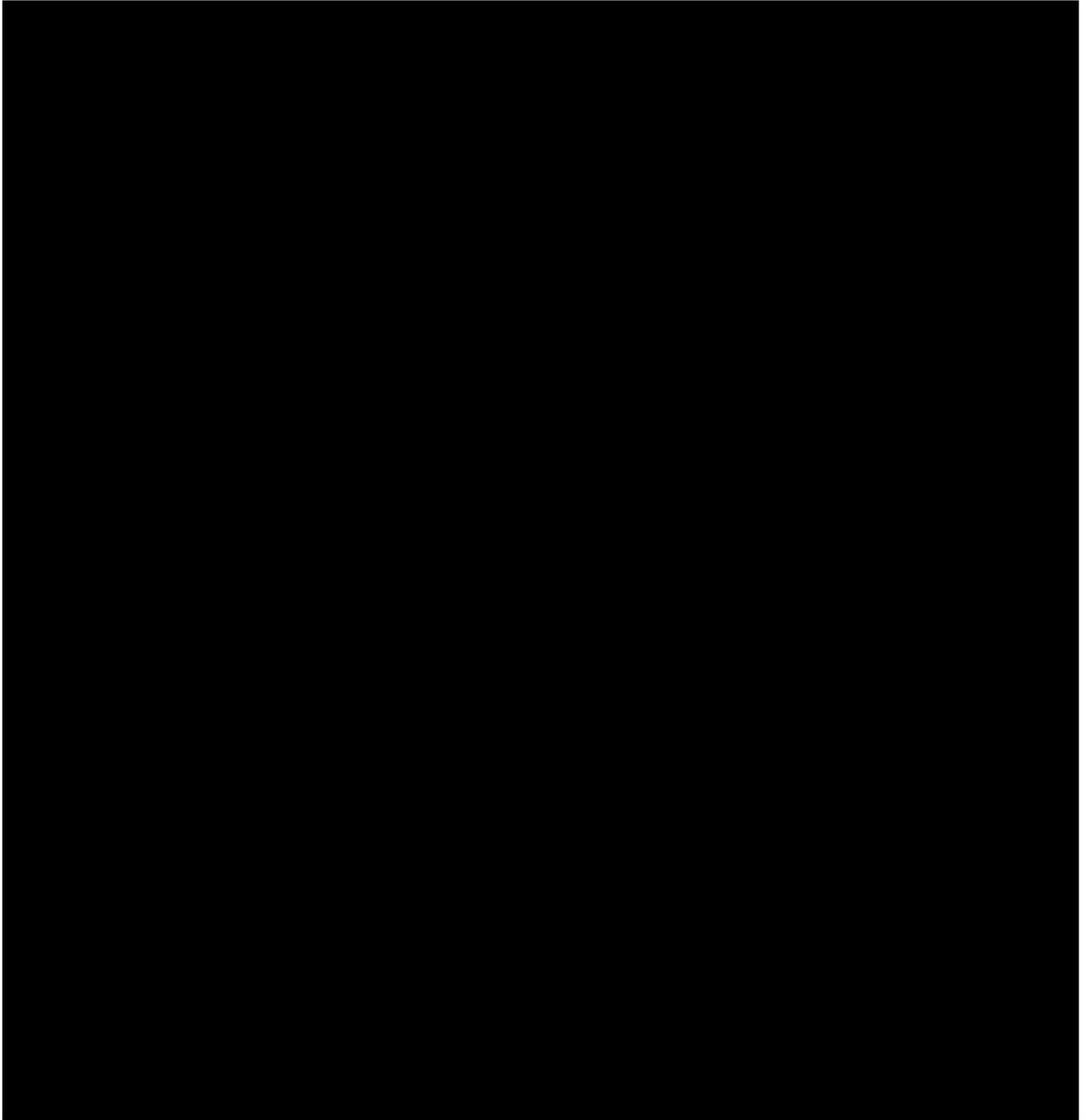
As a result, the public needs a much larger influence as a stakeholder if NS DFA is going to award site locations in residential areas. Even if placed in non residential areas, the aquaculture industry influence on the optimum use of maritime resources remains insignificant. I assume this is why no economic impact analysis has been performed. AANS nor Deon's would like what it says, nor would it be expedient to their desired outcome.

