



We clearly recognize that there are different opinions about the Nordic Aquafarms project in Belfast, which we respect, but we would like to ensure that debate is based on facts.

As we have stated before, some opponents of our project in Belfast have regularly spread misinformation about the project and we think it is important that some of the misinformation is corrected to ensure that residents of Belfast and Northport can make up their mind about the project based on verifiable facts.

Below we comment on some of the statements in letters on March 7th in The Republican Journal.

Misleading by Lawrence Reichard

In her Feb. 27 Republican Journal op-ed, Marianne Naess of Nordic Aquafarms says Nordic Aquafarms has “adopted considerable local input,” but if Nordic truly wanted to adopt local input, it would put its facility where it wouldn't destroy a beautiful forest and a popular hiking trail.

We stand by that statement and have gone to considerable effort to listen to local citizens of Belfast. We have conducted several voluntary information meetings, we have an open-door policy at our downtown office where hundreds of people have stopped by to talk to us, and we have visited many people in Belfast and Northport in their homes at their requests.

In order to preserve the hiking trail, we have also increased the site to enlarge the buffer zones to the trails and neighbors. We have also proposed donating funds to preserve 80 additional acres that will be donated to the city with a deed restriction preserving it for perpetuity. This will ensure that 2.8 miles of trails will be preserved in Belfast. This initiative was based on input from Belfast residents.

Naess misleads when she says Nordic “has made significant investments in tried and proven technologies.” No one, much less Nordic Aquafarms, has completed a land-based project anywhere near this size. Nordic's biggest project to date is less than one-fifth the size of its Belfast project.

This statement is misleading and requires further explanation:

Well proven wastewater treatment technologies will be used in our facility to ensure that the facility removes a higher level of nutrients than any other land-based fish farm today. Nordic

Aquafarms has invested significantly in its treatment technology to minimize the impact of the discharge. This is also why the Atlantic Salmon Federation (ASF), Conservation Law Foundation (CLF) and Gulf of Maine Research Institute (GMRI) support Nordic Aquafarms' project.

The RAS technology that Nordic Aquafarms uses is developed over the last decades and is used for smolt facilities throughout the world where salmon is produced, and a growing number of grow-out facilities also use this technology. Nordic Aquafarms' in-house engineering team is one of the most experienced in the world and has designed RAS facilities for more than 20 years.

Our Norwegian facility is twice the size of our Danish one. The US facility will scale up and further improve our designs. We are simply replicating modules. This is happening all over this industry, as in many other industries. It is called progress.

Naess says we “can be confident that the environment is protected.” Well, we're not. That's why most speakers at meeting after meeting oppose Nordic and that's why 2,460 votes were cast in November for anti-Nordic city council candidates. If Naess is so concerned about the environment, why did she testify Feb. 28 in Augusta against LD 620, a bill to strengthen protection of Maine's marine waters?

Our information meetings have been attended by many opponents. Many people have approached us and said that they don't want to attend the meetings due to this fact. Nevertheless, we have conducted many more meetings to listen to input from opponents of the project.

When it comes to the votes cast in the November election, the number of votes that each of the two single issue write-in candidates received are more accurate representations of the size of the opposition. Having said that, it is important for us to listen to everyone in Belfast.

It is correct that Marianne Naess of Nordic Aquafarms testified against the LD 620, along with the authorities in Maine, Belfast, and other experienced parties. We did not see anyone with a strong scientific or economic standing testify for the bill. We are clearly concerned about the environment and have gone to great lengths to remove nutrients from our discharge. We also support strict regulations of discharge from any facility. LD 620 proposes that any land-based facility can be denied a license or have its license revoked based on the actions of other land-based companies. Every company must adhere to strict regulations, but must be responsible for its own discharge, not what other companies do.

As our MEPDES discharge permit application shows, the values of TSS and ammonia discharged are lower than background levels in the bay. The amount of Phosphorus discharged from our facility (when fully built out) will equal the phosphorus discharge from 10-12 private lawns. According to analysis provided from expert reviews here in Maine, all nutrient levels in the discharge will go to background levels within 30 feet of the point of discharge. As we showed in the information meeting, our nitrogen discharge is less than 1 percent of what goes into the bay, and less than the Bucksport project of a smaller size.

Naess says Belfast “will become the home of one of the most experienced land-based companies in the world.” This means little in a very new industry with very few companies.

