

From: @eco-nova.com
To: [Environment Assessment Web Account](#)
Subject: Northern Pulp's Replacement Effluent Treatment Facility Project
Date: March 8, 2019 1:22:19 PM
Attachments: [COAC 19 Northern Pulp Effluent .pdf](#)

Clean Ocean Action Committee
P.O. Box 363
Clark's Harbour
Nova Scotia, Canada
BOT 1P0

March 8, 2019

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442 Halifax, NS,
B3J 2P8 Submitted via email: ea@novascotia.ca

RE: Northern Pulp's Replacement Effluent Treatment Facility Project

Good Day Minister Miller,

Please find attached a letter concerning the Clean Ocean Action Committee's comments on Northern Pulp's Replacement Effluent Treatment Facility Project.

Thank You for your consideration.

Regards,
Director
Clean Ocean Action Committee

Clean Ocean Action Committee
P.O. Box 363
Clark's Harbour
Nova Scotia, Canada
B0T 1P0

March 8, 2019

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442 Halifax, NS,
B3J 2P8 Submitted via email: ea@novascotia.ca

RE: Northern Pulp's Replacement Effluent Treatment Facility Project

Good Day Minister Miller,

The Clean Ocean Action Committee (COAC) was formed in 2015, as a consortium of vessel owners, Captains, crew members, fish plant owners, operators and workers whose livelihoods are completely depend on a healthy, sustainable ocean and bountiful fish stocks. We represent over 9,000 individuals totally dependent on the renewable fishery resources on the Scotian Shelf, Georges Bank and the Bay of Fundy. COAC formed to provide fishers and fish processors a unified voice to promote the maximum protection for the renewable ocean resources that have formed the backbone of Nova Scotia's coastal economy for over 300 years.

This letter is to inform your "Environmental Assessment Branch" that we stand in solidarity with the Pictou Landing First Nation and the fishing and tourism industries of the Gulf of St. Lawrence and Northumberland Strait in opposition to the proposed Northern Pulp "Replacement Effluent Treatment Facility Project" and that we call on the Nova Scotia Government to reject this plan outright.

Just as with the oil and gas industry on the Scotian Shelf, Northern Pulp's environmental assessment submission does not prove a lack of significant risk and their report is missing critical data on many essential issues. The report contains insufficient evidence to assess exactly how broad any damage might be and gives no clear indication on what might be done to mitigate this damage should it occur. The company's claim that damage will be "minimal" is not credible and is not supported by the data presented within the report. There is no evidence indicating that the Northumberland Strait or even the Gulf of St. Lawrence can absorb the massive amount of toxic effluent which the Northern Pulp effluent project intends to pump into our fishing and lobster grounds. The Strait and the Gulf of St. Lawrence are already in a state of environmental stress brought on by the accelerating process of climate change. To add the

massive new insult of Northern Pulp effluent to these waters borders on criminality and cannot and should not be permitted. The Nova Scotia Government should be looking for ways to reduce environmental stresses in the Strait not proposing new processes which promote pumping in effluent which will only magnify and exacerbate existing problems.

The fact that Northern Pulp has not, with all the time allotted to them, developed a credible plan to clean up Boat Harbour and deal with their effluent is an insult and a slap in the face to all Nova Scotians. If Northern Pulp continues to refuse to develop and implement a functional and environmentally sustainable effluent treatment plan which does not include pumping toxins into Northumberland Strait we call on the government to stick with its deadline, to implement "The Precautionary Principal" and to close the Boat Harbour plant on the agreed upon date of January 31, 2020.

Most Sincerely,

Clean Ocean Action Committee

From:
To: [Environment Assessment Web Account](#)
Subject: Northern Pulp EA public submission from CPAWS NS
Date: March 9, 2019 11:39:42 PM
Attachments: [Northern Pulp EA CPAWSNS letter March2019 FINAL.pdf](#)

To: Nova Scotia Environment

Please find attached, a written submission from the Nova Scotia Chapter of the Canadian Parks and Wilderness Society, for the project registered by Northern Pulp Nova Scotia Corporation.

Thank you

www.cpaws.org

twitter: @NSwilderness

Canadian Parks and Wilderness Society
Nova Scotia Chapter
P.O. Box 51086 Rockingham Ridge
Halifax, Nova Scotia
B3M 4R8

March 9, 2019

To: Nova Scotia Environment:

The Nova Scotia Chapter of the Canadian Parks and Wilderness Society (CPAWS-NS) has reviewed the Environmental Assessment Registration Document prepared by Dillon Consulting for Northern Pulp Nova Scotia Corporation for the proposed Replacement Effluent Treatment Facility. This proposed undertaking includes a 15.5km long pipeline, which is intended to empty into the marine environment of the Northumberland Strait.

CPAWS-NS is concerned about this proposed undertaking and the impact it could have on the environment and the inshore fishery. We are also concerned about the rushed manner in which this Environmental Assessment Registration Document appears to have been prepared.

As an organization, we had intended on providing a thorough and detailed review of one aspect of the environmental assessment review, dealing solely with “wetlands”. I have a Ph.D. in wetland ecology from the Wetlands Research Centre at the University of Waterloo, and have provided advice to the Nova Scotia government for the development of a provincial wetland policy. Unfortunately, so little information has been provided within the Environmental Assessment Registration Document for the proposed Undertaking dealing with “wetlands” that CPAWS-NS is unable to carry out a proper review. In fact, it is shocking just how little information is provided.

The consultants acknowledge the deficiency in the information provided for the wetland assessment, stating the following:

“It should be noted that fall 2017 to summer 2018 field investigations were undertaken at the replacement ETF footprint area and surrounding area, but as an alternate pipeline route was selected in the fall of 2018 (see Section 5.3) and due to the fall/winter

timing of route selection, only a preliminary reconnaissance visit of the pipeline footprint area was undertaken” (Pg. 223)

That “preliminary reconnaissance” consisted of a single day of fieldwork, undertaken on December 3, 2018. That’s one day of fieldwork, undertaken at a time of year when vegetation surveys could not be completed. This is appalling in its deficiency. I’m actually surprised it was put forward in such a condition.

The Environmental Assessment Registration Document goes on to say that the wetlands were assessed using a “desktop review”.

“Wetlands outside of the replacement ETF footprint area (i.e., along the pipeline footprint area) were assessed primarily via a desktop review with a preliminary field reconnaissance visit.” (Pg. 225)

Sorry, but a “desktop review”, combined with a single day of reconnaissance fieldwork undertaken at a time of year when a proper assessment cannot be completed, is absolutely unacceptable. They state on Pg 224 of the report that part of their desktop review actually involved using Google Streetview.

The consultants state that a “significant portion” of the study area has “not been surveyed in detail for wetlands”:

“The proposed location of the effluent pipeline changed following the completion of the wetlands program for the ETF footprint area during the summer of 2018. As such, a significant portion of the PFA (i.e., the pipeline footprint area) has not been surveyed in detail for wetlands.” (Pg. 231)

That is an absolutely outstanding statement for a Proponent to make in an Environmental Assessment Registration Document, that a significant portion of the wetlands in the study area has not actually been surveyed in detail. Astonishing.

The Proponent goes on to admit that the wetland delineations could not be completed because it was “too late in the growing season to accurately delineate wetland boundaries or accurately identify plants.”

“Full delineations and evaluation of wetland functions for the wetlands adjacent to the pipeline footprint area was not possible since the revised alignment for the pipeline was only defined in the fall of 2018, when wetland delineation/functional evaluation would have been uncertain (i.e., it was too late in the growing season to accurately delineate wetland boundaries or accurately identify plants, especially SAR and SOCC).” (Pg. 232)
(SAR = Species at risk; SOCC = Species of Conservation Concern)

Although the Proponent says it was “not possible” to have completed the wetland assessments, we find that to be rather disingenuous. The Proponent has had a lot of time to prepare for this environmental assessment, yet has made big changes only months prior to submitting the Environmental Assessment Registration Document. Poor planning on their part does not constitute an emergency on anyone else’s part. A more prudent course of action would have been to delay registering the proposed Undertaking until the required wetland

evaluations could have been completed. At present, the Province of Nova Scotia has insufficient information about potential impacts on those wetlands to be able to make an informed decision on this environmental assessment.

The deficiencies in the wetlands review are even more concerning, considering that the proposed undertaking occurs in an area with numerous wetlands. That “desktop review” alone identified 24 wetlands within the study area, including 11 swamps, 4 bogs, 3 fens, 2 marshes, 1 salt marsh, 1 wet meadow, and 2 vernal pools. Detailed on the ground assessments could identify additional wetlands, given the density at which wetlands seem to occur near this proposed pipeline route. In an area of elevated wetland density, you’d think that the Proponent would have been even more careful in ensuring that the required wetland assessments were completed.

Detailed field surveys appear to have only been carried out at 2 of the 24 identified wetlands. The section on wetlands in the Environmental Assessment Registration Document provides a lot of information about wetland type and function, but hardly any of that is site-specific information for wetlands actually occurring within the study site.

I would like to review the detailed field assessments for every one of these wetlands. I’d like to review what species are found there, how the ecosystems change spatially, and what is the nature of the wetland edge condition. I’d like to review how the hydrology may be impacted by this proposed undertaking, and to assess how the fieldwork was set up to ensure objectivity. But, I cannot, because the majority of the wetlands in the study site simply have not been assessed on-the-ground, so that sort of information is unavailable for review.

Despite the lack of evidence presented, and despite only carrying out a single day of fieldwork where no real data was generated, the Proponent reaches a rather firm conclusion that the proposed undertaking will not impact wetlands. The report states the following:

“With the proper implementation of proposed mitigation measures, impacts to wetlands as a result of construction of the project are not anticipated to be significant.” (Pg. 240).

I simply cannot see how anyone could reach such a conclusion about wetlands from the paltry amount of data provided. It is not okay for a Proponent to seek environmental approvals now, without having completed the necessary work, under the promise that it will be done at a later date, after approvals are already received. That’s not how environmental assessments should work.

Using just the limited review of the wetlands portion of the Environmental Assessment Registration Document alone, and disregarding any other potential problems with this project and impacts on the environment, the Province of Nova Scotia cannot, in good conscience, approve this project as currently submitted. Seeing just how deficient the report is for wetlands gives me serious concerns that other sections of the Environmental Assessment Registration Document are similarly deficient.

CPAWS-NS respectfully requests that the Minister of Environment refer this proposed Undertaking to a Full Class 2 Environmental Assessment, so that a proper environmental assessment can be carried out. We also respectfully request that the provincial government

contact the federal government to initiate a Federal Environmental Assessment for this proposed Undertaking.

Thank you for your consideration

Executive Director
Canadian Parks and Wilderness Society – Nova Scotia Chapter

From:
To: [Environment Assessment Web Account](#)
Subject: EAC Submission re. Northern Pulp Nova Scotia Corporation's Replacement Effluent Treatment Facility Project
Date: March 9, 2019 9:35:30 PM
Attachments: [image001.png](#)
[EAC Submission to NS EA for Northern Pulp Pipe Project.docx](#)
Importance: High

Hello. Please find attached our submission re. Northern Pulp Nova Scotia Corporation's Replacement Effluent Treatment Facility Project.

Please confirm receipt.

Thank you

Wilderness Coordinator

2705 Fern Lane, Halifax, NS, B3K 4L3
tel. 902.442.5008,
www.ecologyaction.ca Twitter: @EACwilderness



Ecology Action Centre

March 9, 2019

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442
Halifax, NS, B3J 2P8

Re: Northern Pulp Nova Scotia Corporation's Replacement Effluent Treatment Facility Project

This letter is submitted on behalf of the Ecology Action Centre (EAC), an environmental charity working since 1971 at the local, provincial, national and international level to build a healthier and more sustainable world. Our vision is 'a society in Nova Scotia that respects and protects nature and provides environmentally and economically sustainable solutions for its citizens'. The EAC works to catalyze change through policy advocacy, community development and awareness building. And, when required, we serve as a watchdog for our environment.

In that capacity, we respectfully request that the Minister reject Northern Pulp Nova Scotia Corporation (NPNS)'s proposal as outlined in their registration document under Section 34(1)(f) of the Environment Act "because of the likelihood that it will cause adverse effects or environmental effects that cannot be mitigated". We also cite that there are a number of areas in the registration document where crucial information is lacking or unknown, triggering Section 34(1)(a-c) requiring additional information and focus reports. We also cite Section 2(b)(ii) "the precautionary principle will be used in decision-making so that where there are threats of serious or irreversible damage, the lack of full scientific certainty shall not be used as a reason for postponing measures to prevent environmental degradation."

Despite its impressive volume, NPNS's registration document is very poor and fails to provide necessary information about key elements of their plan, including and importantly - the content of the substances they wish to pump in large volumes into the Northumberland Strait and the potential impacts that it undoubtedly will have on marine life and air quality. The registration document seems designed to obfuscate essential details, downplay them or intentionally omit them altogether. It essentially says there will be no impact of any kind. This is simply not credible. In Table E.1.1-1: Summary of the Significance of Project-Related Residual Environmental Effects Predicted. Every row and column of the table contains 'NS' which represents 'No Significant Residual Environmental Effects Predicted', including water quality, fish and fish habitat, surface and groundwater and the entire 'Accidents, Malfunctions and Unplanned Events' column. It is inconceivable that after NPNS's lengthy history of leaks, ruptures, over-limit emissions and other unplanned events that these predictions could be put forward credibly in a registration document for environmental assessment of this proposed effluent treatment facility.

