

Honourable Gordon Wilson, Minister of Environment
Environmental Assessment Branch, Nova Scotia Environment
P.O. Box 442 Halifax, Nova Scotia B3J 2P8

Randall W. MacLellan & Nadine C. MacLellan TCP, Fishers

Honourable Minister Wilson,

As Our current Minister of Environment appointed to represent Nova Scotians in decision making and must determine that an Environmental Assessment Report (EAR) is required following review of the Northern Pulp Nova Scotia Focus Report for the Replacement Effluent Treatment Facility (NPNSFR) submitted October 2, 2019 in accordance with Part IV of the Environment Act by Northern Pulp Nova Scotia Corporation (NPNSC)(NPNSC, 2019) in response to the Terms of Reference For The Preparation Of A Focus Report Regarding the Replacement Effluent Treatment Facility Project Proposed by Northern Pulp Nova Scotia Corporation (TOR) (Nova Scotia Environment, 2019). **We write in support of Friends of the Northumberland Straits' continued efforts to ensure there is no pipe & no extension to the Boat Harbour Act.** The Northumberland Strait (NS) is a synergistic finite body of water which supports life on every coastline it meets at 5 000 years old (Brooke, 2015). The NS is a food source, a tourism spectacle & a recreational wonderland. Coined Canada's Ocean Playground, Nova Scotia has one feature that stands out above all others: The Sea. NPNSC's mill in Abercrombie is an unabiding manmade structure unlike The NS which should subsist throughout time. This balance must be scaled in your consideration of NPNSCs proposed project effects on The NS. Randall has thirty years experience fishing lobster, rock crab, herring & scallops in area 26A1 on The NS. He has always supported solution-focused progress in the area of discussion. Nadine grew up being involved in the fishery and passionate that this environment is a treasure deserving the commitment of Our Government to ensure that The NS is further examined before NPNSCs proposed project is granted your approval (Appendix A). We have no confidence NPNSCs proposed plan could be deemed to be free-from-harm for The NS or the people living in it as we urge you to be responsible at this time. **We insist you order independent, third party EAR to further study The NS before you grant approval of NPNSC's proposed project as we are concerned for how said project will add pollutants where we live & work.**

Honorable Minister Wilson, we raise the following issues for your consideration:

- **Further understanding of the future results of climate change.** We would like further consideration made for the effects of climate change in the area related to (r/t) NPNSC's proposed project. With each passing season that we are fortunate to sail The NS, we are witness to changes in its conditions which are indubitably r/t climate change. Storm surges in the area have intensified greatly as climate events such as hurricanes occur with more strength & frequency. We watch feet of coastline shift or disappear with forceful storms. Researchers state "We also conclude that it is likely that climate warming will cause Atlantic hurricanes in the coming century have higher rainfall rates than present-day hurricanes, and medium confidence that they will be more intense (higher peak winds and lower central pressures) on average. In our view, it is uncertain how the annual number of Atlantic tropical storms will change over the 21st century (Global Fluid Dynamics Laboratory, 2019)." The proposed NPNSC project will cause displacement of land by seawater in a time where we are already trying to understand & lessen the impact of climate change on our shoreline. NPNSC is a repeat offender of environmental harm & we lack confidence in their proposed project. In 2016 NPNSC was certified under the Environmental Offenders Registry & charged under Pollution Prevention provisions of the Fisheries Act (Government of Canada, 2016). They have a proven track record of causing harm to the fishing environment. On occasions where effluent leaks have occurred NPNSC grants little freedom of information to the public which is a source of great public concern as " Friends of the Northumberland Strait issued a news release Tuesday saying its membership is frustrated that after more than three months, the province has released no information about the size or cause of the leak last year near Pictou, N.S. (Tutton, 2019)." The public cannot trust NPNSC's communication r/t environmental effects of its operation & public angst related to severe, persistent environmental effects of NPNSC's proposed project must be weighed at this time. An independent EAR examining climate change in The NS is necessary to examine how the proposed project would affect an already fragile environment.
- **NPNSFR Item & Appendices 3 (NPNSC) response to TOR Item 3: Facility Design, Construction & Operation and Maintenance of NPNSC's proposed project (Nova**

Scotia Environment). Insufficient data has been provided by NPNS related to the likelihood of harm or possible examples of malfunction and catastrophic events r/t this proposed project; the controls & consequences of which remain completely unknown. In the event of an environmental disaster r/t NPNSC's proposed project preventative responsibility comes down to the decision you are currently being asked to make. The NS environment & inhabitants deserve the right-of-way when it comes to your decision in response to the project proposed by NPNSC. Honorable Minister Wilson order an EAR to be necessary before NPNSC proceeds with a project that could in any way utilize The NS as a dumping ground. An independent EAR is necessary to ensure the proposed NPNSCs proposed project does not pose a catastrophic risk to The NS.

