



**Oral Presentation on April 9, 2019 to the
Fisheries and Oceans Standing Committee, Bill C-68, An Act to Amend the Fisheries Act**

Topic: The Negative Environmental Impact of Open Net Pen Freshwater Aquaculture Operations in Georgian Bay and the North Channel of Lake Huron, Ontario

Background on the Georgian Bay Association (GBA)

For over 100 years the Georgian Bay Association (GBA) has advocated on behalf of the eastern and northern shores of Georgian Bay and the North Channel of Lake Huron. We now represent around 3,000 families and reach at least 18,000 individuals.

GBA Position on Aquaculture in Canada

GBA supports a strong, vibrant, but sustainable, aquaculture industry in Canada. Our evidence provided will prove to the committee that the open net pen freshwater aquaculture operations in Georgian Bay and the North Channel of Lake Huron (which I will refer to as “open net fish farms”) are not sustainable, and should not be permitted, particularly in the context of the Canada/US Great Lakes Water Quality Agreement.

GBA Position on Bill C-68

Bill C-68 is a major positive step forward to reinstating the protections contained in the 2007 Fisheries Act for wild fisheries, the aquatic environment and fish habitat throughout Canada. Therefore, GBA is fully supportive of the contents and intent of the Bill.

Negative environmental impacts of open net fish farms

The primary purpose of our submission is to clearly demonstrate to the Senate Committee how the open net fish farms damage the aquatic environment.

GBA maintains that the open net fish farms pollute and degrade the quality of the waters and sediment by depositing fish feces, excess feed, pharmaceuticals and chemicals used to clean the nets into the water and under the cages. This accumulates over time, and turns the naturally high oxygen, low nutrient, oligotrophic water eutrophic and, consequently, uninhabitable for wild fish. These operations must, therefore, be moved on to land into sustainable, closed containment systems to protect the native fish and their habitat in the ecologically significant areas of Georgian Bay and the North Channel.

Accordingly, it is evident that open net fish farms are not being properly managed and controlled. We would therefore ask the Committee to recommend that the Department of Fisheries and Oceans and Environment Canada take back their lead management role of these operations.

Examples of Harm caused by open net fish farms

To date two open net fish farms at LaCloche Channel and Grassy Narrows, near Manitoulin Island have been closed, but continue to cause damage to the aquatic ecosystem.

This satellite image was provided by the then Environmental Commissioner of Ontario and shows La Cloche Channel 10 years after the open net fish farm cages were removed.

The methane created by the fish manure in the sediment below the cage sites is still sufficient to melt the ice above where the cages used to be.



A third open net fish farm at **Lake Wolsey** (an embayment of the North Channel), operated by Mike Meeker who has appeared before this Committee in the past, has been creating annual toxic blue-green algae blooms since 2015, and should also be closed down.

We understand that this farm attempted to sell contaminated fish grown at this facility, but they had to be disposed of following positive testing for toxins - a risk to public health and safety.

The rest of the aquaculture industry would like to see this facility closed down, as it is giving them a bad name, and the potential health and safety issues are a threat to their reputation.

This picture, taken by K. Hille in Sept 2006, shows the aquaculture cage and phytoplankton bloom at Lake Wolsey



Other Negative Environmental Impacts of Open Net Fish Farms include:

- the release of high quantities of antibiotics and other chemo-therapeutants;
- assisting the growth of invasive species such as zebra and quagga mussels (which are a major threat to wild fish stocks and their habitat in the Great Lakes);
- numerous and ongoing fish escapes from torn nets caused by vandalism, shifting ice conditions and violent storms (whose frequency and ferocity now increase annually due to Climate Change impacts) - these cultured fish, genetically selected to be voracious eaters, then compete with native fish for food and habitat.

US decision not to allow open net fish farms

The State of Michigan concluded that open net fish farms pose too great a risk to water quality and made no financial sense (to the government). As a result, no US Great Lakes state allows open net fish farms.

Applying the Precautionary Principle

We applaud the return of the precautionary principle within Bill C-68, but it must be applied. Why take the risk of polluting the water when fully sustainable land-based alternatives for growing trout are available to the industry?

Recommended additions to improve Bill C-68

We recommend including two additional provisions in the Bill:

- A. Restore the environmental assessment triggers to those previously contained in Section 36 of the Act prior to 2012, and include non-point source phosphorous loads as a HADD in Section 35.***
- B. Add a clause concerning Great Lakes protection to ensure continued remediation and reductions in phosphorous loading. This clause should therefore specify compliance with the Canada – U.S. Great Lakes Water Quality Agreement; the Ontario Great Lakes Strategy; the Great Lakes Protection Act; The Canada - Ontario Great Lakes Agreement; and the Lake Huron Lakewide Action and Management Plans.***

In Closing

We hope that the evidence we have provided will lead you to consider our concerns, recommending and supporting the action suggested once Bill C-68 is enacted, and incorporating the two amendments to the Act outlined above.