

Barbara Louder

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I am writing in response to the Northern Pulp Focus Report on the Proposed Effluent Treatment Facility Project. I am a resident on Dartmouth, NS, and have spent a lot of time in the Pictou, Caribou and Pictou Island area over the past 20 years. Close family friends are residents of Caribou, and I frequently spend time with them there. In addition, I am a visual artist and art professor, and have carried out artistic research and artmaking in Caribou and on Pictou Island.

I wish to respond to the following sections of the Focus Report:

Overland effluent pipeline corridor: system monitoring and control (2.7.1.2.2) and leak detection (2.7.1.3) in the Report prepared by Wood Canada Ltd for Northern Pulp), Appendix 2.1 in particular.

In regard to system monitoring and control, detailed information regarding a proposed alarm system that would be initiated when abnormal pressure and temperature conditions are detected has not been provided. It is not clear how conditions of concern (pressure and/or thermal changes, in addition to pipe failures) would be detected, how any such detection would then initiate an alarm, and what system of response to these conditions would then be implemented. Given the length of the proposed pipeline, the proposed route over watershed, wetland and other areas with sensitive habitats, this information should have been provided in great depth and detail.

Specifications regarding the Leak Detection system and technology to be used in leak detection have not been provided within section 2.7 of the report. Wood Canada states that "Final technology selection for the leak detection system will be completed during the detailed design" (page 11). This process of detailed design would presumably be done at a point in time when public and stakeholder consultations and government approvals were concluded, providing for no transparency or scrutiny of the design. This is unsatisfactory for a proposed project with such impact.

The proposed pipeline would be over 8km in length and be placed in watershed, wetland and forest lands between Abercrombie and Caribou. Pipeline failures (leaks, ruptures) would have serious and negative effects on the flora and fauna in these zones.

Northern Pulp's existing (and much shorter) pipe has failed on a number of occasions, with leaks occurring on (leased) private lands. The corporation's past practices in regard to leak detection, alarms, reporting and transparency have been inadequate. In light of this history of leaks, Northern Pulp has a serious responsibility to provide detailed information about the system that they propose to use for leak detection for this much longer pipeline. They have not provided this information in the report.

In conclusion, I recommend that the undertaking by Northern Pulp be rejected, because the information provided in the Focus Report on issues of pipeline condition alarms and leak technology systems is inadequate. Northern Pulp has had many years, in addition to financial and other resources and incentives, available to it in establishing a responsible and well-managed resource-based industry in the region. At this time, they have been required to provide a thorough and satisfactory Focus Report. It is my view that they have failed in providing such a Report.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. Louder", with a long, sweeping horizontal flourish extending to the right.

Barbara Louder