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Dear Margaret Miller and Nova Scotia Environment team

We are writing in relation to Northern Pulp's Replacement Effluent Treatment Facility Project. We own two businesses in the Province of Nova Scotia. A commercial fishing business located out of Caribou, NS and a small trucking company located out of the Town of Pictou. We are parents and property owners and most importantly tax payers of Nova Scotia.

After weeks of reading the environmental assessment submitted by Northern Pulp, I have many concerns; however, I do know there are hundreds of people including chemists, biologist, doctors, engineers, scientists and other knowledgeable folks that are writing in with their concerns regarding same. On that note, the following document submitted by us will include a bit of our personal issues and of course leaving out lots to the professionals that have already submitted.

The EA starts off with the Executive Summary providing a table indicating the "significance of project-related residual environmental effects on 18 items. And for some miraculous reason every single one of them is assessed at "NS" or No Significant Residual Environmental Effect Predicted". Well I can predict that I will win the lottery next year but the chances of that are slim to none. So, lets cut the bullshit!!! So as Joan Baxter states in her article in the Halifax Examiner on March 5th, 2019 *Northern Pulp's environmental documents: In other words, the on-site Activated Sludge Treatment system will effectively treat millions of litres of toxic pulp effluent a day, every day, without a hitch. The 36-inch diameter pipeline that will run 11.4 km across the causeway and then overland beside Highway 106 to Caribou Harbour will never leak or spill its contents in the Pictou watershed, or negatively affect the scenic landing point for the PEI ferry that brings tens of thousands of visitors to Nova Scotia each year. The 4.1-kilometert pipe into the Northumberland Strait that will dump millions of litres of effluent a day into the rich fishing grounds will not harm fish habitat or the ecosystem. The "dewatering process" of the sludge from the treatment facility will work well, and there is no need to worry about burning it in the mill's power boiler, even though that boiler has already caused many emissions problems.*

Within this document we will give our reasons why this project will cause adverse effects or significant environmental and health effects, negative economic effects and mitigation or lack there of, of same.

Some of our concerns with Northern Pulp's environmental assessment:

In this section we will refer to some of the concerns, discrepancies and wrong information that has been submitted by Northern Pulp.

Human Health

I live approximately 3 km from the stacks at Northern Pulp. We suffer with our breathing here. Especially on humid days. The smog sits on top of our Town and penetrates into our homes and our lungs. We cannot open our windows. I had to cut 22 trees out of my yard so that the heavy smog would have a chance to flow through as opposed to sit stagnant. I know that none of you reading this right now know exactly what that means. Maybe in the next 20 days you should take a drive down to Pictou or Pictou Landing and take a nice long inhale. You should come in the middle of the night to see 23 stacks blowing smoke while people are sleeping and then only 11 in the day. This is a regular occurrence as I work night shifts and have the pleasure of witnessing this questionable activity.

Section-9-15 Human Health Evaluation: the consultants compared the “potential human exposures and risks associated with a marine treated effluent discharge” from a Kraft pulp mill in Bell Bay Tasmania. However, it would be impossible to compare the two because **IT DOES NOT EXIST!!!! Remember this is the section where they assessed the possible impacts of human health! And remember that they determined that by comparing the two that there would be no significant health impacts!! From a mill that DOES NOT EXIST!!!!**

This is all I should have to write, but I will continue.....

Mercury:

Oh wait! Northern Pulp didn't mention all the mercury that they have buried on their property! In fact, they didn't mention any of the mercury. Nova Scotia Department of Environment know about the Mercury, Northern Pulp knows about the mercury and Dillon Consultants know about the mercury; yet no mention of it in the environmental assessment!

Mercury is an environmental toxin which is persistent and bio-accumulates. It does not “go away” it can build up in the environment and in the food chain. There is no known safe level of human exposure to mercury.

Northern Pulp consultants told me at the open house that there is no mercury in their effluent. When I read the reports from the raw effluent spill from 2014 there were substantial amounts of mercury found. So why did they lie to me? Maybe they didn't think people would get their hands on those reports?