NPNS has not done its due diligence to fully determine the potential impacts of their proposed project. It is the duty of Nova Scotia Environment to apply a rigorous standard of environmental protection when assessing risk and we do not feel that NPNS has provided sufficient information within their registration document to enable the province to complete the assessment. In light of this, the only acceptable decision is to reject the proponent's proposal for this effluent treatment facility. The potential for damage to our land, water and air from this proposed effluent treatment system is far too great for the province to grant approval.

The EAC's concerns about this proposed effluent treatment facility are numerous. Despite the very limited time available under this 'Class 1 undertaking' environmental assessment process (30 days) to review the proponent's registration document (1,586 pages spread over 17 documents), this letter outlines our primary concerns, which are:

- Use of an insufficient standard for effluent;
- The potential impact on the marine environment from the massive volume of effluent with its undetermined chemical and physical composition;
- Cumulative impacts and the fragility of the ecosystem of the Northumberland Strait;
- The risks associated with the effluent pipe and its pathway;
- Air pollution from burning waste sludge;
- Socio-economic impacts on fisheries and other sectors; and
- Indigenous opposition
- Lack of serious consideration of alternatives

Insufficient Standard for Effluent

NPNS had a responsibility to develop a solution that enables their operations to continue in Nova Scotia while preventing harm to the environment and the wider community. Rather than identifying an innovative solution which does these things, it is clear that NPNS's objective is simply to meet the minimum Pulp and Paper Effluent Regulations (PPER). The federal regulations are very old and are currently undergoing a major overhaul. NPNS will be required to comply with the updated PPER once the new standards are complete and accordingly, it is irresponsible for their effluent goals to just meet the existing standard. And this statement assumes that their effluent would meet the current standard, something that NPNS cannot guarantee since they cannot say what will be in their effluent until the new system is operational.

A key reasoning behind the proposed modifications to current PPER has been the ongoing degradation of fish habitat by most mills, even when in regulatory compliance. The PPER are primarily designed to prevent effluents that cause acute lethality to fish from entering nearby waterways (pg. 357) and do not deal with long-term cumulative effects or ecosystem impacts. Furthermore, according to Caroline Blais, the Director of the Forest Product and *Fisheries Act* Division at Environment and Climate Change Canada (ECCC), 70% of pulp and paper mills abiding by today's PPER have still shown deleterious impact on fish or fish habitat. A 2016 EcoMetrix study also found enlarged gonads and livers in fish tested near the current Boat Harbour effluent treatment facility's outfall location, despite the fact that Northern Pulp has routinely passed the acute lethality testing. Director Blais, [in presentation for the Prince Edward Island Standing Committee on Agriculture and Fisheries](#) in February 2019, described widening the scope of deleterious substances that may call for regulation and "reviewing the regulatory limits for existing and new substances," as central to the government's PPER modification effort. This process will also seek to develop new regulations to treat nutrient inputs, which to date have not been addressed in PPER legislation. NPNS's proposal has not adequately addressed how the company intends to meet new and more stringent effluent regulations that the federal government is working towards.

Simply meeting the PPER is a tremendously low bar to set in environmental protection and is no guarantee that harm to the environment and ecosystem will not occur, only that outdated regulatory maximums of permissible harm might be reached. This is unacceptable, particularly since NPNS cannot even identify what will be in the effluent - a major red flag that this undertaking carries unacceptable levels of risk of impact to the environment and the legitimate interests of other stakeholders. Nova Scotia Environment clearly stated to NPNS that their EA must go beyond the parameters in the Federal PPER. Their proposal as outlined in the

registration document does not do that. Aiming to achieve the lowest possible standard after decades of causing significant environmental damage to the natural world and communities surrounding the mill is simply not enough.

Effluent Content and Potential Impacts on the Marine Environment

The volume and toxicity of the liquid waste produced at the NPNS mill is significant. Boat Harbour provides incontrovertible evidence of the impact of the effluent to the current “receiving waters” - the area is devoid of life. Redirecting the effluent into the Northumberland Strait and the lower Gulf of St. Lawrence will certainly be detrimental to the health and productivity of the new “receiving waters”. But unlike Boat Harbour, where most of the damage to date has been contained (and will cost taxpayers hundreds of millions to clean up), the potential damage to the Northumberland Strait will not be easily contained and will be impossible to clean up.

The Northumberland Strait is a relatively shallow area with slow moving currents far from the open sea. This makes it a very low “flushing” system. It takes approximately a year for the water to fully exchange. Northern Pulp’s own reports say that on top of 60 to 80 million liters of liquid effluent they also anticipate releasing up to four tons of suspended solids in their waste water each day. In addition to that it is important to note that every drain, toilet and sink inside the mill is attached to the effluent disposal system meaning that in addition to human waste every oil or chemical spill inside the plant ends up in their effluent system. Test results in the current receiving waters (Boat Harbour) show the presence of dioxins, furans, chlorinated compounds, halogenated organic compounds and traces of heavy metals. These substances are known to have serious negative impacts to aquatic and other life. In addition to the chemicals and solids produced in the pulping process the new effluent treatment system “will require several chemical inputs, including urea, phosphorus, sodium hydroxide, sulfuric acid and an anti-foam agent to support its process.” (pg. 46). So these too would be sent out into the Northumberland Strait. With so many deleterious inputs it’s no wonder NPNS doesn’t know what will be in their own effluent stream.

Dioxins and Furans

Research from other pulp and paper mills can provide insight on the potential risks to the marine environment associated with some of the products referenced in NPNS’s project proposal. In British Columbia’s Howe Sound, the Port Mellon and Woodfibre bleach kraft pulp mills contaminated the local waters so badly that several fisheries had to be shut down in the 1980s. This was due in large part to the dioxins and furans released as a byproduct of the chlorine bleaching process, the same process used by NPNS. Dioxins and furans are toxic, carcinogenic and bioaccumulative pollutants, posing a significant threat to marine species and human health via ingested seafood or otherwise. These compounds have been linked to cancer and diabetes, among other serious conditions.

In 1992, national Pulp and Paper Effluent Regulations (PPER) were put in place to mitigate harmful impacts to fish habitat, and the marine life at Howe Sound slowly began to recover. But while the dioxin and furan content in the Sound’s commercial fish and crab species have been reduced by 95% or more since that time, in three of eight Dungeness crab samples collected near the Port Mellon mill in 2012, the dioxin and furan content [still exceeded](#) Health Canada’s safe-consumption criteria. Federal advisories to limit crab consumption remain in effect in the area [to this day](#). The same results also held for testing done on Dungeness crab near the Woodfibre mill, despite the fact that Woodfibre was in a relatively good “flushing” position at the mouth of the Squamish River, up until the facility’s closure in 2006.

NPNS’s registration document, in [Section 1-7](#), states that “Dioxins and furans in [Northern Pulp’s] effluent have virtually been eliminated since the conversion to chlorine dioxide bleaching in 1998. NPNS has never exceeded the limits as per the Pulp and Paper Mill Effluent Chlorinated Dioxins and Furans Regulations.” But we know that during NPNS’s [2014 spill](#), on sacred burial grounds at the Pictou First Nation (PFN), proved that

at least five distinct dioxin or furan compounds [were indeed still present in the mill's effluent](#), sixteen years after that conversion to chlorine dioxide bleaching. One of the dioxins was detected more than a kilometre down the beach from the spill site. ECCC regulations stipulate that dioxin and furan content must be non-detectable in pulp mill effluent. In addition, NPNS was found exceeding the daily release allowance for suspended solids by almost double the legal limit. Ultimately, the mill was fined \$225,000 for the incident. Today, NPNS refuses to release the full suite of information on the components of the effluent they would see released into Northumberland Strait under their new proposal, and claims that the risk of contamination to marine habitat is "Not Significant". This is simply not credible.

In an attempt to explain this lack of transparency, the NPNS registration document states, "At this time, effluent chemistry characteristics (including the specific substances present in treated effluent and their anticipated concentrations) will not be known with certainty **until the project is operational**" (pg. 489). An expectation that NS Environment would grant approval to this project without provision of full details of the content of this effluent to be discharged into the Northumberland Strait should be extremely suspect, particularly given the company's track record of non-compliance. This includes not only the regulatory disregard displayed during the 2014 PFN spill, but also [another spill by the Mackenzie Pulp Mill Corporation](#), owned by Paper Excellence (NPNS's parent company). In this case, Mackenzie Pulp was fined \$900,000 and added to the Canadian Environmental Offenders Registry for violating the *Fisheries Act* by neglecting to properly treat the effluent spilled into British Columbia's Williston Lake on two occasions in 2014 and 2016. Paper Excellence has proven in spill scenarios in both Nova Scotia and British Columbia that their standard of care is simply not high enough for Maritime citizens to entrust this company to operate within the bounds of legality, let alone safety, in the Northumberland Strait.

Additionally, it is important to consider the cumulative effects of adding the toxins from NPNS's effluent into the proposed discharge area. In 2002, [a study](#) conducted on Nova Scotia's North Shore tested mussels for leukemia. At a site just 500 metres from the current Boat Harbour Treatment Facility outfall location, 30% of the tested mussels were infected. At a distance of one kilometre, 23% of the tested mussels showed signs of leukemia. In contrast, 56% of tested mussels in Pictou Harbour showed leukemia - a higher rate because of the dumping of untreated sewage at the time. Conversely, mussels tested in Merigomish Harbour did not show any effects of leukemia. In the end, the scientific team pinned the [results](#) on both municipal and industrial waste products. With the proposed level of effluent expected to be released into the Strait under NPNS's new plan, we may risk a future in which continued inputs render the local area entirely unusable for shellfish aquaculture or shellfish harvest altogether.

Total Suspended Solids (TSS) and Cellulose Fibers

NPNS public relations messaging from NPNS says that the new effluent treatment facility will be better than the existing one at Boat Harbour. However, this is not credible because Boat Harbour currently allows all the solids and the worst toxic elements to settle out and for the fluid to cool, often called "polishing off", as it is held for approximately a month before its release into the Northumberland Strait. The new effluent system will attempt to "treat" and cool the effluent in a matter of hours before it is released directly into the marine environment. In private documents and in recent media interviews, NPNS executives have admitted that the effluent is likely to be no better - and could potentially be worse - than what now flows into the Boat Harbour basin (Point C).

Total Suspended Solids (TSS) largely consists of cellulose fibers. Although the document states that 85 to 95% of the lignin, cellulose, sodium sulphide and sodium hydroxide will be removed from the sludge via biological activity in treatment, there is no information provided about the 5-15% which survives treatment - the cellulose. Cellulose fibers are refractory, meaning that they don't degrade quickly or decompose well in water, especially seawater. The registration document provides, in section 5.2.2.9 on Effluent Quality, that the effluent annual average flow will have an anticipated TSS concentration of 48 mg/l of effluent which equates to

a total 3053 kg of TSS per day, i.e., a full dump truck load each day in equivalent tonnage. These fibers have the potential to settle into a deep hole or depression, smothering the bottom and causing anoxia in the underlying sediment. The document hints at this on page 347: “The discharge of effluent containing elevated levels of TSS could also cause a change in sediment quality near the diffuser due to the settlement of suspended sediment, which could cause a change in sediment characteristics such as sand and silt size fractions and/or a change in chemical composition of sediments”. The TSS could very likely spread beyond the area near the diffuser due to the buoyant nature of effluent and the likelihood that the effluent plume will reach the surface of the marine water column. This is the very same TSS, known to be harmful to marine life, that NPNS was found to be pumping at a rate of double the daily legal limit into Boat Harbour during the company’s 2014 spill on First Nations land.

The insoluble nature of these fibers, the proposed volume of TSS discharge, the potentially wide area of impact and the inability to observe and monitor the effluent stream make this incredibly risky and appear to guarantee a significant impact on the marine environment.

Cumulative Effects: Long Term risk in a Fragile Ecosystem

The Gulf of St. Lawrence is already one of the most highly-stressed marine ecosystems on earth. In a [recent study](#) published in the journal Nature Climate Change indicates that the Gulf of St. Lawrence is showing a dramatic decline in oxygen.

A [separate study](#) done by DFO and University du Quebec entitled “Man-Made Environmental Changes in the Southern Gulf of St. Lawrence, and their Possible Impact on Inshore Fisheries” states: “Major sources of stress on the Gulf of St. Lawrence ecosystem include climatic changes on one hand and human-induced interferences such as physical modification, pollution and harvesting on the other hand. There are indications that these changes have significant impact on the oceanography, ecology and fisheries of the Gulf. The potential danger to the fishery includes physical, biological and chemical contamination.”

This is research that should be covered in effective cumulative effects assessment processes examining marine environments. Northern Pulp’s Cumulative Effects research presents a marine “Regional Assessment Area” between Pictou Harbour and Charlottetown to the north, spanning approximately 60 kilometres in an east-west direction. The proponents claim that the majority of the disruption to ocean habitat is likely to take place during the project’s construction phase, when the seafloor is to be dredged and laid with a rocky substrate to lay the pipeline and keep it place over the long-term. As for the operations phase, during which the pipe will dump its tens of million litres of treated effluent into the Strait, the report suggest that all concerns related to the quality of the water will dissipate within five metres of the discharge location.