As stated before, this is not new technology. The same technology is used in dozens of large smolt facilities internationally; our design team has delivered a number of them to Marine Harvest, Grieg Seafood and other international seafood companies. Farm raised salmon have started and lived the first year of their lives on land for more than 30 years. Land-based facilities differentiate themselves from traditional sea pen aquaculture facilities by letting the fish grow to harvest size on land instead of putting the smolt into pens in the ocean where the discharge is not treated and removed. Significant investments are moving into this industry internationally as we speak as more and more grow-out farms have gone down the learning curve.

Naess repeatedly touts Nordic's informational meetings, but Nordic abandoned an announced Jan. 16 meeting and more than six weeks later no replacement meeting has been announced.

It is true that our tentative meeting on January 16th has been postponed. This was communicated in our January newsletter. The purpose of the meeting was to have a required public informational meeting before submitting our permits to DEP. Since we decided to consolidate our DEP permit applications, this meeting will follow this process. The Public Information Meeting will be held later this month.

Naess attacks Nordic opponents “who have explicitly claimed they would do anything to stop the project.” Nordic has never produced any evidence of this claim. I have followed this issue closely from the start and have never heard such a statement.

Below are a couple of statements supporting this claim:

Project opponent Paul Bernacki said as much recently. The 65-year-old owner of Wayback Farm in Belmont said he has no plans to give up the fight. He said he believes that Nordic Aquafarms will be a “concentrated animal feeding operation,” and that the wastewater that comes from it will end up in “our shallow little bay.”

“This project is an imposition of the kind you read about somewhere else,” he said. “I’m going to devote however much time in the next year necessary to drive these people away. I don’t care. I’m going to go full time.”

Source: New year, new conflicts for Belfast’s proposed land-based salmon farm - BDN • January 4, 2019

Keep it up, Marrienne, we are keeping a file of these ridiculous letters/propaganda rants, that appear to be mostly rewrites of previous work product from your desk and repetition of your statements to reporters, as we slowly but surely defend our home and waters with whatever it takes to make you go away. Wrong planet. Wrong plan. Wrong Bay.

Source: Paul Bernacki, Letter on March 7th to The Republican Journal

Naess says “there is a strong need to supplement the wild catch supply with sustainable farming.” But there is nothing sustainable about a project that, by Nordic's own admission, will spew 7.7 million gallons of effluent and 1,600 pounds of nitrogen into Belfast Bay every day.

See comments above

Naess says “over 90 percent of seafood consumed in the U.S. is imported,” but according to Noah Oppenheim, executive director of the Pacific Coast Federation of Fishermen's Associations, “we (the U.S.) export a majority of the seafood we catch, and much of that is reimported after being processed overseas.”

It is correct that 90% of fresh seafood is imported. Production of fresh seafood in the US will in fact reduce the carbon footprint of fish being airfreighted into the US.

This is also the case for salmon. The only farming left in the US is in Northern Maine. There is no wild Atlantic salmon for sale in the US.

It is correct that some fish caught in the US are sent to Asia for processing and re-imported to the US. This is a practice that is clearly unsustainable and not supported by Nordic Aquafarms.

Naess says Nordic has created eight jobs — but few of those jobs went to Mainers.

Of the eight jobs created in Maine so far, five of the jobs have gone to people born and raised in Maine. The remaining three, have gone to people with expertise that we have not found locally here in Maine.

As the project progresses, there will be more jobs created in Belfast and we anticipate that many of these jobs will go to people from Maine.

Finally, Naess accuses Nordic opponents of “xenophobic undertones in their rhetoric.” We Nordic opponents aren't xenophobic. But we don't like it when outsiders run full-page ads in our local paper saying we're not from here — as Nordic Aquafarms did. Yes, we take offense at that — and rightly so. All we want is to protect our home from a company — any company — that would drain our fresh water, pollute our salt water, and destroy our forest and hiking trail.

Below are some examples of xenophobic rhetoric and actions. There have also been several statements about Nordic Aquafarms being a foreign company and that we have no rights to be in Maine, etc.

You are guests in our country

The publication reported some slight xenophobic comments, with Ethan Hughes of Belfast telling Heim, “You are guests in our country and not the other way around,” later adding a sarcastic “so, welcome.”

Ellie Daniels, another opponent to the site, criticized the use of metric measurements, saying an American permit should include “American measures, so we can understand them more.”

