**NOTES from the Georgian Bay Association regarding the 2011-2015 Federal National Aquaculture Strategic Action Plan Initiative (NASAPI): Freshwater Plan,**

http://www.dfo-mpo.gc.ca/aquaculture/lib-bib/nasapi-inpasa/freshwater-eauxdouces-eng.pdf

The Georgian Bay Association (GBA) has tried to influence this federal Plan by partaking in regional meetings held by DFO and writing to the Department of Fisheries and Oceans. Unfortunately, the Strategy for growing the industry has been passed and approved by the Canadian Council of Fisheries and Aquaculture Ministers (CCFAM - the provincial Ministers who oversee the industry and regulation) as of November 10, 2010.

It does not seem that we have been successful in influencing the government to support closed contained movement in any serious way. (We suspect the entries in the PLAN on Emerging Technologies were merely to acknowledge such technologies because the initiative to promote it just doesn’t seem to be there).

Pages 2 to 3 - **Environmental Management**

This section looks to be totally designed for the cage aquaculture industry although EM- 3 and EM - 4 speak of "all freshwater" aquaculture

* Re. EM-2 sounds suspect to me, for it speaks of identifying "mechanisms" to expand the industry "without contravening' the s.35 of the Fisheries Act. Here is where GBA fears that the newly Proposed Aquaculture Activities Regulation (pertaining to Sections 35 and 36 of the Fisheries Act) will exempt Great Lakes cage aquaculture from the Fisheries Act for cage aquaculture will be authorized as as prescribed activities within the regulations when the regulatory conditions, (which are provincially mandated by MNR), are met.
* Re. EM-4 Again, GBA is suspect of the wording here. In year 2 through Year 5 they plan is to develop a "class-type environmental assessment for site applications and environmental reviews " and we suspect it will continue to be like the one currently used in the MNR's Class EA loophole that classifies existing operations as "of low risk" environmentally and of "low public concern" – which is not true.

Page 4 - **Navigable Waters Act**

The second paragraph here seems to be enabling expansion of the industry further into the public domain and give longer tenures to operators. It speaks of "leveling the playing field for producers" yet - how are the land-based and contained system producers (who cause less environmental concern) considered here?

Page 5 - **On-Site Inspection**

We commend the plan for more consistent inspection plans

Page 6 - **Other Regulatory Governance**

We commend the plan in its view of necessary review of rights, privileges, and obligations.

Page 7 - **Public Engagement and Communications**

We commend the annual progress report (DFO and Stats Canada)

Page 9 - **First Nations and other Aboriginal Groups**

The second opening paragraph speaks of "misinformation regarding environmental effects" influencing aboriginal opinion - but to me this sounds like a NOAA statement entered here. We note that the plans for First Nations does not begin until year 3 and can assume, after seeing the stipulation for AEA -2, "Help develop the capacity of First Nation and aboriginal communities to provide meaningful input into the aquaculture site review and assessment process” - that this Plan is assuming that the FN peoples will look to cage aquaculture as the rearing methods of choice! Quite presumptuous!

Page 11 - **Productivity and Capacity: Fish health** (FH)

* Re FH-3 Is this not another plan to "get around" s.35 and s. 36 of the Fisheries Act in support of the use of drug and pest control products for broodstock without consideration for the effects on the wild from open cage systems? Indeed, the aforementioned newly Proposed Aquaculture Activities Regulations seems to suggest this. There are closed systems of aquaculture that do not require the use of drugs or pesticides to keep the brood stock from infections.

Page 12 - **Aquatic Invasive Species** (AIS)

* Re. AIS -1 our comment is as above, but now includes the use of chemicals, anesthetics and disinfectants as well! Again, certain closed systems will eliminate any matters of concerns about invasive species and need to use of chemicals.

Page 13-14 - **Emerging technologies** (ET)

* ET - 2 is vague and does not indicate that the initiatives ought to move towards either land-based, floating closed-contained, or RAS systems
* ET-3 is equally vague when it speaks of "research" for closed containment, identifying "risk" for RAS and promoting "benchmarking" (see the definition for this in Footnote 7 on p. 18). \*\*\*It is interesting to note that in the west coast finfish Plan, there are 5 bullets in this same section - 3 match the freshwater plan - but the freshwater plan excludes these two listed only for the marine finfish Plan: - Develop a comprehensive performance monitoring and management program to establish appropriate metrics for objective evaluation of CCA (closed systems) and RAS

- Invest in market studies to identify niche market opportunities specifically for products of CCA and RAS

Again, it seems all too clear that the issue of advancing towards closed contained systems for freshwater is a "do not resuscitate " issue as shown by the void in the freshwater Plan as compared to the push for CCA on the west coast where the public has successfully made their rights and opinions heard by our government!

* ET-4 . By use of the proactive terms, "promote domestic use and export opportunities", and "establish a pilot program”, it seems that investment of resources into off-shore cage aquaculture systems will trump any investment for closed contained or land-based systems!

Page 16 - 17. **Alternative Species Development**

* Here the Plan recognizes the current fiscal challenge but none-the-less are putting plans in place to somehow find the funds (within the 5 and 10 years projections) to support research and pilot projects for other freshwater species, namely, Arctic Char, Sturgeon, and Walleye - which will most likely occur in cage aquaculture systems. BUT there is no special mention to exploring fish species that can most suitably be reared in closed contained systems.

Page 17 to 18 **Risk Management and Access to Financing** (FIN)

* basically the goal is to lessen the appearance of risk in the industry so as to improve public confidence and willingness to both insure against loss and finance new projects
* re FIN - 1 We give credit for the mention of third party audits here in bullet 3 but we toss the warning flag up for the mention of the so-called "smart regulation" (which is defined in the footnote on page 19) Again - we believe we must watch for loopholes being created by use of these mechanisms as a means to get around s.35 and s.36 of the Fisheries Act.  We are also suspect of the certification process (MC-1 last bullet p.20) where government sees the "potential to use certification as a streamlining tool in support of 'smart regulation, an aptly labeled terminology to cover all bases?
* FIN-3 again there is mention here of increasing both the duration and the transferability of the Land Use Permits and licences. This would not be advisable in the Great Lakes with its changing issues (water levels, climate change, pharmaceuticals accumulating in the water supply,) and evermore invasive species, etc.

Page 20 - **Labour and Skills Development**

* Intentional oversight? There is no mention of how closed contained, or RAS systems could be a bigger industry than cage aquaculture with great potential for promoting and attracting skilled labour on a continuous basis due to more frequent harvest possibilities (due to climate control techniques) and other skill sets required by the technology of these more advanced systems of aquaculture.