



May 15, 2017

Dear Mr. Thompson,

The PEI Watershed Alliance is writing this letter regarding the Amended Environmental Impact Statement (EIS) for the Proposed Redevelopment of Snow Island's Atlantic Sea Smolt Ltd's facility in Rollo Bay, PEI.

The Prince Edward Island Watershed Alliance (PEIWA) is a non-profit cooperative association that represents; the 23 community based non-profit watershed management groups on PEI. Our goal is to improve and protect the environmental quality of PEI watersheds, for the benefit of all Island residents. This proposed redevelopment falls within the management area of our member group, Souris and Area Branch of the PEI Wildlife Federation, however, this amendment has implications for all island watershed groups.

Significant changes to the original application are proposed including the building of 2 new large buildings (80,000 sq. ft) and the intent to commercially grow-out genetically modified salmon onsite in Rollo Bay. Our concerns with the amendment fall into two broad categories: environmental concerns with this proposed facility and concerns related to the process of this amended EIS.

Environmental Concerns with the Proposal:

- 1) Atlantic Salmon are endemic to PEI and there are healthy native populations in close proximity to the proposed grow-out facility. Despite safeguards, it is well known that escaped aquaculture fish are common in waterways surrounding aquaculture facilities. The addition of genetically modified non-native salmonids within the local environment will have negative impacts on the endemic populations. Escaped fish will compete with native salmonids for food and habitat resources while those escapees able to reproduce (there is not a 100% sterility rate with triploids) will compromise the native Atlantic Salmon genetic diversity. As the local salmon are believed to be the historical remnants of the original PEI ancestral strain of Atlantic Salmon, the introduction of genetically modified genes into the population is particularly concerning. The original federal risk assessment was based on the commercial grow-out facilities being in Panama where warm water temperatures would limit escapee survival. In this proposal, grow-out is now occurring within the native range of Atlantic Salmon, which has inherently more risks to local bio-diversity and the environment than the original application.
- 2) Large numbers of eggs (13 million eggs) will be produced and will be transported between Rollo Bay and Fortune for fertilization and incubation. This transport of genetically modified eggs on local roads provides opportunity for accidental release of a catastrophic number of fish into local waterways with unpredictable consequences.



- 3) Within this EIS, there is no mention of a contingency plan in the case of escapees or a release of farmed Atlantic Salmon (both conventional and genetically modified). We would like to see a plan outlining how damage to the local environment and local salmonid populations will be minimized and mitigated in the case of any escapee fish. Our suggestion is that AquaBounty should be required to post a bond ensuring they will pay for the costs related to executing the contingency plan. Additionally, we would like to see the local watershed group notified quickly in these escaped fish situations and that these events are recorded in a publically available registry.
- 4) Introduction of disease into the local aquatic environment as aquaculture fish are prone to pathogenic outbreaks. Within this EIS, there is no mention of disease protocols and how water and effluent will be treated to minimize transmission to island wildlife populations. We would like to see additional information on how local native wildlife will be protected from the disease risks posed by this facility,
- 5) Poor water quality is likely to occur downstream due to the release of facility effluent. Water quality testing is only scheduled to occur downstream of the facility once annually, however, we feel this is not adequate given the proposed facility capacity and the effluent screening mechanisms. Water quality testing should be conducted more frequently and the EIS should include a section on how to remediate water quality issues in Rollo Bay Stream.
- 6) In this amendment, the facility will be using a recirculation system which in theory limits the amount of groundwater used however, AquaBounty have obtained a groundwater extraction permit for 6,250 L/min to be used as back-up in the case of equipment malfunction. Our concern is that this water extraction could occur for extended periods of time which would jeopardize the baseflow of Rollo Bay Stream. We are requesting the pumping rates of the facility are recorded and made available to the public.
- 7) We would like to see the results of all government compliance inspections made available to the public including the inspection protocols used. This information along with water usage, disease testing, water quality results, and escapee/release numbers should be online in a public available registry.

Concerns related to the process:

- 1) We were disappointed to hear that the local watershed group, Souris and Area Branch of the PEI Wildlife Federation was left to find out about this amendment through public media channels. We have requested increased communication between local watershed groups and the Department of Communities, Land and Environment on watershed issues through the PEI Watershed Strategy (2015) and the Communications Forum held in Oct 2016. Given the implications that this proposal has on the local environment, the local watershed group should have been specifically notified of the proposal and included in the process at an earlier stage.



- 2) Revising the public meeting format to ensure that the local stakeholders are able to have their questions answered. The format of the public meeting included multiple stations and participants were not adequately able to hear from other attendees and to have their questions answered. We are suggesting the inclusion of an open question period where all attendees can participate at the same time.

We were disappointed by the short time-frame for this public consultation period especially as it coincides with the start of the agriculture and fisheries seasons in rural PEI. We appreciate that the consultation period was extended 10 days based on public pressure, however, we still feel it is too little time given the massive changes proposed in this amendment. In our opinion this application should have been submitted as a new EIS with additional review.

Given our outlined environmental concerns above, we are requesting that this amendment go through additional independent review which would include re-submission to the federal risk assessment process; there is simply too much at stake with regards to our local environment and our native Atlantic Salmon populations to do otherwise.

Sincerely,

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Dale Cameron, Chairperson

cc. Honourable Robert Mitchell, Minister of Communities, Land and Environment.