

Dear Minister Margaret Miller,

My name is Charlie McGeoghegan, from Belfast PEI. I am the President of the "Lobster Fishers of PEI Marketing Board", we represent All 1260 lobster fishers on PEI, we collect a levy from every pound of lobster caught on PEI to be used for Marketing and promotion of Prince Edward Island Lobster.

I am also a member of the Lobster Advisory Board For fishing zone 26A which covers the proposed toxic dump site off of Caribou Harbour.

I am a Board member of the Lobster Council Of Canada as well that Markets all of Canadian Lobster.

I am a 25 year active member of the Canadian Coast Guard Auxiliary, a commercial boat builder and I was the Liberal MLA for Belfast /Murray River for 8 years from 2007 -2015, during which time I was Government Party Whip, served on Treasury Board for over 4 years, served on the Standing Committee of Education and Innovation, Standing Committee of Agriculture, Standing Committee of Environment Energy and Forestry, Standing Committee of Fisheries, Transportation and Rural Development and the Standing Committee of Public Accounts.

I have been a licensed Captain and Commercial Lobster Fisherman on my own since 2000 and have fished on family boats since 1980 off of Point Prim For Lobster, Crab, Scallops, mackerel, and Herring which was mostly on the NS north shore between Pictou Island and Tony River. I have also represented Canada at 7 World Armwrestling Championships and Won the Gold Medal for Canada in 2003. I am still in the sport today competing at a high level and train a group of athletes every Friday evening, some of which are National Champions.

I am writing today with extreme concern over the proposed application for Northern Pulp to pump 70 - 90 000 000 liters of effluent a day into the Northumberland Strait.

There are so many aspects to this file that it could take days to explain but to put it short, Northern Pulp wants the fishing industry in NS, PEI and NB to take 100% of the risk on whether this effluent will affect lobster, lobster larvae, Herring, mackerel, rock crab and tuna stocks.

We know that the government of the day in the mid 60s along with Scott Paper told Pictou Landing First Nations that the water /effluent going into Boat Harbour would

be clean and that it would not affect fish or habitat in that estuary. Within a week, all fish were floating on the surface dead, and now 52 years later Boat Harbour is a toxic waste dump that looks like something from a science fiction movie. It is disgraceful and the PLFN and the residents of Pictou have lived with this far too long. I applaud your govt for sticking to the 2020 deadline to shut Boat Harbour down.

Boat Harbour has been catching the dioxins, furons, chloride, Chlorine Dioxide, mercury and other toxic metals for 52 years. It gives the effluent 30 days to cool while the toxic chemicals settle out. The new proposed process would see the effluent treated for hours, then solids ,chemicals ,toxins, and all be pumped directly onto Prime lobster, crab, Herring, mackeral and tuna habitat and fishing grounds.

Northern Pulp does NOT know the make up of the chemicals that will be in the effluent, they told us that. I asked in a meeting in New Glasgow, the fall of 2017 with Northern Pulp and 350 fishers, where the studies are that prove that this new proposed effluent will not harm lobster larvae ?? All their high priced lawyers and consultants at the meeting just looked at each other then admitted publicly that they did not study that at all,,,, "but don't worry, it will be fine". Can you imagine? The whole basis of our industry is larvae and they didn't even test it !!!!!

The water proposed to be dumped is fresh water and is significantly hotter than the receiving water, and we know scientifically that warm fresh water itself will kill lobster larvae, let alone the toxic soup and solids that will be pumped out with it. Salinity and temperature affect lobsters a lot. Ask SW Nova lobster buyers that hold lobsters in out door pounds what happens to lobsters if it rains hard. Also, we keep thermometers in our Lobster traps in 4 or 5 different locations throughout the season, if the temperature changes more than 2 degrees up or down it affects how they trap. I have seen them hide for days till the temperature stabilizes. The proposed effluent is over 20 degrees hotter than the receiving water. They will not stay in the area. That doesn't even factor in the chemicals and solids. The solids will be laced with chemical, fish are curious, anything with a different smell or taste they assume is food. Little would they know they would be poisoning themselves.

Then we asked Northern Pulp about ice cover and how it affects dilution and mixing ?? Again, they didn't know and did not think about that.... Or test it .

We told them at the same meeting that there was not enough water depth in Pictou Harbour to run the pipe, because the ice would crush it. They said no it will be fine. Well after 3 different survey crews at work in 2018 they all concluded that Pictou Harbour is too shallow, the pipe would get crushed by ice.

This company Paper Excellence Has 5 other pulp mills in Canada, 2 of them, Meadow Lake Saskatchewan and Chetwin BC have closed looped effluent treatment facilities that recycle their effluent. I proposed this technology as a solution for the Pictou Mill but Northern Pulp did not want to talk about it, " cost being the factor"..... Our environment is just as important as Western Canada's environment is !!!!