It is my opinion that given the fact that Northern Pulp has neglected to include this extremely crucial portion of concern, that the Minister of Environment should request a full impact study on this material alone. And demand proof that there is no mercury on site at Abercrombie Point as Northern Pulp is claiming

Section 8.3 Soils and Geology in relation to scallop fishing

The assessment talks about the type of bedrock along the land portion of the pipe but fails to mention any of the bedrock along the marine portion. What we do know about the bedrock along the marine portion and the outflow portion is that it is constantly

changing. Chad fishes scallops along some of this area. From year to year as he drags the ocean floor and the materials come up in his baskets onto the boat, he gets a first hand look at what is on the ocean floor. From his 23 years of experience not one year is the same as the next in the exact same location. For example (North South 14,316 and East West 29,820) in 2017 had huge boulders and huge rocks (granite, coal, shale, sandstone are some examples). So big in fact, that the weight broke Chad's cable. But in that exact same location in 2016 the ocean floor had mud and only mud. This is the same with all areas that Chad fishes every year for the last 23 years.

There is no mention of coal. There is a substantial amount of coal on the ocean floor sub surface as well as surface all along the pipe location and outflow location. A conversation I had with Dan Parker, a geologist from Nova Scotia said "disturbing coal deposits releases methane. Methane in either air or water isn't good. The submission is missing this information! Information that is a necessity to evaluate the impacts of the project.

I believe more information on coal deposits and the effects of disturbance and the geological report for the marine portion of the project is needed before the Minister can make a decision.

Table 8.6-2

Seasonal Sensitivity of "freshwater" fish species potentially occurring in Local Assessment Area

The chart shows zero sightings for all species including white sucker, mummichog, minnows, perch, rainbow trout, gasper au, Atlantic salmon, brook trout, and brown bullhead. Chad sees minnows, mummichogs, rainbow trout when he is smelt fishing. They are known to inhabit brackish waters and Chad fishes smelts adjacent to where this sight test was conducted. Gaspereau frequently come up in his traps and are a feeding fish for lobster. It is very well known that Atlantic Salmon are certainly plentiful in the area.

Just because someone put a net out for a day and didn't catch any of the species on the list, does not mean they don't inhabit the area!!

Fishing and Recreational use of the Outflow Area:

THERE IS 100% COMMERCIAL FISHING AND RECREATION ON, NEAR, AROUND THE LOCATION EXTENDING THROUGH THE WHOLE GULF REGION!

We hold licenses for 7 species in the exact location and beyond the pipe and outflow location. They include smelts, herring, swordfish, scallops, mackerel, squid and lobster. We recreationally fish bar clams, bass and mussels from the exact locations as well. Our freezer is full of bass, clams, lobster, scallops. If this pipe goes out and pumps and unidentified liquid at a relentless amount of 85 million liters per day,

every day, all of this will be ruined. I cannot consume, nor give my child and other family member, friends and stranger, food that has ingested or absorbed an unidentified effluent!!!! Think about it. Or better yet, I will go over to the lagoon at Boat Harbour and grab a big pot full of effluent and cook you all up a big feed of lobsters, then you can make a decision on if this should go out into the Strait!

Recreation on this body of water and the surrounding beaches is huge! Boaters, swimmers, kayakers, beach combers, cottagers and a Provincial Park.

PERSONAL ECONONICS

Chad was 22 years old when he bought his commercial fishing gear and licenses. He is a third-generation fisher and fishing is in his blood. This isn't a cliché statement, this is the reality in a fishing community in NS. We have invested 1.6 million dollars over the years into this business and this is our retirement. If this project is approved and a pipe goes out into the Northumberland Strait, we will lose our stewardship. We are done! Everything we have worked for will be gone. Please consider our plea. We hire local people, we invest in the local economy. We pay substantial amount of taxes each and every year.

End Summary

I am keeping my submission short because I know of all the professionals that are taking on each and every piece of this assessment will have a thorough and fact-based submission so I will leave the scientific and technical stuff to the professionals.

We feel that Northern Pulp's submission does not prove a lack of significant risk, and is missing critical data on many issues. There is insufficient evidence to know exactly how broad any damage might be. The company's claim that damage will be "minimal" is not credible because they have no data to back up claim....just words. Fisheries, tourism and outdoor recreation are very important economic factors that should absolutely not be put at risk. As far as consultation goes: The United Nations Declaration on the Rights of Indigenous Peoples requires not just consultation, but consent by the local Indigenous population. Pictou Landing First Nation is opposed to this proposal. The company promised community consultation and we did not receive that after the first proposal was squashed by the company. The must reject Northern Pulp's proposal and close the effluent treatment, Boat Harbour on schedule.

Please reject this proposal by Northern Pulp! We cannot mitigate the Northumberland Strait. We cannot ruin an entire fishing industry. We cannot ruin our environment. We cannot put people's health at risk!!

Krista Fulton and Chad Smith

