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Regional Assessment of Offshore Wind Development in Nova Scotia
Impact Assessment Agency of Canada
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Halifax, Nova Scotia B3J 3N4

Via email: OffshoreWindNS-EolienneExtracotiereNE@iaac-aeic.gc.ca

December 18, 2024

Dear Regional Assessment Committee Members,

Please accept this submission to the current consultation on the Regional Assessment Committee's (RAC's) Draft Final Report from October 2024. As a representative of Clearwater Seafoods, a responsible operator in several fisheries in Atlantic Canada, I appreciate the opportunity to comment.

Through the purchase of Clearwater Seafoods in January 2021, the Mi'kmaq Coalition made up of seven communities in Atlantic Canada, have a direct stake in the continued sustainability of our oceans as well as access to important fishing areas. The communities, Membertou, Miawpukek, Sipekne'katik, We'koqma'q, Potlotek, Pictou Landing, and Paqtnkek, through FNC Quota Limited Partnership, hold the offshore fishing licences for scallop, lobster, groundfish, clams, and northern shrimp.

Clearwater Seafoods is also a member of the Nova Scotia Fisheries Alliance for Energy Engagement (NSFAEE), an organization representing much of the wild seafood harvesting and processing sectors across Nova Scotia, which has provided collective feedback throughout the RAC's consultation process. We are also a member of the Seafood Processors Association of Nova Scotia and the Atlantic Groundfish Council, organizations that have also contributed directly to the RAC consultation process. The purpose of this submission is to provide specific additional information to that feedback, which we fully endorse.

I will take this opportunity to speak directly on the Potential Development Areas (PDAs), which have the greatest opportunity to negatively impact Clearwater's harvesting operations. Most important of these is Sable Island Bank, where Clearwater harvests a significant ocean quahog resource.

It is an egregious oversight that the report makes no mention in the introduction of Section 6.6.4, starting on page 237 of the fishing operations on Sable Island Bank for offshore clam. It is also omitted in the tables on pages 241 to 245 excepting a short reference to surf clam via the NSFAEE submission.

There is a significant ocean quahog resource of Sable Island Bank, as illustrated by the last scientific survey of the resource, completed in 2003 (see Figure 1).