They said, that during the Kraft process using Chlorine dioxide for bleaching (like at the Pictou Mill now) if used in a closed loop, it will destroy (eat through) the piping system. So I said let me get this straight, your effluent will eat through metal pipes, but NOT hurt baby lobsters suspended in it ??? Nothing but silence.....

They would need to change the process to peroxide bleaching for a closed looped system so that the pipes would not be ruined. But Northern Pulp is not interested investing the required dollars to change the plant.

The NS Government finds themselves in a spider Web of conflicts of interest on this file that the public are just finding out about now.

Some of the glaring ones are, because of the 1995 indemnity agreement, the province of NS have to pay for the future cleanup of Boat Harbour, the construction of the New Treatment Facility and outfall, they are paying for the environmental report of the new treatment facility for Northern Pulp, they have to pay for any shut down time for the mill if closed before 2030 and they want to consider a class one in house provincial environmental assessment, that can be signed off by themselves.....

The Premier of NS of the day mid 1990s is now the Chair of the Board for Northern Pulp, and the lawyer that wrote the indemnity agreement in 1995 is a deputy Minister under Premier MacNeil now.

So how can we POSSIBLY get a fair, transparent, detailed environmental assessment from a fast tracked provincial class 1 ?? This project affects 3 provinces and the proposed site is in Federal jurisdiction waters. DFO, Transport Canada, and Environment Canada need to be involved to protect our Industry. The Federal Government is changing the Oceans Act and the Canada's Ocean Protection Plan, and they like to wave the environmental flag around the world. Marine Protected Areas are a big topic right now across Canada. This very location that Northern Pulp has picked for the outfall pipe, is a "Marine Refuge" officially designated by DFO, Meaning it is Prime fishing grounds and is protected, it is part of the MPA process. How could it be used as an Industrial toxic dump zone ?? Seriously?? 90 000 000

liters a day of unknown effluent with 4 tonnes of solids mixed in ??? Dumped on a Marine Refuge. !!!!

Let's talk about what we know for a fact, Stantec has been involved for years with Northern Pulp and have done air quality reports and most recently completed a 129 page receiving water study.

This report does not say what is in the effluent under the new proposed treatment facility outfall, heavy metals, solids, chemicals etc , or like I mentioned earlier, how it would affect lobster larvae, adult lobster, Herring spawn, mackerel spawn, crab larvae, or their habitat..... Or how ice cover like we have "right now" would affect mixing and dilution. There are NO reassurances and fewer guarantees.

The reason I raise this point is because Stantec was heavily involved in the environmental impact report and engineering of the Confederation Bridge. They gave it the All Clear, despite a team of scientists including David Suzuki that said there were 1200 possible environmental affects. David Suzuki said to build the bridge in the Northumberland Strait would be "monumental stupidity". And it is built directly on the biggest earth quake fault in the Northumberland Strait....

Well hind site is 20/20 and we know now who was right.

I was fishing with my father at the time, and prior to the bridge ,catches off of Point Prim 45kms east of the Bridge were 20 -30 000lbs per spring season. As soon as construction started in Oct 1993, the following spring there was a major decrease in catch, and by 1997 when the bridge was finished catches had dropped to 5000lbs of lobster for an entire season. After 4 years catches came up to 10 000 lbs, then slowly rebounded to 15000lbs but it took 18 years to get over 18000lbs and now 22 years later the catches finally came back to previous levels.

However, over 40 % of the Lobster Fishers on PEI from Wood Islands to Victoria in the spring were forced out of business due to catches being so low for so long. Also the fall season from Victoria to Egmont Bay saw similar results. NB and NS coasts 60kms on either side of the Bridge faced the same fate.

Fishers had to sell their licenses to Fishers in Beach Point east, and to West Point west, to get far enough away from the Bridge where the affects were not as drastic. The Federal govt came up with a buy back program 7 years ago as well to buy back some of the older fishers, once it realized the extent of the damage that was done.

But the money paid for the few licenses that they bought was a fraction of the value of a license today.

The Biggest noticeable change was the silt in water column, we used to be able to see the ocean floor in 20' of water. From 1994 - 2006 we could not see 3' into the water due to silt. This affected the lobster, Herring, mackerel, tuna and scallops as well. After 2006 it slowly started to clear again and now it is like before. However, we hardly would see barnacles on buoys and never on traps. Now the buoys are covered a half inch thick with them and the traps as well. We have to use paint scrapers to get them off.