Fishery Activities in the Public Waters Surrounding the proposed Aquacultural Operation

Local inshore Lobster Fisherman set traps in Salt Bay during lobster season. This has been voiced at several recent council meeting s but undocumented by NS DFA because it would not be expedient to the desired outcome of AANS and DOC. More public and industry consultation is required and should be performed, especially when the NS Ombudsman report will define the public consultation performed as insignificant. No real public representation or residents attended 2 sessions that were kept quiet in Argyle during the Covid Pandemic. Only aquaculture farmers and their families attended who unsurprisingly unanimously endorsed the preapproved locations for site leases which were not offered to the "real" public until NS DFA "pre-approved" them. It was very unfair and non transparent, and this needs to be fixed.

Environmental Considerations

While DOC believes this project has been designed to ensure minimal environmental impact, I am very concerned with the high coliform count in Salt Bay where the current DOC farm is. Is this caused by the farm itself, or is it caused by other factors which means DOC is growing oysters in an area that is 7 times the acceptable limit for swimming let alone eating. See the certificate of analysis below.



The Other Users of the Public Waters Surrounding the Proposed Aquacultural Operation, and the Public Right of Navigation

Salt Bay is a location between Eel Lake, Eel Brook, Glenwood, Robert's Island, and Rocco Point. It is a location named in the Canadian Navigable Waters Act because it is a navigable waterway charted by the Canadian Hydrographic Service under Chart # 4244.

The area is a residential area with approximately 100 houses dotting the shoreline, many with boats for recreational purposes. This area has 3 public wharves (see attached map image) located in Rocco Point, Eel Brook Bridge, and Lwr Eel Brook (where Deons Oyster Company (DOC) accesses Salt Bay across the street from their house). All wharves are deemed for public use, and the Municipality has used taxpayer dollars to perform upgrades. A Public Wharf sign will be placed at the Lower Eel Brook Wharf on Beech Lane due to Deon's self declaration that the wharf is for their sole purpose and use. This has been requested by the community to clarify its use and intent.

Approximately 11 Private wharves line the shoreline in this area. The area is used exclusively for boating, swimming, recreation, canoeing, kayaking, fishing, lobstering, rock weeding, and beachcombing. Seasonal use dictates higher traffic in the summer months.

Rerouting of Boating Traffic

As per the diagram and map provided, please note that if site 1475 or 8012 is approved, all boating traffic will be rerouted out of Big Sluice and into Little Sluice in front of my house. Little Sluice is the most treacherous waterway in Salt Bay with rocks, ledges, and rapids at mid tide (ebb and flood) in a very narrow channel between the shoreline of Gunning Island and my property at [REDACTED]. The channel is very narrow, and boats have hit the rocks over the years losing lower units on outboards, and damaging hulls. The channel can only be navigated between mid and high tide (6-12 ').

I also do not want an increase of traffic between Eel Lake (Eel Brook Bridge and the open sea) taking this narrow channel in front of my house due to increased noise, pollution, risk to boating accidents and emergencies, and invasion to my privacy. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Instead, we need NS DFA and TC Navigable Waters to encourage DOC to expand their aquaculture sites in non residential areas of Lobster Bay. [REDACTED]

[REDACTED]

Issues and Concerns with past TC Navigable Waters Decisions

[REDACTED]

[REDACTED]

[REDACTED]

