memo To GBA Aquaculture Committee

to: GBA Aquaculture Committee

from: Jim Bolton

subject: Comments on DFO’s National AQ Strategic Action Plan Meeting – September 24, 2009 Sudbury

date: 3/30/2019

Claudette,

I have extracted and simplified relevant content below. My intention is to flush through the sheaf, simplify the issues at hand, and arm you with clear powerful statements that you can fire off when opportunity arises.

In your mind’s eye keep your role at this conference crystal clear - it will help with the natural anxiety that you may feel. Your role as I perceive it:

*You are the voice of all Ontario citizens who are concerned about the exploitation of clean fresh water to support an agri-food industry. You are voicing concerns about conducting an industrial activity inside a water body, and using dilution as the solution to pollution. You question the fairness of granting one resource user free use of public space, free use of water, and virtually ignoring nutrient discharge regulations that all other agri-food industries are subject to. And you believe in the value of clean water and in preserving the extremely rare oligotrophic condition of Georgian Bay for the enjoyment of future generations.*

Envision your very important role and keep it close to you for security. Stay focused on our consistent message:

1. We are focusing on **freshwater** aspects of aquaculture only. The **freshwater** system is very different than the **marine** system, and therefore must afford its own regulatory framework.
2. We believe it is irresponsible to conduct industrial activities inside **freshwater bodies.**
3. It is currently illegal and inappropriate to allow untreated manure and industrial byproducts to be released into a water body… dilution is NOT the solution to pollution.
4. We do not presume to dictate farming practices; however it is not acceptable to grant an agri-food industry free use of public space, and free use of water to dilute industrial pollution and byproducts. To this end we insist that the industry be conducted on land and under well-established legal instruments that protects property and the environment. Therefore we object to cage aquaculture in freshwater bodies.
5. We do not want to disrupt existing entrepreneurs who are operating inside the freshwater body – on licenses that were granted to them without public consultation (i.e. before broad public debate, consensus and zoning). However we are committed to their non-disruptive migration to land where they can afford all the protection and rights already established there.

Claudette, **do not** fall in to the trap that every one of our concerns be scientifically defendable, or that we must propose solutions to our own concerns, or be ashamed that we are existing legitimate users of the water resource, or feel that we have to soften our concerns under the pretense of ‘compromise’. You have the **right** to state your concerns as they are, and government has the **obligation** to give them proper consideration. KEEP YOUR MESSAGE SIMPLE.

**COMMENTS ON THE DFO AGENDA**

**Backgrounder:** “Canada supports the sustainable development of aquaculture. Federal and provincial governments recognize aquaculture as a **legitimate use of Canadian waters** ….”

1. GBA objects to this statement. **Cage** Aquaculture in fresh water is unprecedented. There is no existing legal framework that grants one user exclusive rights to a water column and allowing that user to use the water column as pollution sink.
2. There has been no broad public debate allowing any one user exclusive rights over a water body, and the right to use that water body as a pollution sink. Until this debate has occurred, and broad consensus reached, DFO cannot state that cage aquaculture is a legitimate water user.
3. The aquaculture industry is a legitimate water user in as much as they comply with land zoning and water use permitting that every other industrial water user must comply with.

**New Sustainable Aquaculture Program initiative.**

GBA requests that this initiative include a fifth objective specifically addressing the long term health and protection of the natural environment.

**DFO Strategic Question: Vision**

1. GBA envisions a robust aquaculture industry that is land based. A land based industry is governed by a well established framework of legal instruments that allows the aquaculture industry to conduct business and utilize natural resources in an acceptable fashion. Furthermore a land based model offers many benefits to the aquaculture operation, such as reduced risk from the elements and biosecurity.
2. A respectful aquaculture industry does not discharge untreated manure into water bodies, whilst their terrestrial counterparts are not allowed to.

**DFO Strategic Question: Projections**

GBA hopes that an economically profitable land based aquaculture industry develops to meet the growing needs for seafood, but in a manner where pollution discharge is regulated and controlled like all other polluting activities

**DFO Discussion: Environmental Management of Aquaculture**

1. Fundamental to the management of a freshwater environment is minimizing the release of pollution and nutrients. Aquaculture operations must not be allowed to discharge raw manure and industrial byproducts into the water body. If DFO is genuinely concerned with environmental management, then there will be no cavalier attitude towards unmonitored and uncontrolled release of manure.
2. The concept of ‘keeping clean water clean’ must be adhered to, because once lake degradation is observed, it is technically and economically unfeasible to return it to its pristine condition.

