



**ONTARIO
RIVERS
ALLIANCE**

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Ed Porter, Manager
Aquaculture Policy and Regulatory Initiatives
Fisheries and Oceans Canada
200 Kent Street, Room 8N187
Ottawa, Ontario K1A 0E6

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Re: Proposed Aquaculture Activities Regulations published in the *Canada Gazette*, Part I, Vol. 148, No. 34 (the Regulations)

Dear Mr. Porter:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-Ottawa Valley, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Friends of Grassy River, Mississippi Riverwatchers, French River Stewardship Council, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems.

ORA is very pleased to offer our comments on the above referenced Regulations, and as prescribed in the *Canada Gazette*.

As ORA mentioned in our 17 March 2014 letter, "*Canada Gazette, Part I Vol. 148, No. 7 — February 15, 2014 Regulations Establishing Conditions for Making Regulations under Subsection 36(5.2) of the Fisheries Act*", the sweeping changes to the Fisheries Act which were introduced in 2012 have weakened one of Canada's most important and effective water and fisheries protection laws.

The proposed Regulations would open the way for aquaculture operations to deposit prescribed drugs, pesticides and other deleterious substances into aquatic ecosystems, when some have had well-documented adverse environmental impacts on ecosystems, and a recent Department of Fisheries and Oceans (DFO) report on the potential effects of anti-sea lice pesticides confirms the importance of a site-specific approach to substance deposit regulations.¹ The problems associated with these operations necessitate consistent and strong national standards and monitoring, to ensure these operations meet the most vigorous environmental protection.

¹ Department of Fisheries and Oceans, "Potential Exposure and Associated Biological Effects from Aquaculture Anti-Sea Lice Pesticides: Canadian Science Advisory Secretariat Science Advisory Report 1013/049" (October 2013) at 9, 11-12, 17, online: http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2013/2013_049-eng.pdf .



ORA urges you to amend the proposed Aquaculture Activities Regulations so as not to allow fish farms to pollute wild fish habitat with impunity. The costs of these proposed regulations must also include the cost to the public and First Nations in the event of loss or impairments to wild fish populations and habitat as a result of the release of prescribed drugs into fish-bearing waters. Removing oversight by DFO and Environment Canada from the release of these prescribed substances into the marine environment increases the risks of harm to wild fish populations, and poses a significant risk to recreational and commercial fisheries valued at close to \$20 billion annually.²

Wild fish are our heritage. They play important economic, cultural, spiritual and recreational roles across the country. From sockeye salmon, a cultural cornerstone of British Columbia, to Atlantic cod, fish are woven into the culture and wellbeing of Canadians coast to coast.

ORA supports careful monitoring and government regulation of possible sources of pollution to help safeguard our waters, our fisheries and our communities. At a minimum, decisions to approve the deposit of drugs, pesticides and waste into aquatic ecosystems should:

- Be made on a case-by-case basis, based on the best available scientific and Indigenous knowledge,
- Take into consideration site-, species- and system-specific factors and the potential cumulative impacts of the deposits along with other activities,
- Require frequent monitoring and regular reconsideration of whether to continue to permit the deposits, and
- Allow for the involvement of First Nations and meaningful public participation.

Blanket-authorization would mean less efficient and effective protection of fish and fish habitat throughout Canada. Effective Regulations would help protect our recreational and commercial fisheries, and ensure the integrity of our waterways.

ORA urges you to provide strong legal protection for our wild fish and fish habitat.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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Cc: Prime Minister Stephen Harper: PM@pm.gc.ca
Gail Shea, Fisheries and Oceans Minister: Gail.Shea@parl.gc.ca
Glenn Thibeault, NDP MP: Glenn.Thibeault@parl.gc.ca

² Fisheries and Oceans Canada, Survey of Recreational Fishing in Canada 2010, s 1.1 at 1, online: http://www.dfompo.gc.ca/stats/rec/can/2010/RECFISH2010_ENG.pdf; Fisheries and Oceans Canada, "National Overview", *Canada's Fisheries Fast Facts 2012*, online: <http://www.dfo-mpo.gc.ca/stats/facts-Info-12-eng.htm>; Fisheries and Oceans Canada, *Survey of Recreational Fishing in Canada 2010*, section 1.2, online: http://www.dfo-mpo.gc.ca/stats/rec/can/2010/RECFISH2010_ENG.pdf.