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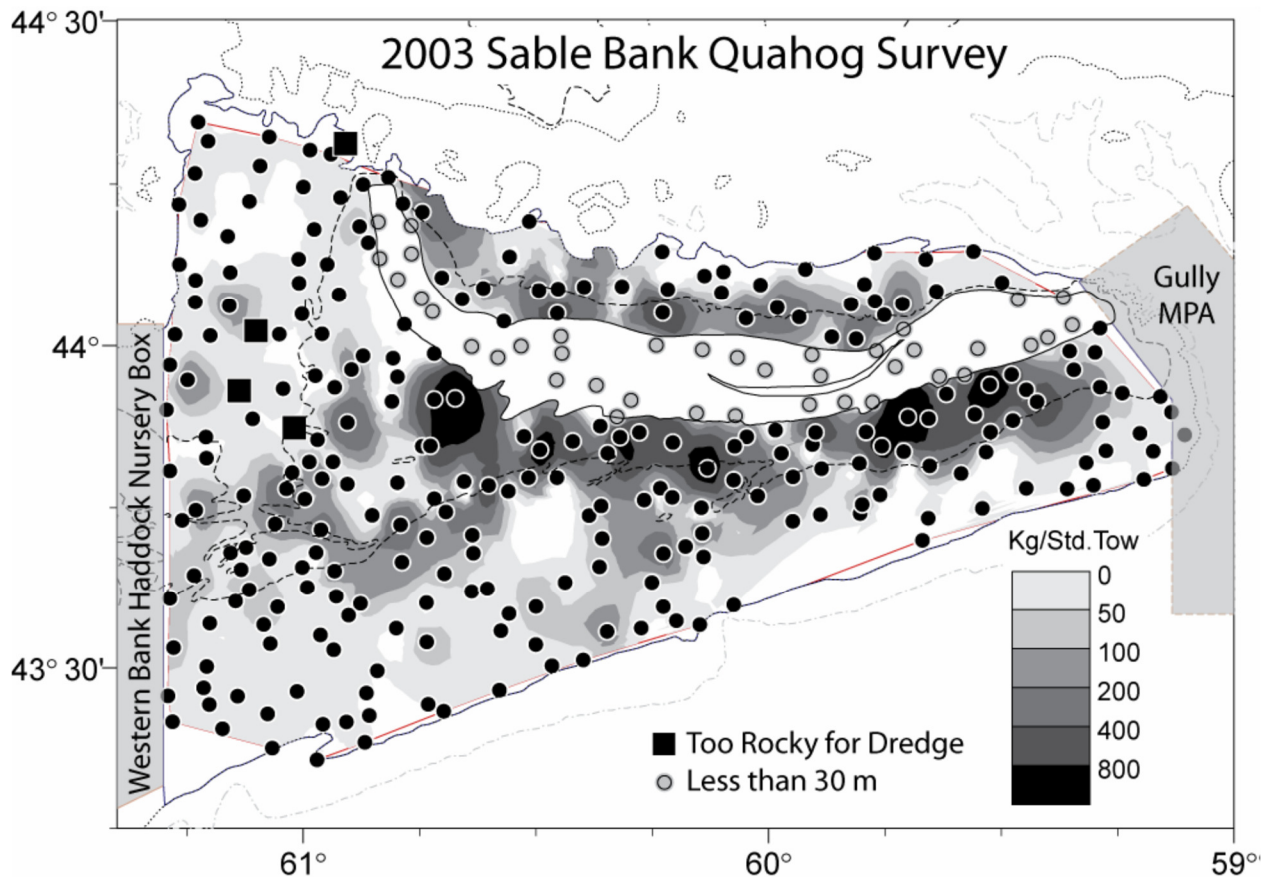


Figure 1. Contour map of the catch per standard (Std.) tow for the 2003 Sable Island Bank ocean quahog survey. Source, Roddick, Kilada & Mombourquette (2007) available at https://www.dfo-mpo.gc.ca/csas-sccs/publications/resdocs-docrech/2007/2007_036-eng.htm

Ocean quahogs are long-lived species, with the oldest aged specimen from the Scotian Shelf reaching 211 years old, while the oldest aged anywhere was 225 years old from the eastern US. While there have not been recent scientific surveys, it is reasonable to assume that the biomass on the bank is similar to that which was identified in the 2003 survey, which is the basis for the current total allowable catch of 11,587 tonnes.

Furthermore, the RAC report does not include fishing data for this area beyond 2021. This data limitation omits the fishing undertaken by Clearwater vessels in more recent years, which has been steadily increasing as we become more familiar with the resource and the successful fishing grounds and build the market for this product.

Exclusion from these areas because of offshore wind development will result in direct and irrecoverable loss of fishing access. Ocean quahogs, like other clams, bury in sandy bottom after maturing out of their larval stage and are then immobile. They do not relocate to other areas and the biomass in that region cannot be made up by harvesting elsewhere.



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We refer the RAC back to the low conflict areas outlined in the initial NSFAEE feedback, which identified Sable Island Bank as an area with significant fishing potential, and therefore likely to be high conflict with offshore wind development.

The RAC must incorporate information regarding the offshore clam biomass for ocean quahog and the offshore clam fishery in its report. Furthermore, I recommend that you revise your PDAs such that Sable Island Bank is no longer a candidate area.

Kind Regards,

<Original signed by>

Catherine Boyd
Director, Sustainability and Public Affairs

cc. Christine Penney, Vice President, Sustainability and Public Affairs, Clearwater Seafoods Limited Partnership.