The report claims that “given the likely lack of spatial overlap at this location, significant cumulative residual environmental effects to water quality or sediment quality as a result of treated effluent discharge are not likely.” But several studies, as well as ECCC expert testimony before the Prince Edward Island Standing Committee on Agriculture and Fisheries referenced above, tell us that pulp and paper effluent *is* known to be harmful to fish and fish habitat in the majority of tested circumstances. In essence, the substance that Northern Pulp would inject into the Northumberland Strait *would*, undoubtedly, pose a threat to aquatic life - and the assessment document says as much - *but suggests that*, because of dilutive power of the ocean, no great harm should occur in this instance. This simply is not true and this type of outdated Industrial Age thinking, suggesting that, because the ocean is big, it should be able to absorb our waste forever, is the same thinking that now sees the [entire planet awash with plastic waste](#).

In a Northumberland Strait context, the cumulative impacts of over 25 billion liters of toxic effluent flowing into the water every year in perpetuity are potentially catastrophic. The NPNS registration document clearly shows that there will be very little, if any, positive change in wastewater quality with the proposed effluent treatment system and information revealed through the FOIPOP requested showed NPNS suggesting that the effluent could in fact be worse. [With a myriad of chemical and nutrient inputs](#) from municipal wastewater systems, industrial operations and agricultural runoff, among others, this is no time to augment present threats to marine life by adding a continuous, high volume stream of toxic pollution into a shallow, low flowing section of the ecosystem. We need our governments and our commercial industries to work together to reduce the inputs already entering into the Strait, and we need to put plans in place to start restoring this natural Maritime treasure, [as has been called for](#) by federal studies. If we don't, we are at significant risk of creating contaminated marine habitats and unfishable dead zones in the future.

Pipeline Pathway

The effluent pipeline will go over Pictou Harbour, attached to the causeway across Highway 106 and then in a trench through the Town of Pictou's water supply area, putting both at risk in the event of a pipeline breach or spill. Similarly, the potential for pipeline failure at Caribou Harbour is considerable. These are unacceptable risks.

Air Pollution

In the plan outlined in NPNS's registration document, toxic sludge will be collected early in the effluent treatment process and will then be burned in the NPNS power boiler. Chemicals from this process, including Polycyclic Aromatic Hydrocarbons, Volatile Organic Compounds, sulphur and chlorinated compounds, benzene, cadmium, as well as fine particulate matter will be released. The NPNS registration document speaks virtuously about displacing unspecified amounts of fossil fuels by collecting and burning chemically-laden sludge from the pulping process. It states the sludge will have a 40% moisture content. This will provide no fuel (heat) value and will likely require as much or more fossil fuel to burn. Much worse is the fact that it will actually make the mill's already terrible air emissions problems even worse by burning this toxic sludge in the mill's power boiler which has no precipitator and reportedly malfunctioning/non-functioning scrubbers to "clean" the Sulphur, VOCs and other chemical compounds, and carcinogenic fine particulate matter (PM10 and PM 2.5). The NPNS registration document indicates incineration of up to 20 tonnes of chemically laden sludge per day in the power boiler. The power boiler is very old and has [repeatedly failed](#) stack emissions tests. This is a significant public health risk and yet another compelling reason to reject this proposal. Although the provincial Class 1 Environmental Assessment does not specifically require the proponent to conduct a human health risk assessment (HHRA) study, such a study should be ordered by the minister under Environment Act Section 34(1)c or b.

The NPNS registration document acknowledges that there will be additional pollutants released by burning the sludge in the power boiler and that these airborne pollutants will land on nearby "receptors" (e.g. people, animals, land, water, etc.):

"Emissions of combustion gases, particulate matter, and possibly odour from the replacement ETF during operation and maintenance could result in air contaminants that could disperse in the atmosphere to off-site receptors. Additionally, since the project will include the combustion of sludge generated in the replacement ETF for energy recovery and odour control, emissions from the combustion of such sludge in the power boiler during operation and maintenance could disperse from mill stacks to off-site receptors." (Pg. 142)

Air quality testing has been incredibly lax in and around the NPNS mill. A new, robust independent air quality monitoring program should be required of NPNS by the Minister. This should include continuous stack emissions monitoring and multiple remote sensors. This data should be made available to the public in a continuous, real-time feed over the internet.

A sample of some of NPNS's recent air pollution violations:

- In 2014 the mill reported the release of 1,290 tonnes of fine particulate matter — the equivalent of 13 Irving St. John pulp mills in one location.
- Air emissions exceeded limits 4 times in a two year span - March and September 2015, June and December 2016.
- NSE investigation in 2017 as mill exceeded air contaminant emissions limits by nearly 50 per cent in June.
- The mill exceeded emissions 3 years in a row (2015, 2016 and 2017) despite the purchase and instillation of a new electrostatic precipitator on the recovery boiler stack.

Socio-Economic Impacts

Risk to Fisheries and Aquaculture

Despite NPNS's claim that the project proposal's impact on marine life will not be significant, the company's Receiving Waters Study, prepared by Stantec in August of 2017, states, "Among the four potential outfall locations ... the [chosen] outfall location provides the *smallest potential long-term cumulative effects* on the fishery and socio-economic environments, and therefore is considered the better outfall location for the discharge of the treated wastewater from the mill." (Conclusion 2.4) Here we see suggestion that NPNS is [well aware](#) that the fishery will be adversely impacted in the long term, despite public claims to the contrary. The potential impacts to fish, bivalves, crustaceans, fish habitat and critical spawning areas are outlined above. While the deleterious short term impacts of NPNS's proposed effluent treatment facility on fisheries may be limited to a relatively small area, the long-term effects could still be significant. The Lobster Fishing Area 26A, stretching east-west from Pugwash to Port Hastings and north of Souris, PEI, supports more than [700 licenses at 300 traps per license](#). This is a marine area worth upwards of \$40 million on fisheries alone. The Northumberland Fishermen's Association notes in a [position letter](#) that the Strait is one of the "most lucrative habitat and spawning grounds for lobster, crab, scallop, herring, mackerel and groundfish" in the Gulf. Each haul is significant to the fishermen that live and work there and, as such, the long term effects on the larger fishery should be more carefully considered.

Northern Pulp has demonstrated a clear unwillingness to do the work necessary to address these concerns in their environmental assessment registration document; particularly those concerns of the lobster fishermen in the region. NPNS's consultants at Dillon Consulting even went so far as to prompt Northern Pulp via letter in February of 2018, noting the importance of further research on lobster at all of the animal's life developmental stages: "... Conducting research on lobster larvae, and potential alternative to pipe discharge into the Strait needs to be completed to demonstrate to regulators that these were properly considered and stakeholder concerns are being addressed as much as reasonably possible."

In spite of this recommendation, NPNS did not conduct any studies or provide any information on potential impacts over the various life stages of the most important commercial marine species in the Canadian Atlantic, simply dismissing the issue by saying, "It was the conclusion that it is highly unlikely that there will be serious

impact on lobster or lobster larvae given the limited area of potential impact.” The assessment goes on to admit that marine studies “have been hampered by both seasonal constraints and by physical opposition and obstruction... The existing environmental conditions and associated potential environmental effects of the project therefore have been defined based on existing available information.” Again, we see a standard of care set far too low, in the face of significant risks and potential consequences.

Maritimers and Maritime fishermen have told NS Environment and NPNS loud and clear that this is a risk they are not willing to have foisted upon them; that the social and economic value of the region’s fisheries are simply too great. Fishing unions and associations alike [have since called](#), for a federal environmental assessment. At a broader scale, the economic value of Atlantic Canadian seafood production is immense. Fisheries and aquaculture products account for [upwards of \\$3 billion](#) to the Atlantic economy, with more than 15,000 licensed fishing boats and more than 500 aquaculture outfits. The Northumberland Strait is major component of that system, and the Southern Gulf of St. Lawrence has been one of the [most productive lobster regions](#) in the country. Today, there are some 700 fishing licenses. The legitimate concerns of the Northumberland Strait fishermen, and Canadian fishermen more broadly, need to be accepted and respected.

Reputational Risk to Nova Scotia Seafood Brand

Nova Scotia has an international reputation for producing high-quality seafood from “cold, clean and pristine northern waters”. This is particularly true for our shellfish - lobster, scallops and oysters. The reputational risk to the industry if any harvested species becomes contaminated with pollutants is significant - particularly in emerging markets in China and southeast Asia where demand from an expanding middle class is dependent on the “clean and pristine” brand. In this regard it is instructive to recall that the discovery of a single reported case of BSE or mad cow disease in 2003 led to an immediate worldwide ban on all Canadian beef imports which lasted for years and cost the industry billions of dollars in lost sales. Imagine what one contaminated lobster could do to the Canadian lobster industry’s access to foreign markets. Even the idea of seafood produced in polluted waters could be enough to shut down or seriously curtail demand in sensitive markets like China. This is a serious financial risk that Nova Scotia cannot afford to take.

EAC supports the fishermen.

Tourism Industry

The tourism industry in Nova Scotia is worth \$2.7 Billion and growing, creating 40,000 jobs and producing \$300 million in taxes. At a regional level, tourism revenue in the Northumberland Shore Region of Nova Scotia is 7.8% of the total tourism revenues translating to \$210.6 Million and over 3,200 jobs, generating about \$24M in tax revenues. This sector of the economy could be much greater but is hampered by the presence of the NPNS mill.

Tourism operators have reported the length of stay in the Town of Pictou has declined from 2010, an average of 3.3 days to 2017 at 2.5 days. Tourism Operators explain the decline in visitor stays is a direct result of the air and water pollution emanating from the NPNS mill. Allowing the mill to release its effluent into the Northumberland Strait and to increase its harmful air emissions by burning large quantities of toxic sludge will only make things worse for this industry. Tourism operators in western Cape Breton (Inverness County), along the south coast of PEI and the New Brunswick coastline of the Northumberland Strait are all at risk of impacts from the proposed discharge of large volumes of effluent into the marine environment.

EAC supports the tourism operators.

Indigenous opposition

It is important to note that all of the Mi'kmaq Chiefs in the three Maritime Provinces are opposed to piping the NPNS mill's effluent into the Northumberland Strait. Chief Terry Paul identified the mill's proposal for a new effluent treatment plant as the top issue raised by Mi'kmaq leaders in their annual meeting with Provincial Cabinet in December 2017. "The first consideration is the environment" he said. "We want to ensure that whatever is done to mitigate the effluent there isn't detrimental to the fishery". He stated clearly that the chiefs cannot support the NPNS effluent pipe plan. Chief Andrea Paul of Pictou Landing First Nation has been unequivocal in stating her communities firm opposition to the proposed new effluent treatment system. "The effluent discharge is in the Northumberland Strait and for that we are opposing it" she said in July 2018. "We do not want this pipe in our waters. We need to protect our resources. All of us have an inherent duty to do that".

EAC supports the Mi'kmaq.

Unwillingness to Explore Alternatives

The pulp mill in Pictou County has a long history of putting Nova Scotia's environment and citizens at risk. Despite five years to find a suitable alternative to the Boat Harbour treatment facility and taking the opportunity to improve their environmental performance, NPNS simply offers one single option: to pollute a different area, this time spreading the potential impact much further. The registration document has been carefully tailored to reach the NPNS's preferred outcome of pumping the effluent into the sea. In preparing the document the consultants, appear to have relied almost exclusively on information provided by NPNS. There is no evidence of serious independent analysis of the options, assumptions or conclusions in the report. The Ecology Action Centre strongly disagrees and believes that NPNS could do much to 1) reduce the toxicity of their effluent by improving internal process inside the mill and 2) negate the need to dispose of their effluent into the environment at all by modifying their production process (i.e. eliminate chemical bleaching) and installing a closed-loop system.

It is clear from NPNS's registration document that the scope of exploration of alternative options was deliberately narrow and entirely restricted to finding an alternative dumping site for the effluent. All other options to reduce or eliminate the mills liquid pollution output are summarily dismissed early in the registration document, abandoning any further consideration or research for better options. On its project website, NPNS confirms this: "At the onset of the design phase a closed loop (zero effluent) treatment alternative was immediately ruled out as it is not an option for Northern Pulp. A closed loop system does not exist anywhere in the world for an elemental chlorine free (ECF) bleached kraft pulp mill. The concept is not technically or economically achievable." This is consistent with NPNS's long-held public position that only a pipeline into the Northumberland Strait will work. NPNS says the technology does not exist to close their loop. They are lying by omission.

NPNS could install and run a closed-loop system if it simply changed its production process and stopped bleaching their semi-finished kraft pulp product prior to shipping it to their Asian parent company. The result would be a light brown fiber product rather than a bright-white one. If the parent company wished to bleach some or all of the kraft pulp during its subsequent product production processes (making tissue, napkins, diapers, etc.) they could easily do so at their end. Another workable alternative would be to retool the NPNS mill to use peroxide and ozone instead of chlorine dioxide to whiten their kraft pulp and thus become a Totally Chlorine Free (TCF) mill.

The truth is NPNS could change its process and install a closed loop system but they have chosen not to. They admit as much in their registration document (Project Alternative 3: Change the NPNS Mill Type and Make a

Closed Loop System, Pgs. 25-26), stating the reason for not doing so is that it is “market prohibitive”, not that it is technically impossible. Their justification for not doing so is cost: “NPNS would not remain competitive due to high wood and electricity costs” and that “NPNS must continue to operate by producing NBSK to be economically viable”. They admitted that “Production of a different type of pulp can allow operation using closed loop systems.” But that “NPNS would not be economically viable with a different product”. Although NPNS says changing their product process is “not economically viable”, they provide no proof for these claim.

