



Cape Breton Fish Harvesters Association

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April 20, 2018

The Honourable Dominic LeBlanc
Minister of Fisheries and Oceans
House of Commons
Ottawa, Ontario, K1A 0A6

Dear Minister LeBlanc,

As you are most likely aware Northern Pulp, a bleached kraft paper mill located in Pictou Nova Scotia, is proposing a new treatment facility that will discharge 70-90 million litres of contaminated effluent into the Northumberland Strait every day. A Federal government study recently concluded that, even when meeting federal regulations, 70% of pulp mills in Canada continue to have harmful effects on aquatic life and habitat, and 55% are having harmful effects on the larger environment. The Northumberland Strait is part of the rich and vital fishing industry of our province. The reputation of our industry, and our brand, is built on seafood harvested from clean, cold, pristine waters off our province's rugged coastline. A threat to this reputation is a threat to the industry throughout Nova Scotia, Cape Breton and in neighbouring provinces.

From December to March, a group representing over 3000 fishermen from Nova Scotia, PEI and New Brunswick, along with Pictou Landing First Nation, met with Northern Pulp in the hope of finding a solution that was mutually beneficial to both industries. Unfortunately, Northern Pulp has failed to assure them that our brand and our livelihoods are not at risk. In fact, all evidence points to the proposed pipe and its discharging effluent having harmful effects on marine species. Mill officials and their consultants provided no hard science on the impact on fisheries and fish habitat, yet insist that discharge into the Northumberland Strait is their only option. Northern Pulp appears satisfied to have the fishing industry assume 100% of the risk of their proposed new treatment facility. There is an indemnity agreement in place between the government and the mill that holds Northern Pulp harmless for any damage caused to the environment or to other industries, leaving all risk on the fisherman and taxpayers of Nova Scotia.

The working group has submitted an application to the Federal government for an environmental assessment under Section 14 of the Canadian Environmental Assessment Act, 2012. This would be a more rigorous, science-based evaluation than the process adopted by the provincial government (a fast-tracked Class One Provincial Environmental Assessment with a short 30-day window for public input).

We support the group's request that permission be denied for an effluent pipe in the Northumberland Strait or, at the very least, request that a FULL federal environmental assessment be conducted for this project. The fishing industry is constantly challenged by DFO to use the precautionary approach in its exploitation of resources and we ask that the same approach be used in permitting developments that affect our resources.

Thank you for your attention to this very serious matter,



David Ferguson, President
Cape Breton Fish Harvesters Association

- cc. The Honourable Catherine MacKenna
 The Honourable Rodger Cuzner
 The Honourable Mark Eyking
 Alfie MacLeod, MLA Sydney River-Mira-Louisbourg
 Derek Mombourquette, MLA Sydney-Whitney Pier
 Eddie Orrell, MLA Northside Westmout
 Geoff MacLellan, MLA Glace Bay
 Keith Bain, MLA Victoria the Lakes
 Tammy Martin, MLA CB Centre
 Ronald Heighton, Northumberland Fishermen's Association