

HONOURING LIFE IN WOLASTOKUK

The Working Group on Smallmouth Bass Eradication in the Miramichi wants to poison Miramichi Lake to “eradicate smallmouth bass,” but their own scientists doubt the plan will work, and there has never been a rotenone eradication effort on this scale. **DFO** says this project is an **experiment** that represents an opportunity to study the impact of this poison on the ecosystem. **The Wolastoqewi Mothers and Grandmothers want to protect the land and water for the next seven generations.**

The Working Group on Smallmouth Bass Eradication in the Miramichi says...	But....
<p>... they contracted the Canadian Rivers Institute in 2007 to create an expert report on smallmouth bass eradication in Miramichi Lake. Based on that report, they say, they began formulating a plan to use NOXFISH FISH TOXICANT II in Miramichi Lake, its inlet waterways, 17.2km of the Miramichi River and the associated tributaries.</p>	<p>... in e-mail correspondence, Michael van den Heuvel, Director of the Canadian Rivers Institute and co-author of the expert report, stated that it was far too late to follow his expert guidance and that “using rotenone on the lake now is like closing the barn doors after the horses have bolted - the outcome it was designed to prevent has happened.” He referred to the Working Group’s current plan as “very risky” and “a very significantly different proposal than what the science evaluation recommended.”</p>
<p>... physical intervention and humane control methods will not eradicate smallmouth bass, and “all” methods “except the use of rotenone” are “impractical, have a low likelihood of success, or carry risks on their own.”</p>	<p>... humane control methods were effective up until at least 2013, and they were abandoned entirely in 2016. The Working Group’s own experts acknowledge that this plan will not “eradicate” smallmouth bass from the Miramichi watershed – there have been numerous reports of smallmouth bass outside of the poison-zone. DFO contractors who maintain the barrier at the mouth of the lake believe that there are only three adult smallmouth bass females in the lake – meaning population control in the lake remains possible.</p>
<p>... smallmouth bass were illegally introduced into Miramichi Lake around 2008.</p>	<p>... there are anecdotal reports of smallmouth bass in Miramichi Lake as early as the 1980s. It has not been established that smallmouth bass were introduced unnaturally into this watershed. The narrative that an “illegal introduction” of smallmouth bass took place unnaturally and in a certain year was introduced by the Working Group.</p>
<p>... it is dedicated to preserving the ecosystem of the Miramichi River for future generations.</p>	<p>... they want to kill 100,000s of fish, aquatic crustaceans (the food of wading birds), aquatic insects, immature stages of amphibians, and zooplankton (the base of the food chain). Impacts on the ecosystem will be severe. DFO scientists have said: “The NOXFISH FISH TOXICANT II will result in the death of the targeted species, Smallmouth Bass, and all other fish in the defined authorized treatment area(s). The deposit of Noxfish II will modify the food web, the fish ecological structure and the nutrient input in the project area as a result of the anticipated death and subsequent decomposition of fish, insects, and other</p>

	<p>invertebrates.” These impacts do not consider the devastation to other animals who depend on this food web: nesting bald eagles, loons, fish-eating ducks, kingfishers, osprey, herons, sandpipers, otters, and little brown bats, to mention just a few, will lack critical food.</p>
<p>. . . all regulatory steps have been followed and an Environmental Impact Assessment has been completed.</p>	<p>. . . no aquatic impact assessment has been completed, no terms of reference for the provincial EIA have been completed, and under Regulation 2002-13 of the <i>Clean Water Act</i>, Miramichi Lake is classified as “AL” and prohibited activities include: “Direct discharge of a contaminant that is not being released, or any increase in the volume or concentration of a contaminant that is being directly discharged, on the commencement of the Regulation to which this Schedule is attached; creation of a new mixing zone.” This poisoning is prohibited according to New Brunswick’s own laws.</p>
<p>. . . rotenone is safe and “breaks down very rapidly in the environment.”</p>	<p>. . . the European Union has banned rotenone use as a piscicide because of its indiscriminate impact on aquatic life. Moreover, Rotenone represents only 5% of the contents of NOXFISH FISH TOXICANT II. The remaining contents are a variety of chemicals, and research suggests that the other 95% of NOXFISH FISH TOXICANT II takes much longer to disperse. To date, the Working Group has been unwilling to address 95% of the chemicals that comprise NOXFISH FISH TOXICANT II. According to the product label, NOXFISH FISH TOXICANT II is toxic if swallowed, fatal if inhaled, and it is a suspected carcinogen.</p>
<p>. . . “All First Nations in the province have been formally consulted on this project by Fisheries and Oceans Canada (DFO) with participation from the proponent and partners.”</p>	<p>. . . the only Wabanaki community that is mentioned in the Working Group’s own timeline of engagement is Natoaganeg. Mi’kmaq Elders and Grandmothers have not been consulted on this project. FPIC requires that communities be engaged in consultation before a decision-making process is underway; that Indigenous knowledge be given full consideration; that communities will have opportunities to contribute their knowledges to projects that concern them/their land/their rights; that pre-determined outcomes will not be promoted; that project proponents show willingness to change plans; and that Indigenous peoples are not approached with projects that have been finalized. The Maliseet Nation Conservation Council raised serious questions about this project, expected a full community consultation would take place, and were disturbed when identified in media as a partner in this project. The NBAPC have also raised serious concerns about this project, and those concerns have not been addressed.</p>