Notwithstanding their refusal to seriously consider altering their process and implementing a closed loop system, before the NPNS mill starts pumping their effluent anywhere they should first be required to improve the inside performance of their very old mill in order to significantly improve the quality of the effluent before it is sent for secondary treatment. In industry parlance this is called “tightening up the loops” inside the mill prior to the effluent treatment process. The mill employs very old (1960s era) technology. There are three specific areas that need to be modernized before sending effluent into a secondary treatment system, regardless of where the effluent is subsequently dumped. They are: #1 Optimize brown stock washing, #2 Install an oxygen delignification system in the bleaching plant and #3 Implement fail-safe systems to ensure against process upsets into the effluent treatment system. Process upsets can come from overflows of brown stock, bleach and/or black liquor.

It’s important to point out that with regard to #2, NPNS has previously said they would be installing an oxygen delignification system which would result in a 30 to 40% reduction in chlorine dioxide bleaching chemicals and thus much “cleaner” effluent. That oxygen delignification system is now missing from NPNS’s registration document.

It’s also important to highlight why NPNS should be required to build in effective fail-safe systems to minimize and contain process upsets whereby the system becomes overloaded with pulping chemicals and shuts down the biological activated sludge (BAS) treatment process. In brief: NPNS has a history of frequent process upsets with its current effluent treatment system in Boat Harbour. When this happens the biological agents (bacteria, fungi and protozoa) that are used to consume organic pollution from the effluent prior to release are killed and the process stops working. In the Boat Harbour lagoon, the untreated effluent can be contained at an early stage while the system is re-inoculated with replacement biological agents so treatment can be resumed. This can take several days. In the event of black liquor or other chemical spills into the proposed new effluent treatment system, the biological agents will be killed and the system will stop functioning as it’s supposed to. In the registration document, NPNS says it plans to build a 35 million liter raw effluent spill basin that, assuming optimum conditions, will be sufficient to contain 10 to 13 hours of effluent diversion in the event of process upsets (pg. 42). That means only half a day’s worth of effluent can be contained while they try to fix the problem. But process upsets often take much longer to fix than half a day. Therefore the risk of potentially large volumes of untreated effluent by-passing the new effluent treatment system and flowing directly out into the marine environment is very high as their proposed spill basin will be too small to contain effluent volumes greater than half a day’s output while NPNS works to restore the biological agents to sufficient levels to function again.

NPNS has repeatedly minimized serious concerns about their effluent treatment plan. Vague assurances through the registration document with phrases such as ‘no significant residual environmental effect predicted’ are simply not credible, particularly in light of the vast evidence of ecosystem destruction committed at Boat Harbour. With an effluent leak only months ago in October 2018, which was discovered by a citizen walking in the vicinity of the mill, and another in June 2014 that released 47 million litres before detection, public trust is at an all-time low. Attribution of pollution in the Northumberland Strait will be challenging, ensuring that the province of Nova Scotia will have a very difficult time seeking remediation for damages. Fastidious monitoring will be required to intervene as quickly as possible and ideally this monitoring would be administered by an independent body to ensure compliance.

Conclusion

The Ecology Action Centre strongly recommends that the Minister of Environment reject NPNS's effluent treatment facility proposal as outlined in their registration document. The document fails to provide the Province with the required information to assure itself and all Nova Scotians that their proposed effluent treatment facility would be safe for the community or the environment. All evidence points to the fact that this effluent treatment facility will cause at least as much pollution as the levels at Boat Harbour, if not more, and this time the pollution will be spread over a far greater area with even less ability to contain and repair that damage in the future. It is also clear that the burning of large amounts of toxic sludge in the power boiler will make the mill's already terrible air emissions even worse. The claims by NPNS that there will be no impact of any kind is not credible and they have failed to provide evidence that this even possible. It is unconscionable of NPNS to ask, nay, demand that Nova Scotian's accept all the risks and harms so an ancient, highly-polluting pulp mill can continue operating for a few more years.

NPNS has shown a consistent sense of entitlement, often operating outside of the rules and boundaries which exist to protect our environment. NPNS even made a request to begin building elements of its proposed new effluent treatment system in mid-2018, well before submitting its proposal for environmental assessment. The sheer audacity of this request demonstrates a corporation that fully expects Nova Scotia to continue to bend to their wishes, regardless of the impacts. Now that we are within a year of the January 31, 2020 shut down date for the Boat Harbour effluent treatment system, the corporation has requested an extension to continue polluting Boat Harbour, citing a lack of time to get an alternative in place. Complying with this request would require repealing that legislation and would be an unforgivable violation of the faith of the Pictou Landing First Nations community and to every other Nova Scotian who is counting down the days until January 31, 2020.

It is time for this province to stop operating with a methodology of privatizing our shared natural resources for private profit while socializing the enormous risks and costs. Nova Scotian taxpayers will long be paying for the damage that has already been done by the pulp mill at Abercrombie Point in Pictou County. The investment to create the new pipe, a piece of infrastructure which will cost an enormous amount and likely to be charged again to the taxpayer, is making a commitment to allow this mill to continue discharging toxic effluent into our environment for many years to come. That is unacceptable. The Minister should reject this project outright. Failing that the Minister must, at the very least, order focus reports in a number of areas where information is lacking, including the composition of the effluent, baseline studies on lobsters and other marine species, baseline benthic surveys of the bottom of Caribou Bay, plans for air pollution controls and monitoring, etc. The minister should also order the mill to upgrade its internal processes and equipment to reduce its already substantial air and water pollution levels regardless of if or where they might send their effluent. But at the end of the day the Minister must not make a bad situation worse by allowing another place to be fouled and one that can never be cleaned up.

In closing we cite Premier Stephen McNeil's wise words at the annual meeting of Nova Scotia Cabinet and Mi'kmaq Chiefs on December 14th, 2017 in Millbrook: *"It has never been our government's intention and never will be our government's intention to clean up one environmental problem and move it somewhere else."*

And that is the right answer. No pipe.

Respectfully submitted,

Wilderness Coordinator
Coastal Coordinator
Marine Conservation Officer

From: @forestns.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: March 4, 2019 12:49:27 PM

Project: replacement_effluent_treatment_facility_project Comments: I write today on behalf of ForestNS in support of the Northern Pulp ETF replacement project. This project is vital to the continued operations of Northern Pulp and therefore the future of a tightly integrated forest industry here in Nova Scotia. From landowners to harvesting and trucking contractors, sawmillers to the thousands of Nova Scotians that work in and with our sector every day - this project is very important. Having reviewed the EA submission within my laymans capabilities on such an in-depth submission, I have every confidence in the expertise at Northern Pulp and the engineers, consultants and experts they have worked with to develop this project, along with the regulatory and oversight expertise of ENS to ensure the operation and compliance of a new ETF. It is my belief that this project should proceed as early as possible to ensure Northern Pulp's future in a strong forest sector in our province. Name: Email: @forestns.ca Address:

: Privacy-Statement: agree x: 77 y: 18

From:
To: ec.ministre-minister.ec@canada.ca; jonathon.wilkinson@parl.gc.ca; [Minister, Env](#); ceaa.northernpulp.acee@ceaa-acee.gc.ca; [Environment Assessment Web Account](#)
Cc: thehacaribou@gmail.com
Subject: re: Caribou Harbour Authority - Request for Federal Environmental Assessment and Comments respecting Provincial Assessment
Date: February 21, 2019 3:49:59 PM
Attachments: [Catherine McKenna et al Northern Pulp Caribou Harbour Authority Feb 21 19.pdf](#)

Dear Sir or Madam and Ministers:

Please be advised I represent the Harbour Authority of Caribou, Pictou County, Nova Scotia. Please find attached correspondence for submitted for consideration on behalf of the my client.

Yours truly,



195 North Foord Street
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Honourable Catherine McKenna
Minister of Environment and Climate Change
House of Commons
Ottawa, Ontario
K1A 0A6

ec.ministre-minister.ec@canada.ca

Honourable Jonathan Wilkinson
Minister of Fisheries
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Honourable Margaret Miller
Department of Environment
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Environmental Assessment Branch
Nova Scotia Environment
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Fax: (902) 424-6925
EA@novascotia.ca

Dear Sir or Madam and Ministers:

Please be advised we represent the Harbour Authority of Caribou (hereafter the "Authority"), Pictou County, Nova Scotia. Located at the mouth of Caribou Harbour the Authority operates the busiest fishing port in Northern Nova Scotia. It is the hub of fishing activity from April to early December each fishing season. It is accessed via the 106 branch of the Trans-Canada Highway and is adjacent to the Northumberland Ferries terminal. The facility managed by the Authority is the 'heart' of the commercial fishing industry in northern mainland Nova Scotia.

The Authority has retained our firm to express its grave concerns regarding Northern Pulp's proposed new treatment facility, which includes an effluent pipe to discharge an estimated minimum of 62 million liters per day, into the mouth of Caribou Harbour. The

Authority's position is that the Northern Pulp's proposal fails to adequately address and in some cases completely fails to address various environmental and navigational concerns which could cause both short and long term harm to the facilities managed by the authority as well as its patrons.

Of major concern is that Northern Pulp's associated effluent will be harmful to the receiving waters of the Northumberland Strait and its marine life habitat. Northern Pulp is considered to be among the 70% of Canadian mills whose effluent has been proven harmful to the receiving waters into which it discharges. I will outline herein several of the Authority's major concerns with Northern Pulp's current proposal.

1. Northern Pulp's current proposal (section 8.11.2.4) confirms that there has been no testing completed with respect to the water composition of Caribou Harbour. Instead Pictou Harbour was used as a proxy for Caribou Harbour with respect to water quality. There is no explanation as to why water quality data for Caribou Harbour was "unavailable". The Authority views such an assumption on water composition as entirely inadequate. There are major distinctions between the two harbours which makes such an assumption tenuous at best. Pictou Harbour has been exposed to sewage from the Town of Pictou and other municipalities for over 200 years. In addition industrial waste from a ship yard, pulp mill, power plant, tire plant and many other businesses has been discharged into Pictou Harbour for over a century. Pictou Harbour also has three major feeding tributaries and Caribou Harbour only has one much smaller tributary. Caribou Harbour's water chemistry is potentially drastically different in comparison to Pictou Harbour.

In the Authority's opinion the assumption and lack of data falls far short of federal and provincial regulatory requirements under legislation such as the Pulp and Paper Effluent Regulations (PPER), the Fisheries Act, the Disposal at Sea Regulations under the Canadian Environmental Protection Act, 1999 (CEPA), and DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat (DFO 2014). The Authority submits that this lack of data and other aspects of Northern Pulp's environmental assessment indicate a 'rushed job' and which lacks substance.

2. The Northern Pulp proposal relies on a receiving water study prepared by Stantec. This study indicates that there will be minimal flow of effluent discharge into Caribou Harbour. The Authority's position is that the methodology used to make this erroneous determination is subpar and inadequate. A significant volume of water from the discharge location flows into Caribou Harbour on a rising tide. The patrons of the Authority will attest to the "allusion" of a rising tide at the proposed discharge point going mainly northwest, when this in fact, is false.

3. Section 6.5 of Northern Pulp's proposal suggests that fishermen have offered "no input to the outfall location". The Authority has been advised by its fisherman patrons that this is a false statement and that Northern Pulp's representatives were informed the entire area outlined and presented to the fishermen of Caribou Harbour, including the pipe route and outfall, is fished at one point or another throughout the year.

4. The Authority is very concerned that its patrons (both commercial and recreational) will have their navigational abilities under *Navigational Protection Act* restricted. This has simply not been addressed adequately in Northern Pulp's proposal. As previously noted herein the patrons of the Authority, in particular seventy (70) plus commercial fishermen, navigate directly across the path of the proposed pipe route in Caribou Harbour, on a daily basis, during regular fishing seasons of lobster, crab, herring and scallop seasons spanning April through November. Fishermen fishing north, northwest and west of the mouth of Caribou Harbour exit the marked channel between the third and fourth red buoys depending on destination daily – saving individual fishermen hundreds of miles of travel and reducing fuel consumption and reducing emissions. There appears to be a general lack of attention paid to these concerns. The Authority's position is that all navigation concerns must be addressed satisfactorily prior to any approval and not be left to be "figured out later".

5. The general consensus among the local fishermen and supported by the Authority is that proposed construction (highlighted on page 14, in appendix F of the proposal) will be insufficient to prevent ice damage. The Authority's experience is that a winter storm from the northeast shifts ice dramatically at mouth of Caribou Harbour. The ice piles up in the shallow water along the proposed pipe route, near the mouth of the harbour in excess of 5 meters. The silt and sand in this area is a 'moving bar' and the Authority does not believe that two (2) meters of pipe cover on this soft bottom is sufficient. A proper assessment would have to monitor the conditions of the ice over more than one winter season. As well an in-depth survey will be required as the density and hardness of the bottom varies dramatically, which will no doubt require further study to prevent pipe fatigue and stress cracking.

6. The dredging of Caribou Harbour in 2007, along the passenger ferry channel, required a Federal Assessment, as did the 2015 upgrading of PEI-New Brunswick Cable Interconnection Upgrade Project. Given that Northern Pulp proposes the dredging and installation of equipment in the same body of water the Authority's position is that this project contains all the criteria for a Federal Environmental Assessment as did the previous mentioned projects, as it pertains to section 67 of the CEAA 2012 Act. Section 67 of CEAA 2012 sets the framework for the environmental assessment of projects being carried out on federal land that are not considered designated projects and for which a full environmental impact assessment under the Regulations Designating Physical Activities is not required. As the seabed of the Northumberland Strait is federal crown land it is subject to requirements under section 67 of CEAA. Section 67 states as follows:

.....an authority must not carry out a project on federal lands, or exercise any power or perform any duty or function conferred on it under any Act of Parliament other than this Act that could permit a project to be carried out, in whole or in part, on federal lands, unless:

(a) The authority determines that the carrying out of the project is not likely to cause significant adverse environmental effects; or

(b) The authority determines that the carrying out of the project is likely to cause significant adverse environmental effects and the Governor in Council decides that those effects are justified in the circumstances under subsection 69(3).'

