



Fisheries and Oceans Canada
200 Kent St., Ottawa, ON
K1A 0E6

December 20, 2019

RE: Federal Aquaculture Act Engagement 2019

The Prince Edward Island Watershed Alliance (PEIWA) is the umbrella association that represents the 24 community based non-profit watershed groups on PEI. Our goal is to improve and protect the environmental quality of PEI watersheds, for the benefit of all Island residents. Our member groups are grassroots organizations that work to improve and protect PEI's environment through the engagement of local stakeholders (e.g., landowners, industry, communities) in local solutions to environmental problems. Our groups use watershed management planning to guide their work which involves: identifying issues within watersheds; engaging with communities, stakeholders and experts to determine common vision, goals and solutions; and then working together to implement change.

Watershed groups work in all aspects of watersheds including forests, rivers, and estuaries, and cooperatively with industries including agriculture and aquaculture. With regards to Fisheries and Oceans (DFO) engagement on a proposed Aquaculture Act we make the following suggestions that we feel are necessary to ensure sustained health of local environments and communities.

We have real concern with the consultation processes currently used by DFO on PEI related to stakeholder communication and involvement. In recent years, we have seen aquaculture consultations become increasingly industry focused within minimal input from other stakeholders including our groups. This has led to decisions being made often with minimal community input, inadequate research, and little regard for the local environment. Our feeling is that the current system only considers the industry perspective. This was not the case historically on PEI and we suggest a thorough review of previous processes as these could be re-vamped and implemented in current practices.

At minimum, below is a list of issues that need to be addressed within an Aquaculture Act:

- Wild species are the most important priority. Precedence needs to be given to native species and their habitats.
- Multi-disciplinary stakeholder consultation needs to be included in decision making especially regarding facility placement and leasing agreements.
- Wildlife species including migratory birds to be considered in decisions as aquaculture can have negative impacts on animals, birds and their habitats.
- Community use including recreational users need to be considered and navigable waters need to be maintained.



- Triggers for the Environmental Assessment procedure need to be included when considering new aquaculture facilities and modifications to existing operations.
- Increased transparency mechanisms with regards to licensing of facilities, changes to operations, facility failure, and monitoring of environmental impacts (e.g., registry of water quality information, notification of animal escape etc)
- Negative impacts of aquaculture (e.g., sea pens) need to be considered on a large geographical scale as migratory fish travel large distances in their life history (e.g., PEI origin Atlantic Salmon can have negative interactions with sea-pens in other jurisdictions causing decreased fitness for PEI Atlantic Salmon populations.)
- Additional research around better management practices related to negative impacts of aquaculture on local environments including but not limited to:
 - o Disease/Pest/ transmission between cultured species and wild species (e.g, sea lice, viruses)
 - o Changes in water flow and thermo-regime due to aquaculture (e.g., oyster cages, etc)
 - o Decreased eelgrass populations in vicinity of aquaculture operations
 - o Water quality/ quantity issues and habitat modifications as a result of aquaculture operations (e.g., water withdrawals, effluent, altering streams, etc)
 - o Escaped fish and species and their impact on native fish populations and environments (e.g., Genetically Modified Organisms in local environments, competition factors)
 - o Changes to animal and fish migration routes as a result of aquaculture infrastructure

In summary, we urge that wild species and their habitats are considered top priority within an Aquaculture Act, and we feel that having mandated multidisciplinary committees involved in consultation and decision making is necessary to ensure the health and sustainability of local environments and communities. We look forward to participating in future discussions.

Sincerely,

Mike Durant , Chairperson