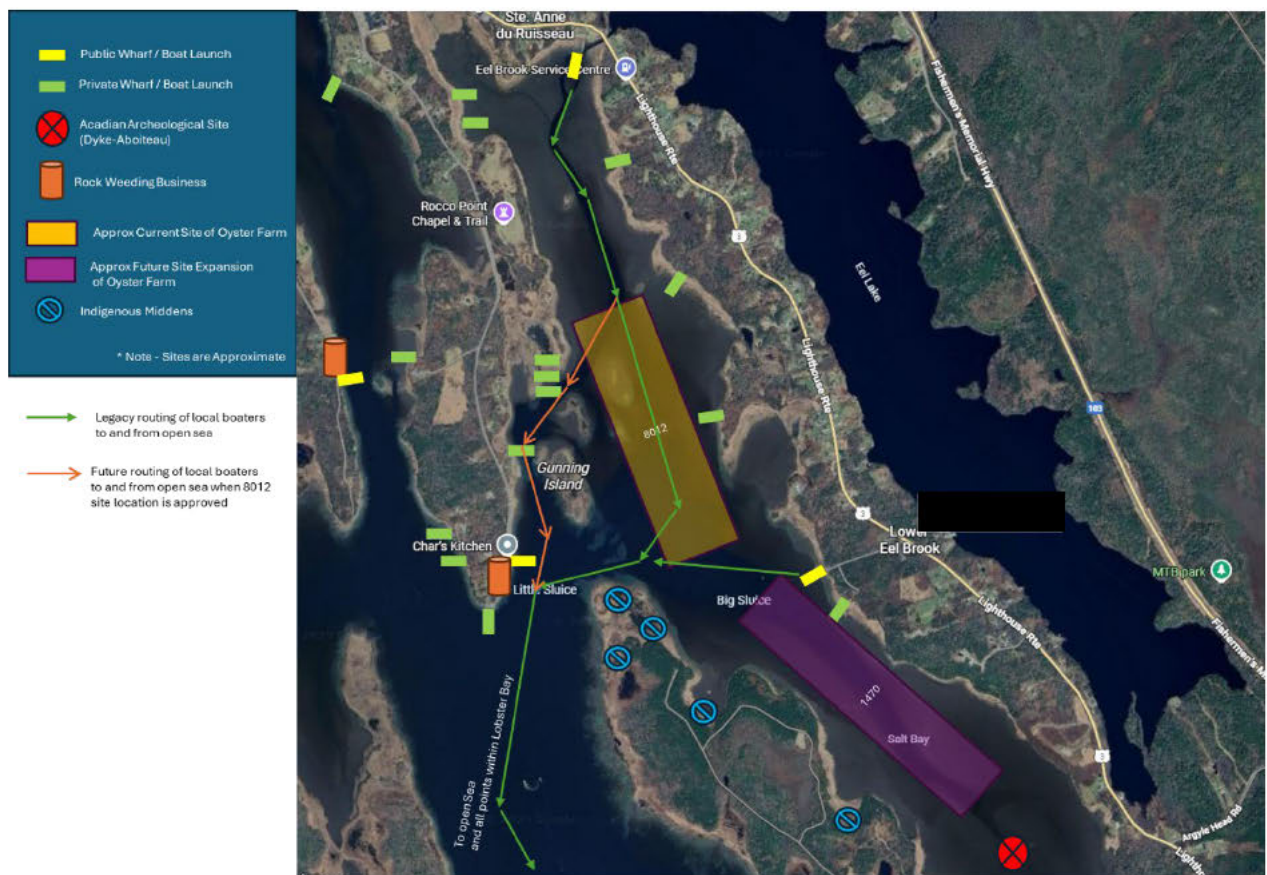
Other Issues and concerns with the NPP application

[REDACTED]