**DFO Strategic Question: Environmental Management of Aquaculture**

See above

**DFO Strategic Question: Introductions and transfers of Aquatic Organisms**

**DFO Strategy Question: Access to Wild Aquatic Resources for Aquaculture Purposes**

**DFO Strategic Question: Canadian Shellfish Sanitation Program**

Not relevant

**DFO Strategy Question: Regulatory and Management Regimes**

Freshwater aquaculture requires its **own regulatory regime**. Management practices developed in marine environments may have serious negative consequences in freshwater bodies – flushing and assimilation capacity are very different.

**DFO Discussion: Sustainability, Competitiveness, Investment and Innovation**

1. Sustainability from our perspective is keeping clean water clean. In keeping with Canadian obligations in the Great Lakes Water Quality Agreement, GBA is striving to maintain the oligotrophic nature of Georgian Bay. The nutrient load from Cage Aquaculture in Georgian Bay is environmentally unsustainable.
2. Investment capital will naturally follow good ideas. However there must be clear title to business assets and a predictable unencumbered regulatory framework. This exists immediately in land based farming operation, and will never exist in cage aquaculture.
3. Canada could become innovation leaders in the area of land base aquaculture.

**DFO Strategic Question: Innovation – Fish Health Management**

Land based aquaculture offers a degree of control that could greatly improve fish health and quality.

**DFO Strategic Question: Innovating – Aquatic Invasive Species**

Land based aquaculture provides protection from invasive species and allows for the cultivation of exotic – potentially invasive - species.

**DFO Discussion: Innovation - Emerging Production Technologies and Systems**

Land based aquaculture is the only way for the industry to reach its full potential. And further thought exercise leads to the inevitable conclusion that the only way for aquaculture to truly meet food requirements in the future is to treat and reuse water. (Gintas I am aware that you are cringing now.)

**DFO Strategic Question: Innovation – Emerging Production Technologies**

Invite the DFO to take their head out of the ocean for a moment and attend the Eighth International Conference on Recirculating Aquaculture.

**DFO Discussion: Industry Diversification/Alternative Species**

See comment above.

**DFO Strategic Question: Industry Diversification/Alternative Species**

See two comments above.

**DFO Discussion: Risk Management & Access to Financing**

1. Land base increases control over variables thus reduces risk.
2. Financing will flood to good ideas. Fix the main financing flaw of aquaculture by building a land based model.

**DFO Strategic Question: Risk Management**

 See Above

**DFO Discussion: Infrastructure**

Very little traditional infrastructure is required if the land based model is implemented.

**DFO Strategic Question: Infrastructure**

 See above

**DFO Discussion: Market Access & Certification**

**DFO Strategic Question: Market Access & Certification**

 Not relevant

**DFO Discussion: Social License & Reporting**

1. For the record GBA does NOT acknowledge any social license to build a freshwater aquaculture industry using cage farming techniques.
2. Canadians have not accepted the fundamental assumption that government can carve up water rights, granting individuals exclusive rights to conduct industrial activity inside the water lot and use the water as a mixing lot to dilute the pollution generated during the activity
3. Canadians have not broadly agreed to exclusively subsidize the cage aquaculture industry with free space, free water and free pollution cleanup.
4. Social license will not be granted until this activity is debated in a public and open fashion, and consensus achieved.
5. Furthermore Canadian’s have an obligation to consult with their American partners - who do not allow such cage farming practices – because water is a jointly shared resource, and you can’t do something on one side of a lake without affecting the other side.
6. DFO has not earned our trust when they make assurances of “environmental management”. Furthermore, DFO is in a perpetual conflict of interest being both a promoter and regulator of an industry. This problem must be fixed immediately and the promotion of Aquaculture through the National Strategic Action plan must be handled by a more suitable organization – i.e. Industry Canada – and DFO should focus exclusively on their primary mandate, that being the management of natural fisheries.

**DFO Strategic Question: Performance Monitoring & Management**

Performance monitoring must include total pollution discharge to the environment. Public has the right to know complete environmental impact.

**DFO Discussion: Next Steps**

Step one is to revisit the fundamental assumptions underlying freshwater cage aquaculture through an open public debate.