

Gulf Nova Scotia Fleet Planning Board
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Pictou Landing First Nation
6533 Pictou Landing Road
Site 6 Box 55, RR#2
NS, B0K 1X0

Maritime Fishermen's Union
408 rue Main St.
Shediac, NB, Canada, E4P 2G1

PEI Fishermen's Association
420 University Avenue, Suite 102
Charlottetown, PE C1A 7Z5

Honourable Iain Rankin, Minister of Environment
Department of Environment
Barrington Tower
1894 Barrington St., Suite 1800
PO Box 442
Halifax, NS B3J 2P8

Minister.Environment@novascotia.ca

June 4, 2018

Dear Minister Rankin:

We are writing regarding the Northern Pulp Nova Scotia Ltd's Abercrombie pulp mill. At present, we are gathering information about the current operations of this mill so that we can be best prepared to participate in the Environmental Assessment process once it is underway. In light of this, we are requesting certain information from your Department, as detailed below.

1. Has NSDOE established terms of reference or a scope document for the EA process relating to Northern Pulp's new effluent treatment facility. If so, please provide us with a copy. If not, and draft terms of reference exist, please provide that. If there has been any discussion between Northern Pulp and NSDOE relating to terms of reference for the EA, please provide copies of this communication. If terms of reference or a scope document do not exist, when will one be available? Can the fishermen, Pictou Landing First Nation and the public participate in development of final terms of reference.
2. Have dates for a second round of Open House information sessions prior to registration of the project by Northern Pulp been set? If so when will these sessions be taking place.

3. We request copies of all reports provided by Northern Pulp and any consultants or party providing information to Northern Pulp relating to the proposed new effluent treatment facility to NSDOE, NSTIR or any other government departments.
4. We request copies of all reports done by any provincial government department relating to Northern Pulp's proposed new effluent treatment facility.
5. We request copies of all communication between NSDOE, NSTIR or any other government department and Northern Pulp relating to Northern Pulp's proposed new effluent treatment facility.
6. We request copies of any notes taken by any government employee or elected official from any meeting or communication with Northern Pulp personnel or board members during which a new effluent treatment facility was discussed, including possible options for such a facility. We also request copies of any distributed materials and minutes from any such meetings.
7. We request copies of any communication with, and reports or opinions from, scientists or experts of any type who have been consulted to date by any government department in relation to Northern Pulp's proposed treatment facility.
8. With respect to the Effluent Monitoring Parameters and Discharge Limits within Northern Pulp's 2015 Industrial Approval, we request the actual effluent quality results for all parameters listed in Table 6 from 2015 to the present for points A, C, and D.
9. We request clarification as to whether treated effluent is or is not diluted by any amount of freshwater between the final stage of the current effluent treatment system and the point where effluent is sampled for testing.
10. We request all water usage records from 2011 to present.
11. We request all wastewater discharge quantity records from 2011 to the present.
12. We request copies of all inspection reports for Northern Pulp, both the mill and effluent treatment facility, from the period starting 2011 to present, including both routine inspection reports and any incident reports.
13. We request a list of environmental incidents occurring at the Northern Pulp mill, including any incidents where an effluent discharge limit has been exceeded, where an LC50 test has failed, or where a spill into the environment has occurred from 2011 to the present.
14. Please provide all LC50 test results with documentation from 2011 to present, as well as all other acute or long-term toxicity tests conducted in that period.
15. Sediment contamination and testing:
 - a. What sedimentation testing is presently required? For what parameters? How often? At what location?
 - b. Also with respect to sediment testing, we request all information including test results, core sampling and analysis regarding levels of contaminants in

sediments at increasing distances from the current effluent outlet to Northumberland Strait at Boat Harbour.

- i. More specifically, we request information on the levels of metal contaminants, PAHs and other contaminants as listed in Canadian and Nova Scotian contaminated site regulations. At a minimum, we request information on the following contaminants: Petroleum hydrocarbons, AOX, Trivalent chromium, Hexavalent chromium, Copper, Iron, Nickel, Vanadium, and Zinc.
 - ii. Also, we request all sediment and core samples from 2011 to the present for Pictou Harbour and the area impacted by discharge of effluent at Point D.
 - c. With respect to the expected Environmental Assessment, what sediment quality testing will be undertaken? What will the government determine that current reference locations for sediment testing are not already contaminated, thereby making them irrelevant for meaningful sediment quality testing.
 - d. Also, we request all sedimentation tests and core sampling carried out in relation to upstream industrial facilities over the past 20 years.
16. Has testing been required for groundwater in the vicinity of the mill site. If yes, for what parameters. If yes, please provide all test results for all parameters for the period beginning 2011 to the present.
17. Please provide any documentation relating to identified issues or risks with the present surface water discharge including storm water flows which could result in contaminants entering Strait waters.
18. Is there an industrial approval clause or a grandfathered agreement or permission of any type that allows Northern Pulp to release untreated sewage into the existing effluent treatment facility? If so, please provide.
19. Please provide information in relation to landfill on mill site.
- e. What, in general terms, is the engineering design of this landfill?
 - f. Was the landfill built to a certain standard and approved by an engineer? If so, please provide details including date of approval.
 - g. Is testing for contamination from leachate from the landfill on the mill site presently required? If so, we request these test results for the period starting 2011 to the present.
 - h. How is the leachate from this landfill collected and treated?
 - i. Does leachate from this landfill ever reach the ocean?
 - j. Is groundwater around the landfill monitored? If so, we request copies of these monitoring reports.

We thank you in advance for your assistance in helping us get up-to-speed with the above information. As you know, the quality of Environmental Assessments depends on well-informed participants. Please don't hesitate to contact us with any questions of clarification regarding our questions above.

Sincerely,



Ronnie Heighton
Gulf Nova Scotia Fleet Planning Board, President



Andrea Paul
Pictou Landing First Nation, Chief



Robert H. Jenkins
Prince Edward Island Fishermen's Association, President



Carl Allen
Maritime Fishermen's Union, President