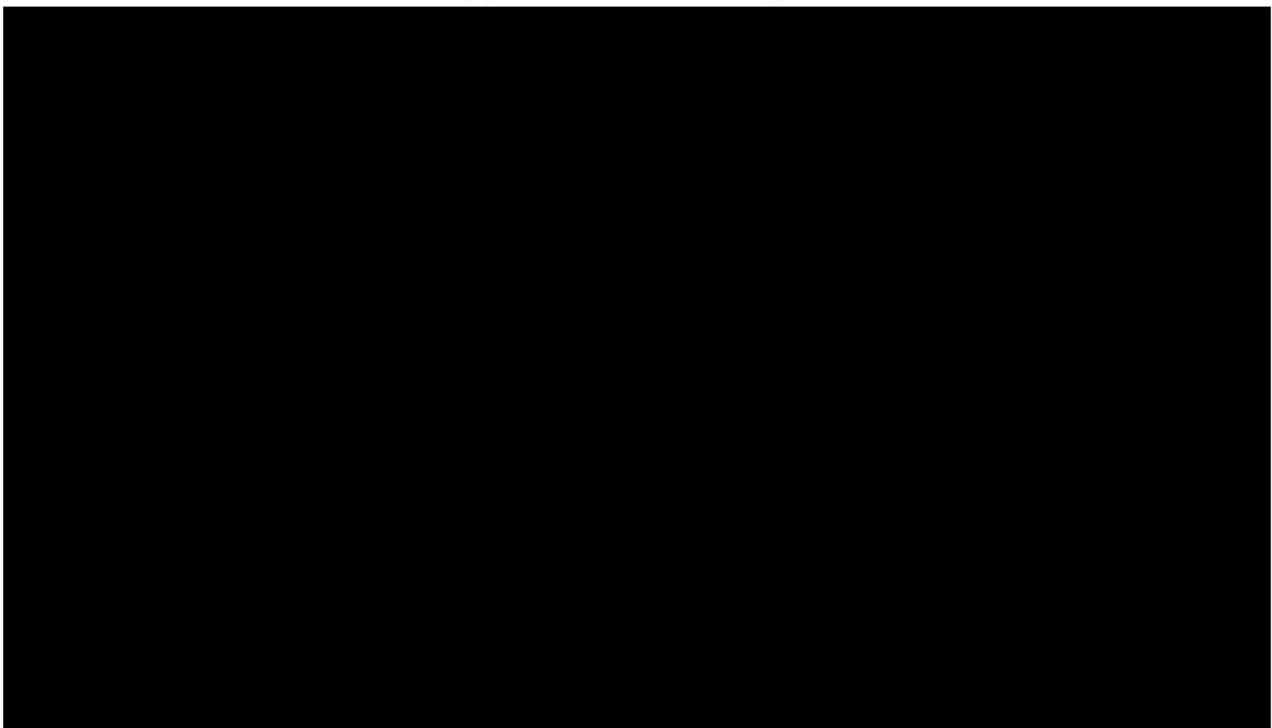
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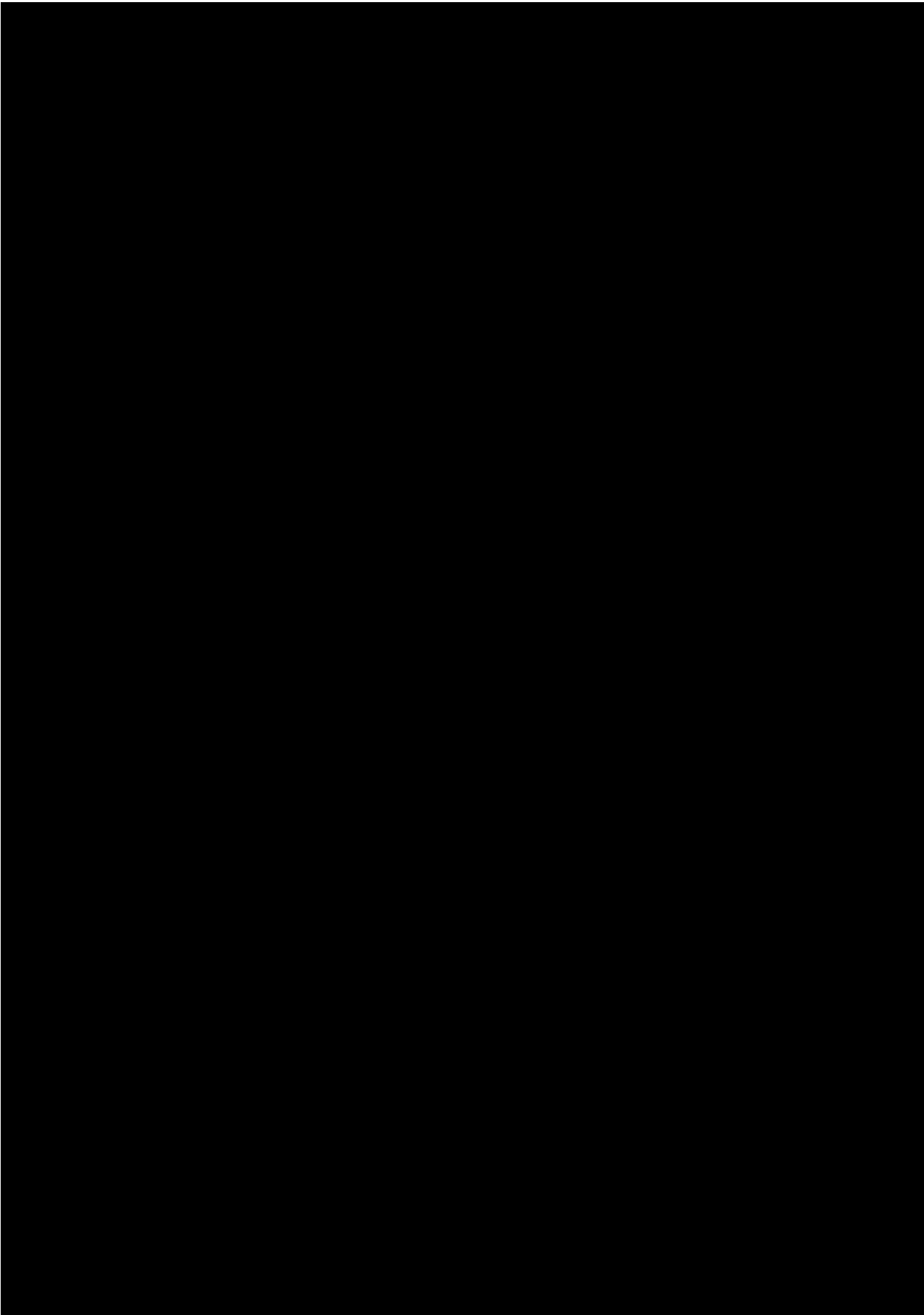
- [REDACTED]

