

**Presentation by Inka Milewski, Science Advisor, Conservation Council of New Brunswick
to the
Senate Standing Committee on Fisheries and Oceans
November 20, 2014, Moncton, New Brunswick**

I would like to thank the Standing Committee for the invitation to speak today. As this venue has no services for projecting slides, I've printed the slides that I'll refer to in my short opening statement.

By way of introduction, I'll just say a few words about the Conservation Council of New Brunswick. Founded in 1969, we are one of the oldest not-for-profit, citizen-based environmental groups in Canada. Since the beginning of aquaculture development in New Brunswick more than three decades ago, the Conservation Council has been pursuing a new framework for sustainable aquaculture, one that respects the limits of nature, does not degrade the ecosystem and is in harmony with other economic, social and cultural activities that use the same natural resource.

Let me say at the outset that we do not support the creation of a new federal aquaculture act. We do not believe it is the solution to the regulatory certainty and investment security that the aquaculture industry seeks. The aquaculture industry often blames, in their words, "a complicated set of regulations that are reactive and inefficient" that have "flatlined" growth in the industry. (Ruth Salmon, Canadian Aquaculture Industry Alliance opening remarks to Senate Committee on June 4, 2013 in Ottawa)

We see no evidence that the aquaculture industry is over-regulated.

The first slide in your handout is a comparison of the Canadian federal Acts regulating aquaculture and other resource sectors such as forestry, mining and livestock operations and Acts regulating the aquaculture industry in Scotland. As you can see, aquaculture regulation is on par with the regulation of livestock operations in Canada as we would expect given that salmon is a food like beef or pork and requires regulations to protect consumer and animal health.

In Scotland, aquaculture is regulated by Scottish and UK legislation as you heard from Willie Cowan, Head of Performance and Aquaculture in Scotland when he testified before this Committee in Ottawa on June 12, 2014. Even though Scotland has an overarching national Aquaculture and Fisheries Act, (much like our Fisheries Act) aquaculture is still governed nationally by 15 Acts and many government departments. They are also governed by European Union legislation as you will see in the next slide in your handout.

Provincially, aquaculture in Canada is governed by far fewer Acts than govern either mining or forestry. Compared to livestock operations, there are three times the number of Acts that govern livestock operations provincially, at least in Ontario, than aquaculture in New Brunswick. As for Scotland, aquaculture is subject to 29 European Union regulations and directives.

Clearly, aquaculture In Canada is not overregulated federally or provincially relative to other resource industries.

Representatives of the aquaculture industry have tried to make the case that aquaculture development in Canada is important not only for creating rural employment but globally in providing protein and feeding a hungry world.

If you turn to the next slide, statistics from the United Nations Food and Agriculture organization show that the majority of global protein comes from vegetables followed by meat. Fish is a very small percentage of the per capita protein consumption and most of the fish is consumed in Europe, North America and Asia. Canadian farmed fish or mussels are not going to feed the hungry in local foodbanks or sub-Saharan Africa.

The next slide shows that fish consumption patterns in Canada are low relative to chicken, pork or beef.

As for creating rural employment, the next slide illustrates that from 2007 to 2012 direct employment in aquaculture dropped 18% while production increased 13.7%. The industry is growing more fish with less people due to technological improvement that reduce the need for labour. No country has done this better than Norway. The following slide shows that it takes about 6000 Norwegians, a little more than the entire Canadian aquaculture workforce, to produce six times the farmed salmon as Canada. These figures were confirmed by Inger Elisabeth Meyer, First Secretary, Royal Norwegian Embassy when she appeared before this Committee on June 5, 2013.

While the aquaculture industry promotes its employment-generating capabilities, in reality like all other businesses, the aquaculture industry is constantly looking for economic efficiencies to improve their profit margin. This can be seen by looking at the value of production and the cost of salary/wages in the industry. Between 2000- and 2012, the total value of aquaculture production in Canada increased 37% while the cost of salary and wages increased only 13%.

I've carefully read the transcripts for all witnesses that have appeared before this committee. As hard as the aquaculture industry is pushing for an Aquaculture Act, not one representative of DFO, even the Minister, have proclaimed their support or even endorsed the creation of a new Act. What the Minister said on February 25, 2014 before this Committee was that her department was "working hard to resolve long-standing regulatory irritants to the industry and the provinces". She did not say that an Aquaculture Act was the solution.

The Minister of Fisheries and Oceans already has access to a wide-range of powerful legislative tools to create efficiency, effectiveness and fairness in regulating the aquaculture industry. One of those regulatory tool is the Oceans Act. In 1997, Canada proclaimed the Oceans Act that authorized the Minister of Fisheries and Oceans to lead and facilitate the development and implementation of plans for the integrated management of all activities affecting estuaries, coastal waters and marine waters.

Integrated coastal planning is outline in DFO's Ocean Strategy Framework document which is much like the Scottish National Planning Framework described by Willie Cowan (Head of Performance and Aquaculture in Scotland) when he testified before this Committee in Ottawa on June 12, 2014). As well, this Committee heard testimony earlier this year from Scottish and Norwegian representatives who said

that coastal zone planning and the engagement of local authorities were key to the development and regulation of aquaculture.

Our recommendation is for the Minister of Fisheries and Oceans to act on the mandate given to her under the Oceans Act and initiate an integrated management or planning process for coastal waters within the five designated large ecosystem management areas that are already defined.

We believe this would give the aquaculture industry what it wants - clarity, certainty and commitment - without creating an entirely new regulatory framework. Similar to planning on land, coastal planning would set out strategic planning goals and objectives which would clarify development priorities. It would define suitable areas for development thereby eliminating uncertainty about site availability and investment. And finally, it would address potential conflicts with other users and other regulatory agencies.