Based on the above the Authority's position is that this project is subject to review by a federal authority in order to determine whether the carrying out of the project will cause significant adverse effects on the surrounding environment, or if any potential significant adverse effects are justifiable.

The Authority requests that Northern Pulp's Effluent Treatment Project be designated a project for Federal Environmental Assessment under Section 14 of the Canadian Environmental Assessment Act (CEAA) 2012.

Please accept the Authority's legitimate concerns and address this crucial matter appropriately.

Yours truly,
MACISAAC CLARKE & DUFFY

cc Client

From: @mcclaw.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: March 4, 2019 1:25:06 PM

Project: replacement_effluent_treatment_facility_project Comments: Dear Sir or Madam and Ministers: Please be advised we represent the Harbour Authority of Caribou hereafter the "Authority", Pictou County, Nova Scotia. Located at the mouth of Caribou Harbour the Authority operates the busiest fishing port in Northern Nova Scotia. It is the hub of fishing activity from April to early December each fishing season. It is accessed via the 106 branch of the Trans-Canada Highway and is adjacent to the Northumberland Ferries terminal. The facility managed by the Authority is the "heart" of the commercial fishing industry in northern mainland Nova Scotia. The Authority has retained our firm to express its grave concerns regarding Northern Pulp's proposed new treatment facility, which includes an effluent pipe to discharge an estimated minimum of 62 million liters per day, into the mouth of Caribou Harbour. The Authority's position is that the Northern Pulp's proposal fails to adequately address and in some cases completely fails to address various environmental and navigational concerns which could cause both short and long term harm to the facilities managed by the authority as well as its patrons. Of major concern is that Northern Pulp's associated effluent will be harmful to the receiving waters of the Northumberland Strait and its marine life habitat. Northern Pulp is considered to be among the 70 of Canadian mills whose effluent has been proven harmful to the receiving waters into which it discharges. I will outline herein several of the Authority's major concerns with Northern Pulp's current proposal.

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2. The Northern Pulp proposal relies on a receiving water study prepared by Stantec. This study indicates that there will be minimal flow of effluent discharge into Caribou Harbour. The Authority's position is that the methodology used to make this erroneous determination is subpar and inadequate. A significant volume of water from the discharge location flows into Caribou Harbour on a rising tide. The patrons of the Authority will attest to the "illusion" of a rising tide at the proposed discharge point going mainly northwest, when this in fact, is false.
3. Section 6.5 of Northern Pulp's proposal suggests that fishermen have offered "no input to the outfall location". The Authority has been advised by its fisherman patrons that this is a false statement and that Northern Pulp's representatives were informed the entire area outlined

and presented to the fishermen of Caribou Harbour, including the pipe route and outfall, is fished at one point or another throughout the year. 4. The Authority is very concerned that its patrons both commercial and recreational will have their navigational abilities under Navigational Protection Act restricted. This has simply not been addressed adequately in Northern Pulp's proposal. As previously noted herein the patrons of the Authority, in particular seventy 70 plus commercial fishermen, navigate directly across the path of the proposed pipe route in Caribou Harbour, on a daily basis, during regular fishing seasons of lobster, crab, herring and scallop seasons spanning April through November. Fishermen fishing north, northwest and west of the mouth of Caribou Harbour exit the marked channel between the third and fourth red buoys depending on destination daily "saving individual fishermen hundreds of miles of travel and reducing fuel consumption and reducing emissions. There appears to be a general lack of attention paid to these concerns. The Authority's position is that all navigation concerns must be addressed satisfactorily prior to any approval and not be left to be "figured out later". 5. The general consensus among the local fishermen and supported by the Authority is that proposed construction highlighted on page 14, in appendix F of the proposal will be insufficient to prevent ice damage. The Authority's experience is that a winter storm from the northeast shifts ice dramatically at mouth of Caribou Harbour. The ice piles up in the shallow water along the proposed pipe route, near the mouth of the harbour in excess of 5 meters. The silt and sand in this area is a "moving bar" and the Authority does not believe that two 2 meters of pipe cover on this soft bottom is sufficient. A proper assessment would have to monitor the conditions of the ice over more than one winter season. As well an in-depth survey will be required as the density and hardness of the bottom varies dramatically, which will no doubt require further study to prevent pipe fatigue and stress cracking. 6. The dredging of Caribou Harbour in 2007, along the passenger ferry channel, required a Federal Assessment, as did the 2015 upgrading of PEI-New Brunswick Cable Interconnection Upgrade Project. Given that Northern Pulp proposes the dredging and installation of equipment in the same body of water the Authority's position is that this project contains all the criteria for a Federal Environmental Assessment as did the previous mentioned projects, as it pertains to section 67 of the CEAA 2012 Act. Section 67 of CEAA 2012 sets the framework for the environmental assessment of projects being carried out on federal land that are not considered designated projects and for which a full environmental impact assessment under the Regulations Designating Physical Activities is not required. As the seabed of the Northumberland Strait is federal crown land it is subject to requirements under section 67 of CEAA. Section 67 states as follows: "1. an authority must not carry out a project on federal lands, or exercise any power or perform any duty or function conferred on it under any Act of Parliament other than this Act that could permit a project to be carried out, in whole or in part, on federal lands, unless: a The authority determines that the carrying out of the project is not likely to cause significant adverse environmental effects or b The authority determines that the carrying out of the project is likely to cause significant adverse environmental effects and the Governor in Council decides that those effects are justified in the circumstances under subsection 693." Based on the above the Authority's position is that this project is subject to review by a federal authority in order to determine whether the carrying out of the project will cause significant adverse effects on the surrounding environment, or if any potential significant adverse effects are justifiable. The Authority requests that Northern Pulp's Effluent Treatment Project be designated a project for Federal Environmental Assessment under Section 14 of the Canadian Environmental Assessment Act CEAA 2012. Please accept the Authority's legitimate concerns and address this crucial matter appropriately. Yours truly,

cc Client Name: Client: Harbour Authority of Caribou,
Email: @mcdlaw.ca Address:

Municipality:

Privacy-Statement: agree x: 53 y: 25



Nova Scotia Salmon Association

202 Cloverville Rd.
Antigonish, Nova Scotia, B2G 2M8



Atlantic Salmon Federation
Fédération du Saumon Atlantique
P.O. Box 396, Chester, Nova Scotia, B0J 1J0

March 5, 2019

Replacement Effluent Treatment Facility Project
Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442
Halifax, NS, B3J 2P8



To Whom It May Concern:

We are writing on behalf of the Nova Scotia Salmon Association (NSSA) and the Atlantic Salmon Federation (ASF) concerning the environmental assessment (EA) of the proposed replacement effluent treatment facility being advanced by Northern Pulp Nova Scotia Corporation. The NSSA and ASF have a good working relationship with the proponent, as Northern Pulp Nova Scotia Corporation has been supportive of our salmon recovery work through numerous in-kind contributions, and we actively consulted with the company in the lead up to their EA filing. However, upon reviewing the environmental assessment registration document, we have concerns and reservations about the proposed project and its potential effects on wild Atlantic salmon and the ecosystem that supports them in this important region.

Nova Scotia's Northumberland Strait coastline is home to 15 salmon bearing rivers between Amherst and Antigonish. Part of the Southern Gulf of St. Lawrence population complex, Atlantic salmon in this area have been assessed as a *species of special concern* by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). This designation was assigned due to long-term trends of population decline and a multitude of current threats. COSEWIC members also considered the fact that nearby Atlantic salmon populations have been listed as endangered under Canada's *Species at Risk Act*, or have been recommended for an endangered listing.

The designation of Atlantic salmon in this area as a species of special concern is important to the environmental assessment process because salmon are an ecological keystone species that provide insight and perspective to the status of other foundational fish like gaspereau and smelt. The health of salmon populations is a general indicator of overall ecosystem health. We therefore feel it is especially important that the principles and values espoused by the N.S. Environment Act be rigorously applied to this and other developments in the area.

During consultations with Northern Pulp prior to the EA filing, we identified several areas with respect to wild Atlantic Salmon where their research was data-deficient. We offered to assist in gathering the information required. The most concerning deficiency was a lack of information with respect to how the proposed outfall impact zone will overlap with salmon migration routes and salmonid congregation points spatially and temporally at critical life stages. This data gap was not addressed, but is noted by the proponent in their EA filing (Section 8.6.2.4 page 217). Although the effluent coming out of the outlets will meet specifications of federal *Pulp and Paper Effluent Regulations*, those regulations mandate that the effluent be further diluted within a prescribed distance from the outlet. These dilutions are necessary to ensure the receiving water meets acceptable parameters for biological oxygen demand, chemical oxygen demand, temperature, salinity, etc. in order to ensure aquatic life will not be harmed and ecosystems not disrupted.

Given the need for dilution, even compliant designs will create an impact zone where negative effects will occur. To fully understand the risks posed by this impact zone it is crucial to understand how the impact zone will overlap spatially and temporally with sensitive species, such as Atlantic Salmon in this area. Without this baseline data it is not possible to predict impacts or monitor and validate actual impacts once the facility is in operation. This severe limitation has been raised with the Provincial Fisheries Minister's staff and the proponent.

There was also a deficiency with respect to the impact zone modelling done by the proponent. Although we recognize modelling necessitates some educated guesswork, the assumptions used in the EA registration document, such as ambient temperatures and time of year, were not in line with when wild Atlantic salmon would likely be present in the impact zone, i.e. during the spring and fall congregation and migration periods. It is clear from the filing documents that there is some misunderstanding by the proponent of the biology and behavior of the species involved. For example, they cite papers noting that Atlantic salmon swim in the upper portion of the water column and suggest there will be a minimal impact because the outlet pipes are on the seafloor. This assumption is incorrect because while migrating Atlantic salmon are indeed pelagic (associated with the water column) as opposed to benthic (associated with the sea floor) the shallowness of the depths involved with the outfall and the impact zone will be well within the zone that would be occupied by salmon, and many other important fish species, migrating and congregating in that geographic area.

We were disappointed upon seeing Northern Pulp's EA filing that deficiencies identified ahead of time were not addressed and there does not appear to be a plan to do so. This is a major oversight that needs to be corrected before any consideration of releasing the project from the assessment process. Given the potential for negative impacts, the threats currently faced by salmon, and what they represent within the ecosystem, we cannot afford to have this or any other operation cause unintended negative consequences. It is therefore essential to the ongoing environmental assessment process that proper baseline data is collected over the appropriate spatial and temporal scale. It is only with proper baseline data that the extent of potential impacts can be assessed, that effective monitoring can occur, and that mitigation and adaptive management plans can be developed and implemented as necessary.

From our research and consultations, we have also identified several other areas of concern that are not adequately addressed in the proponent's EA documents. For example, compared to Boat Harbour, the new treatment facility will reduce the capacity to hold untreated effluent in the event of an emergency from 30 days down to a proponent-estimated 8-12 hours. Although it is known to occur, there is no publicly available information on how often an untreated effluent is required to be held each year and the duration of those periods. Given the size, age, and complexity of the mill, a capacity of only 8-12 hours seems insufficient for operators to identify and rectify problems, or to idle the plant while the problem is being fixed. The filing is also vague on how the proponent is planning to provide real-time monitoring of the effluent and how the company will deal with other emergency issues associated with effluent treatment and containment. Given the current regulations surrounding monitoring of effluent (monthly acute lethality testing) coupled with this uncertainty in monitoring and holding capacity this would mean that untreated effluent could potentially be discharged for a significant period of time before it would be detected and stopped by the proponent or detected by legally mandated monitoring. This is a serious concern. Therefore the holding capacity issue and emergency action plans involving effluent treatment and mill idling need to be addressed within the filing documents in order to properly assess the potential

impacts of this project and develop appropriate monitoring and reporting conditions for the facility's operation.

Another area of concern is with the transition in effluent systems from the current Aerated Stabilization Basin treatment (ASB) system to the proposed biological Activated Sludge Treatment (AST) system. While these newer systems have shown they can provide higher BOD reduction efficiency, they are more susceptible to settling issues and disruption to the biological community that is central to this effluent treatment process. So called biological upset can occur regularly if not carefully managed by experienced operators. Therefore, this new system will require more highly trained operators and more testing to maintain effluent below legally required levels. The EA filing does not address these challenges associated with the changeover in process. The filing documents do not identify what testing will occur to ensure that the new system will be working efficiently and within desired parameters prior to the switch over from the ASB system nor the mechanisms that will be put in place to ensure proficiency of their operators and the operational procedures for the new facility. There is also a lack of information concerning procedures for detecting and mitigating known issues such as biological shock, bulking, or for other failures within the treatment facility or within the mill. Failures in any one of these areas could lead to untreated effluent being pumped into Northumberland Strait, relying only on voluntary transparency by the proponent and the federally mandated monthly testing to detect the issue. This is a significant failure in the EA. More information is required before an informed decision can be reached on this project.

