

Date: November 3, 2019 at 2:55:10 PM AST
From: MARY <mjgorman@ns.sympatico.ca>

Date: November 3, 2019 at 2:38:38 PM AST
To: EA@novascotia.ca
Subject: response to Northern Pulp focus report
re: pipe into Northumberland Strait



November 3, 2019

The Hon. Gordon Wilson
NS Minister of Environment
1894 Barrington St

Suite 1800 Box 442
Halifax NS B3J 2P8

Dear Mr. Minister,

Save our Seas and Shores is a coalition of fishers, First Nations and concerned activists from NS, NB, PEI, QC and NL who have advocated for protection of the Gulf of St Lawrence for decades. The Gulf of St Lawrence provides global food sources and feeds the coastal communities of 5 provinces and thousands of jobs with its multi billion dollar sustainable fishery and tourism industries.

We are writing today to comment on Northern Pulp's Focus report which details its ill advised, unrealistic scheme to pump 92 million litres of toxic kraft bleached effluent into this exceptionally fragile body of water. This egregious proposal lacks integrity, responsibility and a concrete grip on reality. Our coalition vehemently opposes a pipe dumping toxic pulp mill effluent adjacent to Caribou Harbour or anywhere in the Northumberland Strait and Gulf of St Lawrence. Let us explain why.

1) Six and a half times smaller than the Gulf of Mexico, the Gulf of St. Lawrence is a fragile, landlocked, semi-enclosed inland sea that completely exchanges its water with the Atlantic Ocean only once a year. As one of the most productive marine regions in Canada and one of the most precious ecosystems on earth, (according to Dr, David Suzuki), it should never be placed in harm's way. Because of its circular, counter clockwise currents, any contamination will be widespread along the Gulf coastlines of Nova Scotia, New Brunswick, Prince Edward Island, Quebec and Newfoundland. This is further exacerbated by winter ice coverage that eliminates wave action that could contribute to oxygenation of the water. This freshwater effluent will raise to the surface and lay under the ice for months at a time every winter.

For 50 years, Northern Pulp has dumped 92 million litres of kraft bleached effluent, known to be one of the most toxic marine pollutants

on this earth, every single day into this fragile ecosystem where over 2,000 marine species spawn, nurse and migrate annually. Their irrational logic for the continuation of this immoral conduct is that they've done it for fifty years and no harm has been done... so they say.

In reality, as it stands now, the Right whale, Blue whale, leatherback turtle, piping plover and harlequin duck are endangered; while Atlantic salmon, cod, fin whale, humpback whale are in trouble; bass are in sharp decline, as are mackerel and herring; Bluefin tuna are starving and flocking to fishing boats for food – these are just some examples of the disgraceful indicator that in only fifty years, our generation has taken for granted and degraded our Gulf's natural, renewable resources. We have allowed unfettered industrial development and pollution with little regard for the precautionary principle and ecosystem approaches demanded by the United Nations Convention on Biodiversity, supported by Canada in 1992.

In October of 2018, international scientists noted that the Gulf of St Lawrence is one of the most deoxygenating bodies of water on this earth.

<https://e360.yale.edu/digest/the-gulf-of-st-lawrence-is-losing-oxygen-faster-than-almost-any-other-marine-environment>

The authors of this study also note that protection of the Gulf needs to happen via governments at regional and local levels.

How does NSDOE reconcile this international science with Northern Pulp's irrational logic that a half a century of toxic effluent dumped into spawning waters determines that they should continue to violate our oceans? Northern Pulp's focus report reads as if they are dumping into pristine waters, rather than the deeply degraded fragile ecosystem the Northumberland Strait and Gulf of St Lawrence have now become in 2019.

There is no mention in Northern Pulp's focus report of the current state of de-oxygenation in this body of water. Hence the entire focus

report is a farce, not grounded in truth or reality.

2) Northern Pulp plans to build its treatment facility on top of mercury that was buried by previous owners. Any individual is aware that disturbing buried mercury could lead to irrevocable consequences. The enclosed article by investigative journalist Joan Baxter explains this mercury problem in great detail. Yet it is being all but ignored by the NS Dept of Environment. It is disgraceful conduct for a department mandated to protect Nova Scotia's renewable resources to simply ignore and pretend that this monster of a mercury problem does not exist. Our children deserve better scrutiny and oversight of proposed industrial developments in 2019 when their very future is in peril.

<https://www.halifaxexaminer.ca/province-house/nova-scotia-has-a-mercury-problem/>

3) Perhaps NSDOE is ignoring this frightening mercury problem because of the conflict of interest you are in, as both owner, operator of the Boat Harbour treatment facility and alleged environmental protector of Nova Scotia's resources. For this reason, our coalition does not have any faith or believe your department can ethically determine this environmental assessment. We believe there should be a full federal assessment under CEEA.

Whatever your reasons for ignoring this looming mercury crisis, and the current de-oxygenation of our precious Gulf and its ongoing decline of marine resources, Save our Seas and Shores reiterates that we are vehemently opposed to any further effluent being dumped by this antiquated mill into the Northumberland Strait.

We are grateful to the Nova Scotia government for its leadership in establishing the Boat Harbour Act. But you must finish what you have started. Re-routing the toxic effluent from Boat Harbour to Caribou Harbour is MOVING the problem. Not solving it.

It is our responsibility as adults to protect the ecosystems that enable resource development for future generations. Up until now, we have failed our children. This must stop. Now. There must be #NOPIPE in the Northumberland Strait.

Respectfully submitted,

Mary Gorman and Percy Hayne

<https://www.saveourseasandshores.ca>

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<https://e360.yale.edu/dest/the-gulf-of-st-lawrence-is-losing-oxygen-faster-than-almost-any-other-marine-environment>