

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](mailto: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,

A handwritten signature in black ink, appearing to read "John Davis". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Davis, Director  
Clean Ocean Action Committee