The outfall diffuser location is also an area of concern. The proposed location of the outfall diffusers is just beyond the inlet to Caribou Harbour. This area is known to have issues with sedimentation, infilling, and ice scour. It is not clear from the EA filing if this has been considered and how infilling may affect the performance of the diffusers. It is conceivable that it could result in blockages that would disrupt the diffusion patterns that are needed to ensure proper mixing to get the effluent within the legally required tolerance levels at the prescribed distances from the outflow pipe. As there is no information on the spatial and temporal distribution of fish migration routes or congregation points it is difficult to predict how changes to diffusion patterns could affect salmonids and other species. Additionally, the concealed nature of the diffusers means that issues with the effluent or with the diffusion pattern may not be detected in a timely manner.

On behalf of NSSA, ASF, our affiliates, associated members, and volunteers we urge the NS Environmental Assessment Branch to require that this project be subject to the most rigorous standards to ensure that this highly sensitive and ecologically important area is protected. The provincial Level 1 EA submitted by the proponent is insufficient for achieving this standard. Due to the potential to release deleterious substances and threaten species at risk and the potential to have multijurisdictional impacts, this review should be conducted via the federal environmental assessment process. Regardless of that decision, we will continue working to ensure that the best interests of the ecosystem and salmonids are represented and protected.

Sincerely,

President
Nova Scotia Salmon Association

Director of NS and PEI Regional Programs
Atlantic Salmon Federation

From: @ns.sympatico.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: February 13, 2019 4:02:24 PM

Project: replacement_effluent_treatment_facility_project Comments: February 12, 2019
Margaret Miller NS Minister of Environment: To Whom It May Concern: Re: Northern Pulp and its Replacement Effluent Treatment Facility Project Save Our Seas and Shores is a non-partisan coalition of fishers, First Nations and concerned citizens who have been advocating protection of the Gulf of St Lawrence for decades. We are engaged in 5 provinces because the Gulf of St Lawrence is a fragile inland sea which shares its waters, fish and coastlines with NS, NB, PEI, QC and NL. It has counter clockwise currents that only empty into the Atlantic once a year. This vulnerable body of water is home to thousands of marine species including lobster, herring, mackerel, snow crab, ground fish, Atlantic salmon, endangered right whale, blue whale, humpback whale, Leatherback turtle and harlequin duck, to name a few. It is considered one of the most precious marine ecosystems on Earth and according to DFO, has sensitive life stages of marine organisms present year around. Because of these shared waters, it can only be legitimately studied in its entirety. This is because water and fish do not recognize provincial boundaries neither does kraft bleached pulp mill effluent which is considered to be one of the most toxic industrial pollutants ever created by humans to enter our marine environment. These toxic effluents have been bio-accumulating and assaulting our oceans and marine species for over half a century. We are writing today regarding the pipe being proposed by Northern Pulp to dump 70-90 million litres of heated kraft pulp mill effluent into the Northumberland Strait. Briefly, we would like to acknowledge that Premier Stephen McNeil's government is the first government in 52 years to announce the pending closure of Boat Harbour in 2020" an atrocity that has been inflicted on Pictou Landing First Nations for over half a century. We applaud this government for taking this action. The problem is, moving Boat Harbour's toxic effluent from Boat Harbour into the Northumberland Strait is not a feasible solution in 2019. This isn't the same gulf that was there in 1967. It's the same expanse of water, but it is now highly stressed. We're seeing plankton levels down 50 per cent from what they were four or five years ago, and now the federal government is predicting the cod fishery will be extinct in a few years. A six-year-old fish today weighs what a four-year-old fish did 10 years ago. As it stands, this Kraft pulp mill in Abercrombie, Nova Scotia has a fifty year history of environmental negligence in Pictou County and its current plan for an effluent pipe puts the delicate ecosystem of the Gulf of St. Lawrence at major risk. Discharging 70 - 90 million liters of bleached Kraft pulp effluent daily into the Gulf of St. Lawrence will have a significant negative impact on the fragile and sensitive spawning, nursery and migratory habitat of lobster, herring, mackerel and many other species. This in turn, will threaten tourism and fishing industries in Nova Scotia, Prince Edward Island, New Brunswick, Newfoundland and Quebec, which support a global food supply and generate billions of dollars in economic activity. Furthermore, the economic backbone of our Maritime economy and the thousands of commercial fishers in the Northumberland Strait and the five provinces bordering the Gulf of St. Lawrence, depend on these sustainable fisheries to support their families and the hundreds of coastal communities in which they live. Compounding this matter is the inherent conflict of interest the NS Dept of Environment is in, as the owner and operator of this over entitled pulp mill's waste treatment facility. In the public's interest and trust, how can you possibly, in good faith and transparency, oversee and determine the viability of an environment assessment of this same waste treatment facility while you are, in fact, a business partner of this mill? It is an irreconcilable conflict, in our coalition's humble opinion. For the record, the Gulf of St

Lawrence is already considered one of the most rapidly de-oxygenating bodies of water on earth. In short, if we as humans are to save this extremely vulnerable body of water, we need to stop dumping our industrial waste into it. PERIOD. Therefore, we implore you: You must say NO to this reckless proposal of a pipe into the Northumberland Strait and Gulf of St Lawrence. While we applaud this government's impending closure of Boat Harbour, to complete this Historic action in good faith, and in terms of real and genuine reconciliation with Pictou Landing First Nations, the only viable long term solution is this - You must STOP this effluent from entering our marine environment. NOW. Respectfully submitted,

Save Our Seas and Shores Coalition Box 47 Merigomish, NS

B0K1G0

<http://www.saveourseasandshores.ca> Name: Save

Our Seas and Shores Coalition

From: @gmail.com>
Sent: March 8, 2019 3:12 PM
To: Environment Assessment Web Account
Subject: Northern Pulp Assessment
Attachments: Hon M Miller - Env Assessment.doc

Dear Minister Miller;

Attached and below please find our concerns re:

Northern Pulp's Replacement Effluent Treatment Facility Project.

Thanks for your consideration,

on behalf of the North Shore Nova Scotia Chapter, Council of Canadians

March 6, 2018

Honourable Margaret Miller
Minister of Environment
Nova Scotia Environment
PO Box 442
Halifax, NS B3J 2P8

Submitted via email ea@novascotia.ca

Dear Minister Miller,

On behalf of the North Shore Council of Canadians, I am writing to you with respect to **Northern Pulp's Replacement Effluent Treatment Facility Project.**

Founded in 1985, the Council of Canadians is Canada's leading social action organization, mobilizing a network of 60 chapters across the country, including the NORTH SHORE NOVA SCOTIA chapter covering the north shore from Pictou to Pugwash.

Through our campaigns we advocate for clean water, fair trade, green energy, public health care, and a vibrant democracy. The Council of Canadians is a registered non-profit organization and does not accept money from corporations or governments.

In making your decision under subsection 34(1) of the *Environment Act* and with respect to Section 12 of the Environment Assessment Regulations, we urge you to consider the following points:

1. Concerns expressed by aboriginal people

On January 31, 2018, members of the North Shore Council of Canadians travelled to Pictou Landing First Nation (PLFN) to take part in the community's official one year countdown of the Boat Harbour Treatment Facility.

Member after member of the PLFN, from school children to elected leaders, spoke passionately about the many losses they have suffered since the pulp mill effluent was first piped into the nearby estuary of Boat Harbour in 1967. These losses include a valuable fishery, medicinal plants, recreational use of the water and use of surrounding land for traditional cultural practices. In 2014, a break in the pipe leaked 47 million litres of pulp effluent onto PLFN land damaging much infrastructure.

There is no question that the community of PLFN expects the province to honour the *Boat Harbour Act* and close the current effluent treatment plant on schedule in 2020.

We urge the Minister not to grant Northern Pulp's last minute request to delay the closure and remediation of Boat Harbour. There have been too many broken promises to the PLFN community.

2. **Risk to Pictou watershed**

Northern Pulp's route for their new effluent pipe to the Northumberland Strait crosses the town of Pictou's watershed and the Caribou wellfield, a source of domestic drinking water for the town and some people in the area.

The Council of Canadians is a leader in fights to protect Canada's freshwater sources. Maude Barlow, Honorary Chairperson of the Council of Canadians, served as Senior Advisor on Water to the 63rd President of the United Nations General Assembly and was a leader in the campaign to have water recognized as a human right by the UN.

Communities and governments must not ignore threats to water security such as the threat posed by an effluent pipe leak from Northern Pulp.

There is a documented history of leaks from Northern Pulp's effluent pipe. This suggests that there is a very good probability of leaks from an effluent pipe in the future.

The consequences of an effluent leak into the Pictou watershed could be catastrophic. Such an event would not be easily or cheaply reversed, if indeed mitigation was even possible.

We urge the Minister not to put the drinking water of the town of Pictou at risk.

3. **Inadequate community consultation and time for meaningful response**

The public consultations failed to include all of the communities affected by the Northern Pulp Replacement Effluent Treatment Facility Project.

Communities outside of the immediate geographic areas of the PLFN and town of Pictou were not afforded public consultation opportunities, despite the fact that air emissions travel to these communities. People know the air emissions travel because on some days, there is an obvious smell from the mill.

Furthermore, the proposed treatment system runs the risk of harming sustainable industries all along the North Shore. The tourism industry prides itself on warm, clean water and world class sandy

beaches. The commercial fisheries relies on sustainable wild shellfish that is shipped all across the world. Communities such as Wallace, Tatamagouche and River John, for example, are all identified as sharing in the Northumberland Strait “brand”. Even if only one part of the Northumberland Strait suffers environmental damage from Northern Pulp’s effluent pipe, it will be impossible for other communities and their tourism and seafood businesses to disassociate themselves from that negative image.

Additionally, the 30-day period for public response to some 2,000 pages of technical documents does not permit meaningful citizen review and input.

We urge the Minister to ensure meaningful public consultations in all Nova Scotian communities along the Northumberland Strait.

To conclude, we urge you to respect the precautionary principle in weighing the information before you. The risks to our health, environment and community well being are high.

Given all that is at stake, we are calling on you to reject the proposed Northern Pulp Replacement Effluent Treatment Facility Project.

Sincerely,

for Shore Nova Scotia Chapter, Council of Canadians
[@gmail.com](mailto:forshore@shoresc.ca)

From: South Shore Council of Canadians
To: [Environment Assessment Web Account](#)
Subject: Submission: Replacement Effluent Treatment Facility Project
Date: March 9, 2019 8:11:45 AM

TO: Environmental Assessment Branch, Nova Scotia Environment, EA@novascotia.ca

Dear Minister Miller:

I am writing to you on behalf of the South Shore Chapter of the Council of Canadians. We are part of the national Council of Canadians, Canada's largest citizen advocacy organization. Our chapter promotes education, discussion and action on significant issues affecting our lives.

We call on the Nova Scotia government to reject the proposed Northern Pulp Replacement Effluent Treatment Facility Project based on the following key points which have been outlined by the groups based in the communities most affected by this issue.

Northern Pulp has been unable to prove that there will not be significant risk. Their claim that damage will be 'minimal' is not good enough. We cannot allow this company to put our fisheries, tourism and outdoor recreation industries at risk.

Northern Pulp has failed to meet the requirement of consent from the local Indigenous population. Pictou Landing First Nation is opposed to this proposal.

At a time when Nova Scotia has paid lip service to a just transition to a sustainable economy, and at a time when the IPCC report issued in 2018 has warned us that we have only 11 years to curb GHG emissions, this path is foolhardy for our province to pursue. We need to take all available steps to protect our ocean and our province.

We call on the Government of Nova Scotia to reject the proposed Northern Pulp Replacement Effluent Treatment Facility Project. We fully support the closure of the effluent treatment facility in Boat Harbour on schedule.

(for South Shore Chapter of the Council of Canadians)

The Council of Canadians is Canada's largest citizen advocacy organization. Nova Scotia's South Shore Chapter promotes education, discussion and action on significant issues affecting our lives. www.facebook.com/SouthShoreCouncilofCanadians www.canadians.org

(If you no longer wish to receive emails from the South Shore Council of Canadians, please ask to be removed from our mail list.)

From: @sierraclub.ca>
Sent: March 9, 2019 11:45 PM
To: Environment Assessment Web Account
Subject: Comments on the Northern Pulp Nova Scotia Corporation's proposed Replacement Effluent Treatment Facility (ETF) Project
Attachments: SCCF_NS_EA_NorthernPulp_Mar_9_2019.pdf

To whom it may concern:

Please find attached comments from Sierra Club Canada Foundation on the Northern Pulp Nova Scotia Corporation's proposed Replacement Effluent Treatment Facility (ETF) Project.

Yours truly,

National Programs Director

--



National Program Director

Toll-free: 1.888.810.4204

Visit our [website](#). Like us [Facebook](#).
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Our success depends on the support of like-minded individuals and organizations. Please [donate](#) today.



Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442, Halifax, Nova Scotia B3J 2P8
Sent by Email: ea@novascotia.ca

Re: Comments on the Northern Pulp Nova Scotia Corporation's proposed Replacement Effluent Treatment Facility (ETF) Project

March 9, 2019

To whom it may concern:

Please find below our comments regarding the Northern Pulp Nova Scotia Corporation's proposed Replacement Effluent Treatment Facility (ETF) Project.

We recommend that the Minister of Environment reject this project because it will cause adverse and significant environmental effects that cannot be mitigated. We are also deeply concerned that no federal impact assessment has been performed on the proposed project, since the project will result in transboundary impacts on fish, fish habitat, fisheries, seabirds, and endangered species. Without federal impact assessment, this process cannot fully assess the impacts of the proposed project.

