

March 9, 2019

Dear Honourable Minister Miller:

I am writing in response to Northern Pulp's environmental assessment for their new effluent treatment facility that would discharge upwards of 85 million litres of treated pulp effluent daily into the delicate ecosystem of the Northumberland Strait.

My husband and I have a cottage on Moodie Cove, Pictou Landing. As recreational water enthusiasts, we have spent our summers exploring the Strait and observing its diverse marine life. The Caribou Harbour area is one of our favourite areas to explore. We travel from the Pictou Landing Marina, make our way around the PEI Ferry markers and anchor off Munroe's Island. Here we will walk the beaches, swim and snorkel. While snorkelling, we have noticed the Caribou area is rich in marine life and is home to large populations of juvenile fish and crustaceans.

**Concern: Northern Pulp's Community Liaison Committee - Lack of Transparency**

While there are countless data gaps and inaccuracies in Northern Pulp's Environmental Assessment related to potential harmful environmental effects of the Project, I would like to focus on one concern with respect to public consultation, specifically Northern Pulp's Community Liaison Committee.

Northern Pulp provides the following description of their Community Liaison Committee (CLC) in their EA.

*"NPNS has an existing Community Liaison Committee (CLC). The CLC serves as a formal consultation process with certain local stakeholders in compliance with NPNS' Industrial Approval to operate. The CLC serves a very important role in providing advice and facilitating two-way communication. The CLC members represent themselves as members of their community and provide their own personal perspective to the committee. They also provide constructive input on how the company may better address and respond to the community needs and concerns. The CLC meets at a minimum twice annually, in Spring and Fall, as well as convening on an as-needed basis. The CLC includes representatives from Pictou Landing First Nation, the communities of Abercrombie, Pictou Landing Moodie Cove and Pictou, NPNS staff, and NPNS executives."*

In the Socio-Economic Impact section of the NPEA, under 8.14.6 *Follow-up and Monitoring [operation and maintenance phase]*, Northern Pulp states: *The existing Community Liaison Committee will continue to serve the very important role in providing advice and facilitating two-way communication between the local community and NPNS.*

And also under the Socio-Economic section, under 8.15.3.3 *Characterization of Residual Environmental Effects*, the NPEA states: *The existing CLC will continue to provide two-way communication between NPNS and the surrounding communities.*

Northern Pulp's CLC meeting minutes (sample: <http://northernpulp.ca/assets/Uploads/NPNS-CLC-June-2018-summary-notes-FW.pdf>) indicate there is a representative from Moodie Cove on the CLC, however no name is provided for that committee member nor any of the other committee members.

As mentioned above, our cottage is on Moodie Cove, along with 20 other cottages that are accessed by three private roads. There are no permanent residents on Moodie Cove. Twelve of the cottages, including ours, is accessed via Rustico Lane. I contacted an executive member of the association for our road, [REDACTED] to ask if he knew who the representative was for Moodie Cove on Northern Pulp's CLC. [REDACTED] was unaware there was a representative and called Northern Pulp on behalf of our association to find an answer.

[REDACTED] received a call back from Terry Fraser, Northern Pulp's Technical Manager. Ms. Fraser indicated that the CLC members are anonymous and that if we wanted to present any of our views or questions to the committee, it would have to be through her.

In Nova Scotia Environment's *Guide for the Formation and Operation of a Community Liaison Committee* ([https://novascotia.ca/nse/issues/docs/Community\\_Liaison\\_Committee\\_Guideline.pdf](https://novascotia.ca/nse/issues/docs/Community_Liaison_Committee_Guideline.pdf)), it states the purpose of a CLC is: *To represent community interest by providing an avenue for the mutual exchange of information between the proponent and the community with respect to any existing or potential environmental effects of the project plan and activities.*

The Guide also details the following mandate and responsibilities by the proponent and CLC members:

Section	Description	Issue/Concern
<b>The mandate</b>	<i>A forum whereby the residents can bring any issues of public concern related to proponent's activities to the attention of the facility operators.</i>	The only residents who can bring their issues forward, are the ones sitting on the CLC, therefore Northern Pulp's CLC fails to represent the concerns of their communities.
<b>Proponents Responsibility</b>	<i><u>Notice of the CLC formation and members must be made known to the residents of the affected area by the proponent.</u></i>	Northern Pulp's members have remained confidential making it impossible for residents to bring their concerns forward to the CLC.
<b>Proponents Responsibility</b>	<i>The proponent should ensure that the views of the CLC are made available to the public in an appropriate manner.</i>	Minutes from CLC meetings made available to the public are vague and provide no detail on input from CLC members (sample: <a href="http://northernpulp.ca/assets/Uploads/NPNS-CLC-June-2018-summary-notes-FW.pdf">http://northernpulp.ca/assets/Uploads/NPNS-CLC-June-2018-summary-notes-FW.pdf</a> )
<b>CLC Members' Responsibility</b>	<i>Discussing community views, issues and concerns with respect to the project plan and activities.</i>	It is impossible for CLC members to adequately express the views of the community when the community is unaware of who to express their views to.

In summary, Northern Pulp's Community Liaison Committee fails to facilitate any genuine or meaningful two-way communication between the local community and Northern Pulp. The CLC also fails to effectively represent the concerns and opinions of the surrounding community. It is my understanding that Northern Pulp's CLC structure has been brought to the attention of Nova Scotia Environment in the past, and that NSE has accepted this poor level of functioning.

Not only did Northern Pulp fail to hold a second set of public consultation sessions to inform the community on changes to their proposed ETF and the new Caribou outfall location, but they are now suggesting their CLC committee will be a primary tool in mitigating environmental effects from the construction and operation of this new facility to the socio-economic environment. (section 8.14 - Socio-economics Environment, 8.14.4.2 - Mitigation).

As the Minister of Environment, you are obligated to '*consider steps taken by the proponent to address environmental concerns expressed by the public*' when making your decision. Northern Pulp has not done an adequate job informing the public and collecting concerns, and therefore cannot properly address them. As well, Northern Pulp does not have the proper infrastructure in place to address any public concerns during the construction and operation phases of the project.

Based on the above outlined concerns, combined with the extensive data gaps in the NPEA, I am requesting that you reject Northern Pulp's proposal. Northern Pulp has failed to demonstrate that their project will not cause adverse effects to the environment that can be mitigated.

Sincerely,

Linda Townsend  
Upper Rawdon NS  
(summer resident - Moodie Cove, Pictou Landing)