Northern Pulp's demands could undermine EA process, conflict with NS environmental law FONS advice to Northern Pulp: "Less public relations, more science"

"Northern Pulp's dream version of an Environmental Assessment Review could undermine the EA process and conflict with Nova Scotia law," says Jill Graham-Scanlan, President of Friends of the Northumberland Strait (FONS.)

In a letter to Environment Minister Tim Halman on March 9, 2022, FONS outlined their concerns with key elements of Northern Pulp's pressure campaign for the type of environmental assessment (EA) the company wants to see put in place.

"Northern Pulp wants a review panel made up of pulp and paper experts, as if that was the only type of knowledge needed," says Graham-Scanlan. "FONS believes an effective, science-based EA process requires a review panel with a wide range of objective expertise and perspectives. The panel must be able to fully evaluate all the potential health, environmental and socio-economic impacts of Northern Pulp's proposed project, both negative and positive."

"FONS believes that an independent review panel must be independent not only from government, but from any one industry," Graham-Scanlan adds.

FONS points out that over the past four years, independent experts from a variety of fields, as well as members of the public with detailed knowledge about local conditions, have made important contributions to understanding the potential impacts of Northern Pulp's earlier proposed project. "It was the wide range of expertise and knowledge that led to the identification of significant information gaps, and in some cases incorrect information, in Northern Pulp's earlier proposal," Graham-Scanlan states.

Graham-Scanlan is puzzled by Northern Pulp's insistence that the review panel must be appointed soon. "Until Northern Pulp does their studies, decides on a discharge point, does an analysis of their effluent and air emissions, and submits the required EA Report, there is no role for a Review Panel. Until Northern Pulp submits their EAR, there is nothing for a panel to review. That's clear in the Environment Act," Graham-Scanlan points out.

"We wonder whether Northern Pulp might be thinking they could have discussions with panel members before writing their EA Report, but the <u>EA Review Panel Regulations</u> makes clear that is not allowed," she adds.

Northern Pulp is at least a year away from submitting their EAR. They have not yet begun essential studies that will take a minimum of 48 weeks. The company has not even decided where in Pictou Harbour they hope to discharge 45 million litres of bleached kraft effluent daily.

FONS is also concerned that Northern Pulp's campaign to have the government use pulp and paper effluent regulations (PPER) as the allowable standard for NP's effluent is misleading the public about the role of federal pulp and paper effluent regulations.

"The PPER do not establish safe levels for effluent," says Graham-Scanlan. "We don't need to look any farther than Boat Harbour to see that. The effluent entering Boat Harbour from Northern Pulp's mill met PPER regulations for years. Since the shutdown of Northern Pulp, you can see the change in Boat Harbour, even before the clean-up begins. The waters are cleaner, the smell is gone, birds are coming back."

Data from Environment and Climate Change Canada (ECCC) shows that PPER do not prevent environmental harm. According to ECCC, "Environmental effects monitoring (EEM) studies required by the PPER have shown that the effluents from 70% of pulp and paper mills are impacting fish and/or fish habitat, and that the impacts at 55% of these mills pose a high risk to the environment."

"Think of it this way," Graham-Scanlan explains. "The levels permitted by the PPER remain the same regardless of whether a mill releases one litre of effluent a day or 45 million litres. They remain the same whether the effluent is going into a small lake, or the middle of the ocean. It's obvious to anyone familiar with the PPER, that they are not intended to be used exclusively to protect against potential harm to the environment or adverse effects on health."

"NP says they want standards, but the standards are clear in the law," says Graham-Scanlan. "Ultimately the panel must provide recommendations to the Minister as to whether the project can be carried out without causing adverse effects or significant environmental effects, including effects on human health, that are unacceptable and that cannot be mitigated."

If Graham-Scanlan could give Northern Pulp one piece of advice it would be short and sweet. "Less public relations, more science," she says. "If you really have a viable project, show us the science."

Final Terms of Reference (TOR) will be released by Nova Scotia Environment on Monday. FONS hopes to see TOR that require Northern Pulp to do the rigorous work necessary to show whether their proposed project can meet the standards required by law and avoid turning Pictou Harbour into another Boat Harbour and allow the people of Pictou County to continue to enjoy the clean air and water they have missed for 50 years.