The issue of pollution from Northern Pulp and its predecessors has negatively impacted the environment, health, and social fabric of Pictou County and the region for decades. It is both a literal and figurative toxic legacy of half a century of environmental racism. Allowing continued pollution of the environment and, in particular, allowing continued negative impacts on indigenous communities via this project would impede our responsibility to engage in reconciliation and our obligation to uphold the UN Declaration of the Rights of Indigenous Peoples.

Upon rejecting the proposed project, we recommend that the Minister, with leadership from Nova Scotia's Premier, Mi'kmaq leaders and elders, and federal representatives proceed immediately to work with Pictou Landing First Nation and surrounding communities to develop a sustainable development plan for the region.

Sincerely,

National Programs Director

Sierra Club Canada Foundation – CRA Charity # 11914 9789 RR0001
PO Box 2007 Stn B, Ottawa Ontario K1P 5W3
Tel. (613) 241-4611, Toll Free 1-888-810-4204
sccfoundation@sierraclub.ca, www.sierraclub.ca

1. EA Registration document inadequately assesses the sensitivity of the proposed receiving environment for effluent: the Northumberland Strait in the Southern Gulf of St. Lawrence.

The Gulf of St. Lawrence is a semi-enclosed sea that is vitally important to thousands of marine species, including endangered whales and fish. Coastal communities and renewable industries such as fishing and tourism rely on this productive but threatened ecosystem.

The EA registration document fails to incorporate the vulnerability of the Gulf, and in particular, two recent findings on its vulnerability:

1. Impacts of climate change altering ocean currents and creating hypoxic conditions. Researchers found that the Gulf of St. Lawrence will be impacted by these effects more than any other marine ecosystem on the planet (Rapid coastal deoxygenation due to ocean circulation shift in the northwest Atlantic. *Nature Climate Change*. 8: 868–872. <https://www.nature.com/articles/s41558-018-0263-1>); and
2. Department of Fisheries and Oceans scientists have warned cod in the Southern Gulf are on the verge of extirpation (Continued decline of a collapsed population of Atlantic cod (*Gadus morhua*) due to predation-driven Allee effects. *Canadian Journal of Fisheries and Aquatic Sciences*, 2019, 76(1): 168-184, <https://doi.org/10.1139/cjfas-2017-0190>).

Continued stressors on this ecosystem, such as the release of large volumes of warm effluent containing nutrients and pollutants will contribute to further degradation of this ecosystem.

2. Risks of mercury contamination inadequately assessed

The EA Registration document fails to identify or assess impacts of construction and operation of the proposed treatment facility near an existing mercury waste dump and mercury contaminated soil.

According to research unearthed by Joan Baxter and published in the *Halifax Examiner*, a mercury containment site and mercury contaminated soil are present at the proposed effluent treatment site ([Northern Pulp's environmental documents: missing mercury, a pulp mill that never was, and oodles of contradictions](#). Mar 5, 2019).

The EA document fails to evaluate the risks associated with disturbing this contaminated soil and mercury containment site on the environment, human health and local fisheries.

3. Information on pollutants (including heavy metals, dioxins, and furans) contained in effluent to be released into the environment is inadequate

The EA does not identify amounts, concentrations and make-up of pollutants (such as heavy metals, dioxins, furans) being released from the proposed treatment facility. On a precautionary basis, the assessment should identify the various potential pollutants to be released, the range of possible concentrations, and means taken to ensure these remain a safe levels. Instead, the EA lists potential pollutants but does not evaluate the range of possible effluent characteristics. As a result, the risk to the environment and human health are not adequately assessed.

A study performed by the Mi'kmaq Conservation Group and [sampling undertaken by Nova Scotia Environment](#) after the 2014 spill of effluent from a pipeline leak indicate that dioxins, furans, and mercury

are still present in effluent released by Northern Pulp. This research is absent from the document's Human Health Evaluation ([Section 9.0](#)), and should be included in evaluating risks.

Complete information on pollutants to be released from the pipe (identity of pollutants, range of concentrations and seasonal variability) are not adequate to assess effectiveness of mitigation measures proposed or risks to environment and human health.

4. EA process has allowed inadequate time and capacity for consultation

The time and capacity provided to experts, stakeholders, and community members to engage in this environmental assessment process has been inadequate to fully assess risks.

From: nsthrc@tourism.ca
To: [Environment Assessment Web Account](#)
Subject: Proposed Project Comments
Date: March 8, 2019 3:15:16 PM

Project: replacement_effluent_treatment_facility_project Comments: Tourism Industry Association of Nova Scotia TIANS RESPONSE to Environmental Assessment from Northern Pulp Tourism in Everybody's Business and occurs in every community and every corner of Nova Scotia yet the topic of Tourism only warranted one page 483 in the NP Environmental Assessment that the Tourism Industry Association of Nova Scotia TIANS addresses with this communication. The release of Northern Pulp's Environmental Assessment was extremely disappointing in relation to their analysis of the tourism economy and the potential impact of treated effluent. The Business of Tourism cumulatively is big business in Nova Scotia, constantly growing in contribution to the Nova Scotia economy and generating \$2.7 Billion in 2017. This translates to over \$300 million in tax revenue for all levels of government revenue which is invested by governments to pay for social services like health care, education and infrastructure. Tourism employs over 40,000 people and generates \$3.2 for every \$1 invested the largest multiplier effect of all sectors. Along with creating jobs and driving tax revenue, tourism enhances the social condition of our communities and supports a healthy and sustainable natural environment. Nova Scotia is blessed with incredible natural beauty and our enviable location by the sea makes Nova Scotia a much sought-after destination. This strategic location on the Atlantic Coast has provided us with tremendous opportunities, as we utilize our seacoast location to build our brand and develop products and services which provide unique experiences and access to the sea. Recreation/Adventure Tourism and Culinary Tourism are two of the fastest growing segments and all of the new products rely on a healthy and sustainable marine environment. The business drivers are the environment and quality experiences. The perception and demand are pristine areas "beaches, water and landscapes. With the warmest waters north of the Carolinas, there is an anticipation of a beach experience and uncontaminated waters. Toxic waste diverted to the Northumberland Strait will affect visitor perception and experience. According to the latest tourism statistics, tourism revenue in the Northumberland Shore Region is 7.8 of the total tourism revenues translating to \$210.6 Million . The NP EA states 8.3 and \$215 Million. Pictou County estimates are 3 or \$81 Million. However, the length of stay in the Town of Pictou has declined from 2010, an average of 3.3 days to 2017 at 2.5 days. Tourism Operators explain the decline in visitor stay is a direct result of the various factors emanating from the effect of the Northern Pulp Mill. The reference to Tourism, on page 438, does a disservice to the importance that tourism plays in the region and the significant economic damage from the environmental risks proposed by Northern Pulp's plan. TIANS is extremely concerned about the socio-economic effect on the Tourism Industry. Not only does this threaten the marine environment, it puts at risk other important economic sectors, including fisheries. Culinary Tourism, presently enjoying tremendous growth and recognition, is directly dependant on a healthy fishery. Nova Scotia lobster is widely marketed as a prominent feature of the Nova Scotia experience. The health of their larvae is essential to its sustainability both as a domestic and international product. The Indigenous Tourism product is also a significant growth opportunity. In fact, the Conference Board of Canada just released the latest data and noted Indigenous Tourism growth is outpacing Canadian tourism activity overall. The research shows the direct economic benefits GDP attributed to the Indigenous Tourism sector in Canada rose 23.2 per cent between 2014 and 2017, going from \$1.4 billion to \$1.7 billion. The Nova Scotia Indigenous product has tremendous potential for growth. Nova Scotia has a history of looking at short term economic vs. long term sustainable growth and pitting one sector against another. The deference to the

Pictou Mill in spite of the strength and importance of Tourism and Fisheries is an example of this. The legacy of Northern Pulp is Boat Harbour, an example of extreme environmental damage that is supported by Health Canada statistics within the Pictou region. With an environmental cleanup worse than the Sydney Tar Ponds, now the responsibly of the Nova Scotia government, it is incredulous that any consideration would be given to research commissioned by this Company that purports no negative impact of other economic sectors. In 2017, Dalhousie released a study on the health of the Gulf of St. Lawrence and noted increasing dead zones as a result of commercial and industrial activity and effluent. The Northumberland Strait connects and empties into to the Gulf of St. Lawrence and the Laurentian Channel within the Gulf. Another study by Brennan, Blanchard and Fennell published in December 2016 discusses the stresses already endured in the Gulf of St. Lawrence and the Scotian Shelf and purports the concept of temperature and oxygen in this area and devastating effect on marine life. The Northumberland Strait therefore is facing threats to the fisheries. The vision for Environmental Goals and Sustainability Act was to have Nova Scotia recognized as one of the cleanest, greenest jurisdictions in the world by 2020 , plans such as this totally contradict this effort. Recently, Destination Canada - Canada's national marketing organization - announced a second consecutive record-breaking year with 21.13 million travellers to Canada in 2018. Tourism generates 745,300 jobs in communities across Canada and contributes an estimated \$102.5 billion to the economy. Tourism is transforming the Atlantic Canada economy and continued success will be reliant on a healthy environment. FACT: Tourism's Impact Tourism Employs 40,000 Nova Scotians Forestry Employs 11,500 Tourism Contributes \$300 Million to NS's Tax System Forestry Contributes \$79 Million Endnotes i. Source: NS Tourism .The NP EA states 8.3 and \$215 Million ii. Conference Board of Canada and TIAC, February 2019 <https://indigenoustourism.ca/corporate/conference-board-of-canada-research/> iii. Media Release Faculty of Science, Dalhousie University June 7, 2018. <http://memg.ocean.dal.ca/news/2018forecast.html> iv. <https://doi.org/10.1371/journal.pone.0167411> v. EGSPA quote: NS Department of Environment website: Nova Scotians have a cleaner, greener and more economically stable province because of commitments government has made to become one of the most environmentally and economically sustainable places in the world by 2020 Name: Tourism Industry Association of Nova Scotia TIANS Email: nsthrc@tourism.ca Address: 2089 Maitland Street Municipality: Halifax, NS Postal-Code: B3K 2Z8 Phone: 902 423 - 4480 Fax: 902 422 - 0184 email_message: Privacy-Statement: agree x: 71 y: 17



UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

UA Local Union:

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Antigonish County, Nova Scotia, B0H-1X0
Phone 902-386-2551/Fax 902-386-2006
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Subject:

Mark McManus
General President
Patrick H. Kellee
General Secretary-Treasurer
Michael A. Plessant
Assistant General President

March 9/2019

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442
Halifax, NS, B3J 2P8
Fax: (902) 424-6925



Replacement Effluent Treatment Facility Project.

Attachments

- Term Employees Employed at Northern Pulp 2018
- No Plan B Possible Forestry Sector - Northern Pulp/Paper Excellence Canada

The following comments are submitted on behalf of the Membership of UA Local 244 Antigonish Plumbers, Pipefitters, Welders, Instrument Technicians and Apprentices.

Our comments include concerns of the entire Construction Industry Management and Labour.

My name is | , Business Manager of UA Local 244.

I am a Red Seal Steamfitter - Pipefitter by Trade.

My first Industrial Job was the Pulp Mill currently owned by Northern Pulp.

Most of our comments will refer to negative socio economic issues.

Northern Pulp is a Company that puts 2.1 Billion Dollars Per Year into the Provincial Economy.

We have an experienced Construction Industry to build the new Effluent Plant.

We will leave technology and scientific comments to the Professionals in those areas.

The Construction Industry has not been included in any of the negatively affected Groups, that would lose jobs.

The attached "Term Employees" indicates Trades People who worked directly for Northern Pulp during 2018 when extra help was needed inside the Mill.

That totals 180 Employees and \$1,409,715.52 for the year. This has continued over the 52 years that Mill has been there and in most years the numbers were much greater . This number does not include other Trades People and Employees of Contractors who were employed in the Mill. The new Effluent Plant would be an 18 Month Project.

A Brief History

Many of the Senior Nova Scotia Tradespeople worked at the Mill in 1965-66-67 during Construction.

Fishing was so bad up in River John, Tatamagouche, Wallace and Pugwash Areas that many fisherman from the Area joined the Construction Unions and only a very few left the Mill during Construction to go fishing .

The hourly rate for Pipefitters at the time as \$3.80 per hour and that was more than a Lobster Fisherman could make at the time.

To this day a large number of Fisherman are Tradespeople in the Construction Industry when Fishing Seasons are closed.

For about the first 30 years or more the effluent was black going into Boat Harbour and black going out into Pictou Harbour from where it went out into the Strait. Not that it was a good thing but the Fishing Industry has been thriving during the past 52 years without negative effects from the Mill.

Recently a Fisherman Friend told me that the prevailing water flow in the Strait goes up and around Prince Edward Island. That would mean the effluent from the Mill would also be going the same direction and there has been record lobster catches up around the Prince Edward Island Causeway in recent years.

Plan B - There is none!

Any long term Nova Scotia Taxpayer would remember how successive Governments of all the Party's spent massive amounts of Taxpayer money on "Make Work Projects" that produced little or nothing. Probably in the billions.

Northern Pulp wants to Clean Up the mess they inherited when they bought the Mill in 2011. Whether it was previous Owners or previous Governments that wanted to run Boat Harbour. None of it should of happened the way it did.

That is all in the past and Northern Pulp is not responsible for it.

Everyone needs to face up to the fact that Rural Nova Scotia has not been doing well for many years. Northern Pulp is the Key Player in a highly integrated supply and demand system that the whole economic system benefits from.