Another change was the increase in tidal currents. They built the bridge directly on the narrowest part of the Strait, 44 piers, which created a venturree affect increasing the tide by 30%. Before the bridge our buoys would sit on top of the water and never pull below the surface. From 1996 on, since the Piers were placed, the currents now pull the buoys completely under water out of site. We had to add 4 fathoms of extra buoy line to our Lobster and crab gear in order to retrieve it.

The increased silt drove lobsters to the North side of PEI, we know this because the same amount that the catches in LFA 25 and LFA 26A were down, LFA 24 increased the same amount.

Another affect was the introduction of foreign invasive species like tunicates (5 different types) and green crabs. All 6 of these species were never here before and are not native to the Gulf of Saint Lawrence. We found out they arrived attached to the hull and in the bilge water of the HLV Svanen, the Dutch built, world's largest ocean Crane brought here to place the bridge sections.

The tunicates devastated the mussel industry on PEI, (Canada's largest mussel source) and drastically affected the oyster industry. Green crabs also targeted oysters and both them and tunicates are still a huge problem today costing these industries tens of millions of dollars to combat them every year.

All of these things actually happened in real time, despite "Stantec" and others stating that the fishery would not be affected and not to worry.....

The PEI government since 1996 have had a lobster index program and a Sea Sampling data base. Every year, spring and fall, provincial government Biologist come out onboard 5 times throughout the season in 60 harbours around PEI to measure every lobster that comes aboard, undersize, berried females, window females, legals

etc etc. The boats involved in the program, which I am one, record their catches and window females every day in a logbook. Now we have 23 years of lobster science on PEI, DFO (Marc Laintange) admits that PEI has the best, most accurate lobster science in the world. If you have any questions on the data or the program, call PEI Lobster Biologist Robert MacMillan 902-838-0699 or 902-314-0809 or at [RJMACMILLAN@gov.pe.ca](mailto:RJMACMILLAN@gov.pe.ca)

We are Very Very concerned about the unknowns on this proposed new treatment facility/effluent for Northern Pulp. Their track record in Pictou and around the world with their parent company Paper Excellence has a dismal reputation. It seems they will do near anything for profit. Our industry is too valuable, and you as a Minister have an obligation to make sure that things are done right. The work is not done,,,,,,and the 1700 page proposal does not answer the real questions that our industry needs answered.

Northern Pulp knew 4 years ago that the deadline was 2020. "They" decided to do nothing for 3 years, now they are pressuring you to make a rushed last minute decision.

The 1200 environmental affects of the Bridge were "risk managed" and or "mitigated" away. Some fishers in Borden PEI and Murray's Corner NB got a one time compensation check of \$10 000. Meanwhile they were forced out of business, and the fishers from Egmont Bay, Summerside, Nine Mile Creek, Point Prim, Pinette and Wood Islands got nothing. ....

The compensation package was a complete disgrace. But one thing it did do was taught us a valuable lesson that will never happen again.

If Northern Pulp and the NS Govt are so confident in the information they have now, then it won't be a problem to have a 10 billion dollar compensation plan insurance policy in place.

Like I said before, 100% of the risk is on us right now, and that is NOT an option.

The more transparent and thorough way to handle this would be for you as Minister to reject this current proposal ,and to call for a full indepth , Federal Environmental Assessment with CEAA. This will serve to protect your office and Ministry as well from 100% of the Liability if things go wrong. Noone wants their legacy to be a devastated natural resource.

In December 2017, Environment Canada officially listed "Kraft Pulp Mill Effluent" as a "Toxic Substance".....

The lobster Industry in the Maritimes was worth 2.4 Billion dollars in 2018, and has been over 2 Billion a year for many years. A big portion of this Industry is in the Northumberland Strait. We know from Giro studies that the water in the Pictou Area "Giros" (stays in the area) for 5-6 weeks and up to 12 weeks in certain conditions. Lobster larvae float in the top 3' of the water column for 6-8 weeks every summer. This concentration of toxic effluent and its affects have not been factored in.

The Marketing of " Canadian" Lobster as a whole could also be affected. Remember the "one" Mad Cow from Alberta, how it devastated the Beef Industry across Canada for a decade. The full costs are still not known today but it's in the 10s of Billions. It's only the last few years that that Industry has recovered.

Only court orders have forced this company and previous owners of the Mill to pay fines for repeated effluent spills, contamination and repeated air stack test failures.

We need your help Minister Miller ! Please reject this current Northern Pulp treatment facility /effluent discharge proposal and call for a Full, detailed, transparent and thorough Federal Environmental Assessment through CEAA, so that all of the required data can be found and tests completed.

I thank you for your time, and consideration.

Yours Truly

Charlie McGeoghegan, PEI