Source: Nordic Aquafarms release discharge estimates for indoor mega salmon farm at heated meeting - By Owen Evans Salmonbusiness.com - 8 October 2018



Nordic's unsubstantiated claims by Paul Bernacki

Marianne keeps repeating her narrative of we (Nordic) are just the poor innocent victims of slander, ignorant and single-minded partisanship and a steady flow of lies and untruths.

Nordic Aquafarms (including myself) would like to keep our dialog based on facts and a meaningful debate, in which we clearly recognize that we disagree on some fundamental issues. We are not particularly interested in portraying ourselves as victims, but having said that, both I and many of my colleagues, have been labelled untruthful, liars, and criminals with lack of credibility.

Nordic's pipe route and property rights to the intertidal zone and the Motion to dismiss our permit application filed by attorney Kim Tucker:

When it comes to right title and interest, the documentation will be provided in our upcoming DEP permit applications. It is true that this is a complicated issue with laws dating back to colonial times, but we have now worked our way through the issues and will present the correct information in our upcoming DEP permit applications.

Keep it up, Marianne, we are keeping a file of these ridiculous letters/propaganda rants, that appear to be mostly rewrites of previous work product from your desk and repetition of your statements to reporters, as we slowly but surely defend our home and waters with whatever it takes to make you go away. Wrong planet. Wrong plan. Wrong Bay.

I do hope we can have a decent debate going forward, and I do hope that you can respect that I defend my company's work without being personally attacked and threatened.

Damage won't disappear with dollars by Eileen Wolper

Limiting regulations to a few minimum requirements supplies false reassurance, reducing corporate accountability for damage. Even if Nordic Aquafarms and Whole Ocean pass muster for a few nutrients (depending on variables that can certainly be manipulated), together they will be polluting our bay and estuary.....With all due respect to our DEP, fines happen after the fact, and that damage is not made to disappear with a few dollars.

We have repeatedly said that we support both strict regulations and monitoring by the authorities to ensure that we comply with these regulations. If Nordic Aquafarms, or another similar company, fail to comply with the allowed discharge values, it is important that the facility adjusts its operation to stay compliant. We don't support a system in which a company can pay a fine and continue to discharge above its approved limits. A company in breach of its permits will also lose its certifications and face serious reputation challenges.

Currents, tides, and the presence of Islesboro between Belfast's bay and the Atlantic cause extended circulation of pollution, not fast dilution as the proponents would have us believe. Even Nordic's models confirm this.

Nordic Aquafarms' model based on analysis conducted by expert scientist based in Maine and verified by an independent environmental consulting firm also located in Maine, dispute that claim.

Council members have actually gone on record (Feb. 19) saying they would oppose someone taking water from our aquifer and trucking it away. Well, picture salmon inside Poland Spring water bottles (heads and guts optional) loaded onto a semi. That is our aquifer being trucked away. With the added bonus of daily effluent discharge poisoning the bay.

We will not extract more water from the aquifer than will be sustainable over time. We have several fresh water sources that will be used. It would not make sense for us to invest several hundreds of millions of dollars if we risked running out of water and consequentluy would have to close down our business.

Legislation to protect our water, bay, and estuary is not bad for business. Rather, it is keeping corporations after our water accountable by keeping shared resources under public control. Such legislation looks at the big picture and ensures Belfast's future prosperity. I support Jan Dodge and other legislators in their efforts to do just that. It's just the right thing to do

There are currently two proposed projects being developed that will discharge into the Penobscot Bay, and thus will be affected by LD 620. When the other RAS company located by Penobscot Bay was granted its discharge permit last fall, we had already started the dialogue with the DEP and informed them about our discharge technology and values for nutrient discharge. Thus, the cumulative effect on the bay of the two facilities, was known to the DEP when the other permit was approved.

The environmental impact of land-based fish farms is rigorously regulated through a series of permits that any land-based aquaculture facility has to obtain from various federal, state and local authorities. We have been in extensive dialog with the authorities such as DEP and we are impressed with the thoroughness of the process and the demands we are facing.

Not listening? By Linda Buckmaster

Marianne Naess doesn't seem to realize that her frequent defensive newspaper columns don't do her company a service. Instead, they just reveal Nordic's insecurity about its project and highlight the effectiveness of the opposition in raising important questions about it.