Everyone loses when a major Industry shuts down.

Even those who would think of it as a win would soon realize:

- their taxes are going up,
- they can't sell their property for half of what it is worth,

- Hospitals will become First Aid Stations,
- Schools would close because the last of your Family Members will have to move away to find work.
- Poverty, Employment Insurance and Welfare will all dramatically increase.

I repeat THERE IS NO PLAN B and there never has been one.

There is a Plan A however. Leave good enough alone!

Grant Northern Pulp an extension on the use of Boat Harbour until the new Effluent Plant is up and running. The Nova Scotia Government should pay the Natives in Pictou Landing a negotiated amount for their inconvenience.

There is a Win Win Solution for every problem if enough effort is put forward.

I agree that the Residents of Pictou Landing and Surrounding Area have been negatively affected by the whole Boat Harbour fiasco for Fifty Two years. I also agree that it should be closed but to me it looks like successive Governments have signed up to be responsible for everything. The current Government has taken an aggressive approach with Northern Pulp by cancelling a legal agreement with Northern Pulp to operate Boat Harbour until 2030.

The cancelling of that Agreement in 2014 reduced the length of the Lease by 10 years and 11 months.

In 2015 the Government tried to force and unrealistic Industrial Approval on Northern Pulp. Northern Pulp appealed and it went to Supreme Court. On the first day of Court the Government backed off on the issues under appeal, however this would of cost the Company many hundreds of thousands of dollars in legal fees and preparations.

The Boat Harbour Act also became Law in 2015 along with the five year deadline.

Most if not all of this was done with no consultation with the Mill. Without getting into all the details Northern Pulp has had their hands tied by several Branches of Government before the arbitrary deadline was put in place and it still continues with the Government pointing the finger at Northern Pulp that you should be ready.

My take on the cancellation of the Boat Harbour Lease to Northern Pulp Ten Years and Eleven Months early could leave the Nova Scotia Government fully responsible for all expenses and lost profit incurred by Northern Pulp.

Not to mention the complete demolition and cleanup if Northern Pulp is forced out of Business.

At one of the earlier Open House meetings Chief Andrea Paul spoke about the closure of Boat Harbour. Some of the Environmentalists in the room started pushing for the closure of Northern Pulp. Chief Andrea Paul got up and said we never asked for the Mill to be Shut Down we just want Boat Harbour cleaned up.

I have no idea how this has evolved to a point where two people, Premier Stephen McNeil and Chief Andrea Paul have the authority to Shut Down a huge portion of a very fragile economy.

The best solution for everyone would go something like this..

The only way to avoid Northern Pulp from being shut down is to grant an extension of the operation of Boat Harbour until the new effluent plant at Northern Pulp is up and running.

The Government of Nova Scotia signed off on a deal to close Boat Harbour and dictated a date of closure without consulting the Industries effected.

The Government has been in negotiations in regard to compensation for the closure of Boat Harbour so they are on the hook.

The Agreement on the closure date for Boat Harbour was made between the Government and Pictou Landing Chief Andrea Paul.

I know Pictou Landing is not a rich community and they do deserve to be compensated if the Government does not live up to the closing date of January 31/2020.

THE NOVA SCOTIA GOVERNMENT IS LIABLE

The question is, do they want to be liable for destroying several Industries with the Shut Down of Northern Pulp or pay Pictou Landing Residents what it is worth to extend the Boat Harbour closure date until the new effluent plant is complete.

Either way the Natives would see the closure of Boat Harbour.

The new effluent plant proposed by Northern Pulp will have a positive effect on the Environment as well as Employment and the socio economic situation in the Province.

In a CBC Interview with the Premier in Sydney over Christmas there was some suggestion that if Northern Pulp closed we would still have one Mill in the Province. That other Mill has already cut Producers to the bare bone as it is, just imagine if there was no competition. I expect the Forest Industry will speak for themselves on that issue.

It is time that common sense comes to the table. Northern Pulp wants to clean the Mill up to world class standards.

Sincerely,

Business Manager

UA Local 244

TERM EMPLOYEES EMPLOYED AT NORTHERN PULP NOVA SCOTIA IN 2018

LOCAL 83 CARPENTERS 3 MEMBERS	Total Hrs Worked 1,296.00	Total Hrs Paid 1,544.50	Total All Earnings 57,701.26
LOCAL 1178 MILLWIGHTS/MACHINISTS 60 MEMBERS	Total Hrs Worked 13,275.25	Total Hrs Paid 15,338.25	Total All Earnings 552,660.09
LOCAL 409 SHEET METAL WORKERS 1 MEMBER	Total Hrs Worked 187.50	Total Hrs Paid 231.25	Total All Earnings 8,505.82
LOCAL 244 PIPEFITTERS/WELDERS/INSTRUMENTATION 97 MEMBERS	Total Hrs Worked 16,309.00	Total Hrs Paid 19,147.50	Total All Earnings 686,547.22
LOCAL 625 ELECTRICIANS 12 MEMBERS	Total Hrs Worked 1,129.00	Total Hrs Paid 1,357.50	Total All Earnings 49,869.94
LOCAL 116 INSULATORS 1 MEMBER	Total Hrs Worked 184.00	Total Hrs Paid 220.00	Total All Earnings 8,092.11
LOCAL 615 LABOURERS 6 MEMBERS	Total Hrs Worked 1,860.00	Total Hrs Paid 1,976.00	Total All Earnings 46,339.08
TOTAL OVERALL 180 MEMBERS	Total Hrs Worked 34,240.75	Total Hrs Paid 39,815.00	Total All Earnings 1,409,715.52



March 6, 2019

For Immediate Release

No Plan B Possible for Forestry Sector

(Abercrombie, NS) Last week, both Premier Stephen McNeil and Progressive Conservative leader Tim Houston had an opportunity to debate the future of the forestry sector. Lacking in the conversation was discussion regarding providing Northern Pulp with a short extension to complete its new wastewater treatment facility.

"It needs to be said: without Northern Pulp there can be no plan B that does not include massive job losses," states Jean Francois Guillot, Vice President Operations East with Paper Excellence Canada, owner of Northern Pulp. "The forestry sector's future was discussed in the legislature last week, but no one discussed a short extension for our wastewater treatment facility."

"Without a short extension, we will be forced by the government to cease operating and that will cost jobs throughout rural Nova Scotia."

Northern Pulp's new wastewater treatment facility will ensure no untreated wastewater ever leaves the site and will then continue our practice of releasing treated wastewater into the Northumberland Strait. "Once this new project is completed, we will be one of the most environmentally responsible mills in Canada," said Guillot. "We too want to see Boat Harbour cleaned up, we want to finish our new treatment facility; we just need a little bit more time to get that done."

"Our partnerships with sawmills, forestry contractors and private woodlot owners are critical to its success and the rural economy," said Guillot. "Our new wastewater facility will reduce our environmental impact while ensuring we can continue to help the Nova Scotian economy."

"Any plan for the future of the forestry sector that does not include Northern Pulp will be a plan for the managed decline of the sector in Nova Scotia."

- 30 -

Quick Link:

Northern Pulp's wastewater treatment project was officially registered on February 7, 2019 with Nova Scotia Department of Environment. The project document is publicly available via https://novascotia.ca/nse/ea/Replacement_Effluent_Treatment_Facility_Project

Media Contact:

Kathy Cloutier

Communications Director, Paper Excellence Canada

media@northernpulp.com

From:
To: [Environment Assessment Web Account](#)
Cc:
Subject: Letter to N.S. Environmental Assessment Branch Re.: Northern Pulp Effluent Treatment Facility Project
Date: March 6, 2019 2:50:12 PM
Attachments: [image001.png](#)
[Northern Pulp Environmental Assessment 20180306.pdf](#)

Please see the attached letter from Unifor Atlantic Regional Director, regarding the Northern Pulp Effluent Treatment Facility Project.
Full text of letter also found below.

Secretary/Secrétaire



63 Otter Lake Court, Halifax, NS, B3S 1M1

March 6, 2019

Environmental Assessment Branch
Nova Scotia Government, Environment Department
Halifax, NS

Re: Northern Pulp Replacement Effluent Treatment Facility Project

Greetings,

Unifor proudly represents 240 workers at Northern Pulp, 12,000 workers in Nova Scotia, and 23,000 forestry workers across Canada. We are Canada's largest union in the private sector with 315,000 members in every sector of the economy, and regularly advocate for good jobs, sustainable development, and progressive change for a better future.

Northern Pulp has proposed a world-class multi-million dollar investment to fully meet new, more stringent, environmental standards. Nova Scotia, along with the rest of Canada, has among the highest global standards for environmental stewardship in the forestry sector. With this proposed investment, Northern Pulp will be on the leading edge of environmental responsibility and stewardship in the industry. We are writing today to encourage a rapid conditional environmental assessment approval for this project.

Northern Pulp's proposed new effluent treatment facility incorporates the AnoxKaldnes BAS biological treatment process purchased from Veolia Water Technologies, one of the world's leading firms in this field. With more than €2 billion in annual revenue and 130 business units around the world, Veolia Water Technologies operates with over 9,000 employees; more than 60% of whom are researchers, engineers and project managers. Moreover, the Water Technologies division is part of the much larger France-based Veolia Group, with €25 billion in annual revenue and 169,000 employees around the world.

We are confident that with appropriate government oversight, a partnership between two global industry leaders, Paper Excellence (Northern Pulp's parent company), and Veolia, is fully capable of rigorously implementing proven technology that will meet all required environmental standards for this project. These two successful global leaders in their fields rely on fully addressing their environmental responsibilities.

Beyond the essential matter of this project meeting the technical requirements for effluent treatment, we would also like to draw your attention to the broader implications of this decision-making process. The Nova Scotia *Environment Act* is recognized as an essential piece of legislation designed to protect our shared environment, and guide our economic development. The *Act* rightly spells out its purpose through a set of principles for sustainable development that should guide its application, including:

The linkage between economic and environmental issues, recognizing that long-term economic prosperity depends upon sound environmental management and that effective environmental protection depends on a strong economy.

It is on this principle that we would like to bring forward a fuller understanding of the vital economic role played by Northern Pulp in the community, and the wider Nova Scotia economy.

A failure to provide approval for this project puts at serious risk the very future of the mill, with far-reaching implications for the entire inter-connected Nova Scotia forestry sector. Beyond the direct operations of the mill, the wider economic impact of Northern Pulp is best understood through the role it plays in sustaining the province's 93 sawmills (responsible for 2,000 direct jobs), and the broader woodland operations held by the more than 30,000 forest landowners (responsible for a further 1,300 direct jobs).

Simply put, each element of Nova Scotia's forestry sector relies on the others. The province's woodland operations supply logs to sawmills for processing into lumber and other wood products, with the leftover woodchips then sent to Northern Pulp as raw material. The top eleven sawmills in Nova Scotia, which account for 96% of the lumber produced here, all have ties to Northern Pulp – more than 90% of sawmill woodchips in the province end up there.

Beyond providing logs to the sawmills, the province's woodland operations also rely on Northern Pulp as a result of their use of selective

harvesting. This best-practice approach involves selectively removing smaller trees to allow others to grow, creating a healthier forest and minimizing the overall environmental impact. These pruned trees are sent to Northern Pulp, which takes 35%-40% of the pulpwood from the provincial market.

Without Northern Pulp as the end market for sawmills and woodland operations, the entire inter-connected forestry sector is at risk. Like many businesses, sawmill and woodland margins are slim, and the removal of a key source of revenue can easily push the operation over the tipping point, resulting in a failure of the whole business. Given the geography of the industry, it is simply uneconomic to transport these unprocessed heavy commodities long distances to pulp mills in other provinces, or the United States.

It is no surprise that an independent economic assessment of Northern Pulp conducted in 2015 found far-reaching impacts. The key findings of that study showed the operations responsible for:

- 339 direct jobs
- 5 spin-off jobs for each direct job
- 2,043 combined direct and spin-off jobs
- Over \$100 million in labour income
- \$315 million in annual spending and investment
- 1,300 companies in the supply chain affected
- 1 in 12 jobs in Pictou County

It is essential to keep in mind that these are good-paying jobs at risk, the kind of jobs which remain scarce in many rural and smaller communities. A recent analysis by the Forest Products Association of Canada highlighted the vulnerable nature of many forest-dependent communities, finding more than 600 communities across Canada, including several in Nova Scotia, where more than half of all household income comes from forestry jobs. The loss of good jobs in these dependent communities is even more devastating than in larger communities with more diverse local economies.

Nova Scotia's forestry sector is an essential ingredient in our economy, delivering a \$2.1 billion annual economic impact, 11,500 direct and indirect jobs, is the second-largest source of employment among good-producing sectors, and the province's third-largest goods exporter. Around the world, forestry is increasingly recognized as a renewable green industry with the potential for a strong future as part of a sustainable economy.

The *Environment Act* clearly articulates the link between sustainable development and long-term economic prosperity. We believe that it is not only possible to make decisions that deliver both strong environmental standards, and good jobs, but that it is our responsibility.

Sincerely,

Atlantic Director, Unifor

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JERRY DIAS
National President
Président national

RENAUD GAGNÉ
Quebec Director
Directeur québécois

ROBERT J. ORR
National Secretary-Treasurer
Secrétaire-trésorier national

March 6, 2019

Environmental Assessment Branch
Nova Scotia Government, Environment Department
[Submitted online at: <https://www.novascotia.ca/nse/ea>]
P.O. Box 442
Halifax, NS, B3J 2P8

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