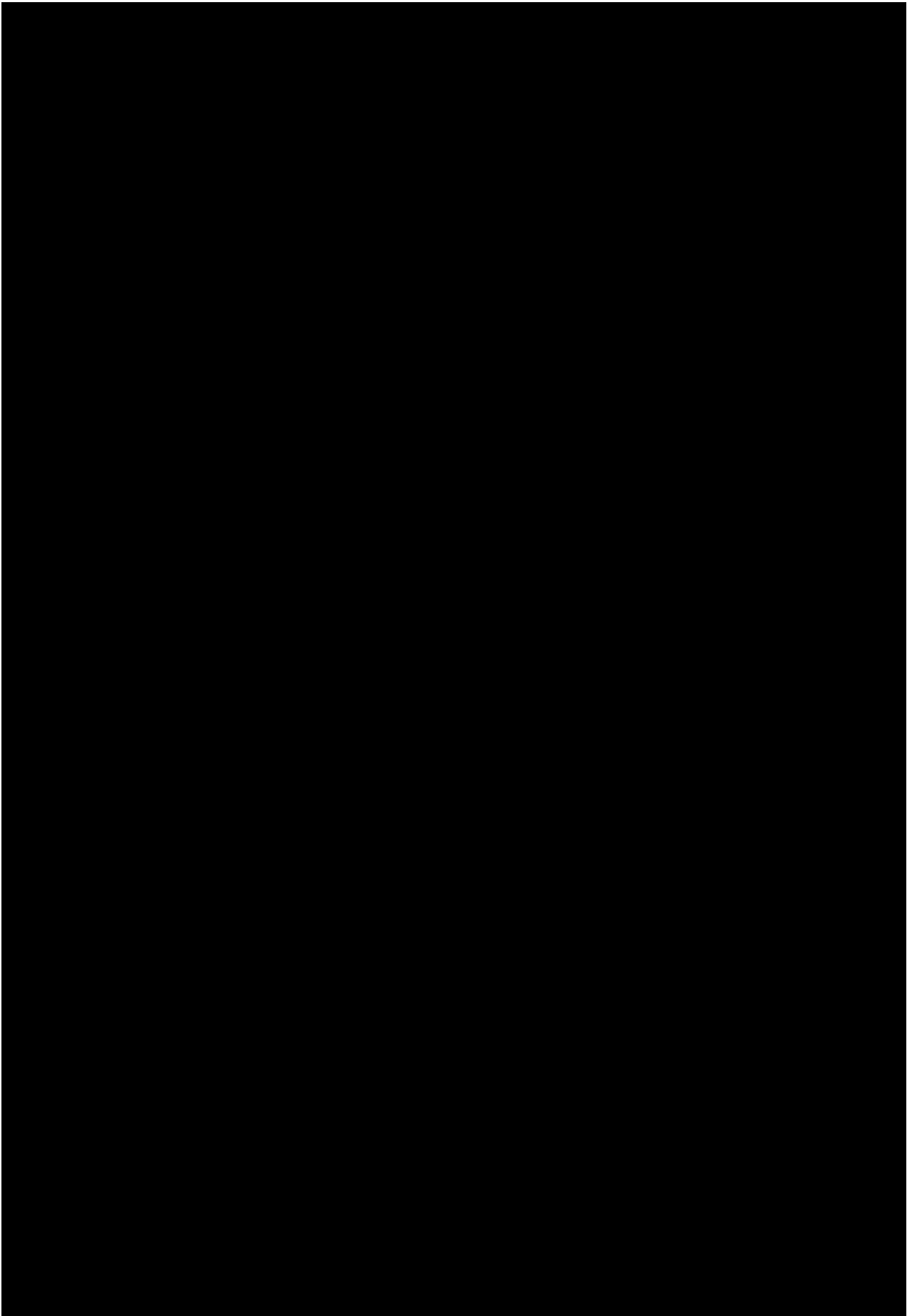
A Map and Key Locations with Current and Future Traffic Patterns