Our response to claims being made by opponents are not based on Nordic Aquafarms' insecurity about our project, rather a desire to present our views, the facts on which we base our decisions and to correct misunderstandings or misrepresentations. The residents of Belfast and Northport deserve to "see both sides of the story" when making up their minds regarding the project.

I'd like to point out two errors in her latest. Nordic is not in the "final phase" of its permit process as Naess claims. After over a year of working on this project, Nordic has not yet secured even one permit so they are actually still at the beginning. And even that one is stalled because of the submerged lands issue.

Nordic Aquafarms is submitting remaining state and federal permit applications within the next month. We have worked diligently on engineering and design to submit thorough applications to the various federal, state and local agencies. Thus, we are in fact in the final phase of our process to prepare, submit and having processed our permit applications.

Secondly — and even more seriously — Naess says that Maine has strict laws for land-based aquaculture. On the contrary, this industry is so new, there are virtually no regulations for it and Maine communities are unprotected. The Department of Agriculture, Conservation and Forestry, which has only recently been handed this responsibility, needs to develop a full slate of regulations on things such as the potential for diseases getting into our waters; the importation and handling of salmon eggs, smolt, and fry; the conditions under which the fish will be raised; the use of antibiotics and fungicides; and the need for biohazard plans.

Nordic Aquafarms has said that it is regulated by a series of permits submitted to the federal, state and local authorities, in addition to the new regulations for land-based aquaculture that will be in place soon. In fact, Nordic Aquafarms has obtained a temporary land-based permit, that will be revised when the new regulations are finalized shortly.

The editorial published in Bangor Daily News recently explains which permits we have to obtain and the rigorous reviews that we have to go through.

<https://bangordailynews.com/2019/03/07/opinion/editorials/moving-regulatory-goal-posts-is-fishy/>

Naess complains that no one will talk to her company. In fact, the opposition has contributed hundreds of hours of oral testimony and many hundreds of pages of written. Maybe she hasn't been listening?

We have held many voluntary information meetings, have had an open-door policy at our downtown office and we have visited many residents in Belfast and Northport. We have had many good conversations with both supporters and opponents of the project, and we would like to continue with that.

We have also listened to most of the information provided by the opponents - both written and verbal testimonies. That doesn't mean that we or others agree with all the arguments. Having said that, there has been no interest by many of the opponents to either discuss with us, to listen to our arguments or to work on constructive solutions for the community.

Assumptions wrong by *Connie Hatch*

In my opinion, NAF's arrival and continued presence in the Belfast community has been antithetical to respectful, transparent and inclusive negotiations with Belfast citizens. From the beginning, NAF has used both written and spoken language to declare your proposed aquafarm a done deal. I take great issue with your assumption that your project will indeed move forward.

You claim that opponents to your project “...have shown no interest in having dialogue with us.” In hindsight, Ms. Naess, wouldn't it have been in your best interests as well as ours that you have dialogues with the public *before* you approached our City Council behind closed doors and convinced them that your project would bring jobs and tremendous tax revenues to sweeten the deal?

The negotiation between Nordic Aquafarms and the Belfast Water District regarding the purchase-option agreements, was indeed carried out behind closed doors, as any similar agreements with private companies would have been. After that, we went through a due diligence and public process, to review whether the Belfast site would be an appropriate site for our new land-based salmon facility. There has been input from opponents to the project, but we have also received tremendous support by Belfast residents both publicly and directly to Nordic Aquafarms. Belfast City Council has consistently voted 5-0 in favor if the project.

Your assumption that you know what is best for our city, our state and our country in terms of food production is hubris.

We have never claimed that we know what is best for Belfast and its citizens, and we recognize that there are both supporters and opponents of the project. We listen to input from citizens, in fact our purchase of the 80 acres by the upper reservoir to be preserved for perpetuity, was after a well-known project opponent approached us with the suggestion that we contribute to Belfast by helping preserve the land.

Your as yet *unproven* claims that your proposed mega fish factory will be “sustainable” and produce a very low polluting impact on our bay are unfounded.

We have proven this several times in presentations and permit applications. This is also why leading environmental agencies such as Conservation Law Foundation (CLF), Gulf of Maine Research Institute (GRMI) and Atlantic Salmon Federation (ASF) support our application for discharge permits.

The idea that giant corporate, profit-driven companies somehow have the responsibility to “feed the world” is hubris.

I clearly disagree with your perspective that corporate for-profit companies should not be responsible for contributing to a better world. We do, and we will continue to do so in the future.