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January 17, 2022

Via email

The Honourable Joyce Murray,
Minister of Fisheries and Oceans and Canada Coast Guard

The Honourable Steven Guilbeault,
Minister of Environment and Climate Change Canada

Re: Open Net-Pen Aquaculture, Lake Huron, Ontario

Dear Ministers Murray and Guilbeault,

The Georgian Bay Association congratulates you on your appointments by the Prime Minister to, among other things, manage sustainable marine and freshwater ecosystems and partnering to halt and reverse nature loss of the Great Lakes. We are confident that your impressive backgrounds and dedication to environmental stewardship will yield successful outcomes.

We are writing to alert you to an issue of grave concern that requires a coordinated effort by your respective Departments and the Ontario government regarding oversight of open net-pen (cage) aquaculture operations in Georgian Bay.

The Georgian Bay Association (GBA) is an umbrella organization for 18 community associations along the east and northern shores of Georgian Bay. We have been advocating on behalf of our members for over 100 years and estimate that we reach and influence around 18,000 residents of the Georgian Bay region. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

We have been actively working with government on aquaculture issues for the past 23 years. Our Aquaculture Committee consists of a dedicated group of professionals, including a fisheries/aquatic biologist (PhD), water quality scientist (PhD); and a professional engineer (P.Eng) who specializes in water treatment processes, including Recirculating Aquaculture Systems (RAS), technology and commercialization. All have focused on the effects of aquaculture on the freshwater environment in their respective careers.

These specialists volunteer their time to review studies and give us their expert advice on how to protect the public waters of Georgian Bay, which includes a UNESCO Biosphere Reserve where commercial fish farms have been expanding their operations in the open waters. We then provide this advice to government and industry.

Of particular concern to Canadians and Americans alike is the conservation of the Great Lakes. The bi-national *Great Lakes Water Quality Agreement* guides Canada and the United States on reducing nutrient and chemical loading and other threats to our shared waters. In addition, the Ontario government's *Great Lakes Protection Act* and various government and NGO funded initiatives are dedicated to restoring the water quality of the Great Lakes.

Much to our surprise, both your Departments have assigned their former responsibilities for freshwater aquaculture management, and the associated protection of water quality in the Great Lakes, to the Government of Ontario, even though these aquaculture operations impact boundary waters. We draw your attention to the Memorandum of Understanding (MoU) between Fisheries and Oceans Canada and Ontario's Ministry of Northern Development, Mines, Natural Resources and Forestry signed in 2011.

Open net-pen aquaculture is very active in northern Lake Huron, particularly because Ontario's current "Open for Business" approach is encouraging the industry to move towards significant growth in these finite and fragile waters. We believe that the province of Ontario is overseeing the industry in a way that appears to lack a long-range environmental sustainability strategy and allows exclusive rights to international waters for "assimilation" of fish farm waste and related deleterious substances. The Ontario open net-pen fish farm industry, which constitutes the majority of commercial aquaculture production in the province, is seemingly exempt from federal oversight. For further information on our concerns, please see:

<https://georgianbay.ca/fisheries/cage-aquaculture-issue/cage-aquaculture-submissions/>

Neither Quebec nor the eight U.S. States that border the Great Lakes/St. Lawrence River System permit open net-pen aquaculture in these waters. In fact, the State of Michigan released a report "*Regarding Net-pen Aquaculture in the Great Lakes*", on March 9, 2016, which states, "*Given the ecological and environmental risks and uncertainties, as pointed out by the Science Panel and with further information provided through public input, commercial net-pen aquaculture would pose significant risks to fishery management and other types of recreation and tourism.*"

We recommend four immediate actions for your respective Departments to consider:

1. That the MoU with the Ontario government be updated, and all stakeholders, including Indigenous Communities (stakeholders?) within the operating zones of the fish farms (some of whom are operators themselves) and the GBA, be involved in the ongoing oversight of the industry under a more modern, transparent, sustainable, and mutually effective oversight regime.

2. That support is provided to the aquaculture industry to encourage migration to sustainable, land-based locations/operations.
3. That the federal Aquaculture Act being developed include a separate section on freshwater aquaculture, and specifically Great Lakes freshwater aquaculture, and that the Act reference the other legislation and bi-national agreements that govern water quality and protection of the Great Lakes.
4. That these considerations be noted by the proposed Canada Water Agency as it implements a strengthened Freshwater Action Plan to restore and renew Canada's Great Lakes protection.

We would appreciate the opportunity to meet with you in the not-too-distant future to provide you and your staff with additional background information that might help you in your deliberations. We would also welcome discussing in more detail our concerns about the Ontario open net-pen aquaculture industry and the detrimental impact already caused to Ontario's fresh waters by this industry.

We look forward to a response from your respective Departments and will follow up with your offices regarding our meeting request.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in blue ink that reads "Rupert Kindersley". The signature is written in a cursive style with a horizontal line underneath the name.

Rupert Kindersley
Executive Director

A handwritten signature in black ink that reads "Bruce Barton". The signature is written in a cursive style.

Bruce Barton
Chair of GBA Aquaculture Committee