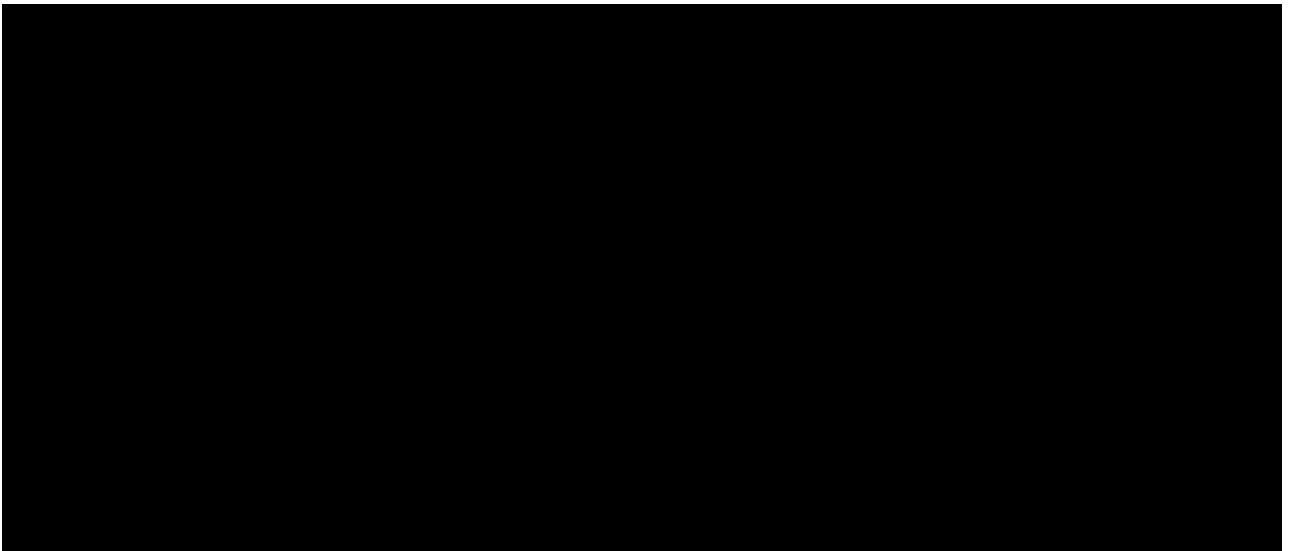


Comments on the DOC NPP Application with Transport Canada



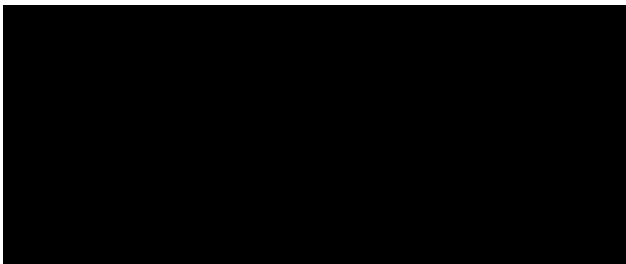






Thank you for the opportunity to provide public comments to factor into your determination of this NPP application. Please feel free to contact me directly with any questions or clarifications.

Sincerely,



Chris Thibedeau,



Ste. Anne du Ruisseau, NS,



Phone : 

WhatsApp 

Email 