

As a resident of Nova Scotia, I am opposed to enabling the further pollution of water bodies in this province by Northern Pulp. I am also opposed to the air pollution, chemical contamination and clear cutting of our forests and the immense outlay of tax dollars in support of the mill's operations. But this discussion is about the effluent treatment system so my comments will concentrate on that.

We rely heavily on the fisheries in this province as a main driver in our economy. The reputation of our quality products can be destroyed instantly with the results of contamination. This is going to reverberate throughout Nova Scotia.

The risks associated with the alteration of the Northumberland Strait both chemically and thermally are far greater than any benefits the province can realize by extending the life of this mill - already more than 25 years past its intended life span. The impact assessments of pumping up to 85 Million litres of 35 degree water into the Strait (ranging between 0 and 17.6 degrees depending on the season over the past two years) have only been done by computer modelling. The results have not been tested in real world terms, and have never been proven. No comparison can be made with any other water body, and no guarantees can be found in hypotheticals. I would add too that Northern Pulp's current industrial approval (2011-076657-A01) applies a reduction in daily water consumption to 70 Million litres by January 2020, but their plan is up to 85 Million litres going forward.

Our oceans are in dire condition, and there is no excuse for ignoring this. Ecosystems are at stake. The health of our planet is at stake. And while there has been indirect release of effluent from the Boat Harbour facility for over half a century, the evidence shows that impacts are localized to the shores around that facility. This new plan is no more than a proposal to shift the impacts to a new location, further into the Strait, impact a greater area. Moving it, does not make it better, and the absence of the 30 day settling and cooling process will only make it worse. The United Nations Group of Experts on the Scientific Aspects of Marine Pollution would classify pulp waste on their Black and Grey lists, based on the toxins contained in the effluent.

Due to multiple pipe leaks and the rupture that occurred in 2014, a condition was included in Northern Pulp's current Industrial Approval (2011-076657-A01) to install flow metres as a method for monitoring for leaks in their 4 km pipe. They failed to implement this requirement. So at this point, the intent and methodology of monitoring for leaks on an effluent pipe passing through wellfields and a watershed, as well as multiple brooks and streams over 13 kms is incredibly difficult if not impossible to support. Humans need clean, safe drinking water. Nothing else... no corporation, jobs or economic growth, matter more than human life.

4,000 pages of technical and hypothetical guessing does not contrast the daily and long term experiences of those living with the mill and the widespread impacts it has on our health, the environment and our province's finances. The first plan was supposed to be safe. The changes over the decades were supposed to make it safer. It has never been safe.

I do not support the proposed plan for Northern Pulp's Effluent Treatment Plant replacement. And I will not support an extension of the use of Boat Harbour to provide time for a new plan, or for the construction of this one.

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