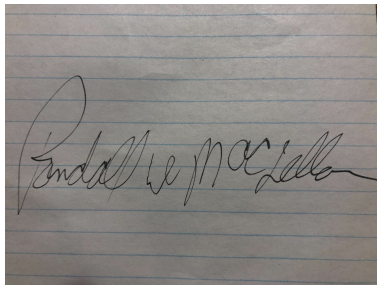
- **NPNSFR Item & Appendices 7 (NPNSC) response to TOR Item 7: Fish & Fish habitat (Nova Scotia Environment).** The delicate conditions of The NS sustain the commercial fishery that we make a living at. NPNSCs proposed project will have malevolent, contemptible affects as it effectively pollutes a fishing area; a food source & cultural ethos. Fishing industry in the area in the area will endure a negative impact of the pollutants introduced to the NS by NPNSC. There is enough 'bad press' r/t to the quality of lobster caught in the area due to NPNSC operation without these pollutants being released continuously into a fishing area. The NS receives no compensation for the loss of environment related to NPNS's proposed project yet it will take a net loss with the introduction of contaminants into its body. The effects of said proposed project create net-loss, negatively impacting a food source & expunge the natural state of The NS. An independent EAR must be ordered to address TOR Item 7 (Nova Scotia Environment) to ensure NPNSC's proposed project r/t the fishing industry on The NS.
 - **NPNSFR Figure 7.3-3 (NPNSC, p. 130).** Insufficient data r/t buoy locations collected over three days in 2019 as it is common practice to move lobster trawls are daily as you do not catch lobster tomorrow where you caught them today. Where are buoys are located varies day by day, week by week, season by season. The entire marine area encompassed by this map is a fishing area used by the commercial lobster fishery & bouys are located throughout the area that is not indicated for lobster harvest.

- **NPNSFR Figure 7.3-4 (NPNSC, p. 131).** Lobster is harvested in a greater area than indicated by this incomplete and insufficient data.
- **NPNSFR Figure 7.3-5 (NPNSC, p. 132).** “Atlantic mackerel and Atlantic herring are found in the Outer Caribou Harbour/ Northumberland Strait (Figure 7.3-5) at depths of 10 m and greater. The nearest mackerel harvest area is well outside the proposed pipeline footprint and more than 2 km northwest of the proposed diffuser location; however, the proposed pipeline route will interact with the herring fishery (NPNSC, p.132).” The herring fishery in this area is at risk before this proposed interaction with NPNSC. Katie Schleit, a senior fisheries advisor with Oceans North states "We're also facing increasing threats from climate change, particularly in the gulf...The scientific report is showing that fishing levels are generally considered quite high for a stock that's not doing very well(Yarr, 2019)." We ask you to be prudent when considering the effects of NSNPCs proposed project on the herring fishery by ordering an independent EAR before its approval.
- **NPNSFR Table 7.3-2: Summary of Marine Impacts, Mitigation Measures, & Overall Significance (NPNSC, p.142).** We are in disagreement with findings that overall effects of NPNSCs proposed project on water quality/ physical effect r/t the American Lobster (AL) considered to be generally minor, localized and generally reversible & not significant when “changes to water quality due the discharge of treated effluent to the Northumberland Strait at the diffuser including reduced salinity and increased water temperature which may influence reproduction, survival and growth of larval and adult Lobster outfall location (NPNSC, p. 144).” NPNSFR plans for mitigation through “Provision of habitat offsetting, if required (p.144).” What exactly is meant by ‘habitat offsetting’ of the AL? There are no examples provided by NPNSC r/t habitat offsetting in terms of fishery outcomes. Elucidation of said provisions, effects r/t the AL as industry in the area and possible mediation measure is vital before approval is given to NPNSC’s proposed project. AL is a significant resource of The NS and “makes up the largest proportion of the CRA fishery in Caribou Harbour and Pictou Harbour, with all life cycle stages represented within this area (NPNSC, p. 129).”

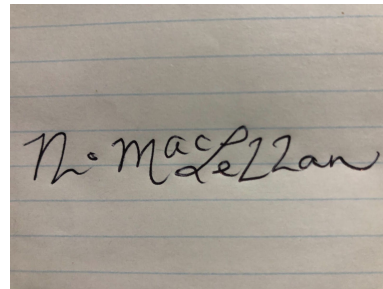
The Port of Caribou is commonly known to have the largest fishing fleet in Nova Scotia, which is known worldwide for its lobster. The habitat of the AL & the industry it sustains will be directly impacted by NPNSC's proposed project in which "The vertical mixing at the diffuser due to differences in effluent density (i.e. temperature and salinity) will negate interactions of the effluent with the benthic environment and adult Lobster (NPNSC, p. 144)." How are immature lobsters affected by said effects? Further clarification via an independent EAR is necessary r/t mitigation provisions & measures r/t effects of NPNSCs proposed project to the AL.

As Minister of Environment assiduity is necessary in the matters of NPNSCs proposed effluent treatment facility project & honoring the Boat Harbour Act. The severe, persistent environmental effects & concerns of the public of NPNSC's proposed projects outcomes cannot be projected without further examination of The NS via an EAR. Without this study being ordered the project proposed should not be seen through as there is a current lack of understanding of the above issues. We plea with you to order an independent EAR for the at this time.

Many thanks,

A photograph of a handwritten signature in cursive on lined paper. The signature appears to read "Randall W. MacLellan".

Randall W. MacLellan

A photograph of a handwritten signature in cursive on lined paper. The signature appears to read "Nadine C. MacLellan".

Nadine C. MacLellan

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Appendix

Appendix A Nadine C. MacLellan letter to Minister Miller (8 March 2019)

Honourable Margaret Miller, Minister of Environment
Environmental Assessment Branch, Nova Scotia Environment
P.O. Box 442 Halifax, Nova Scotia B3J 2P8

Nadine C. MacLellan
2001 West Branch Road
River John, Nova Scotia
B0K 1N0

Minister Miller,



I am contacting you in relation to Northern Pulp's Replacement Effluent Treatment Facility Project. I am addressing you as someone who makes their living in the fishing area 26A in the Gulf of St. Lawrence. These fishing grounds encompass the area of the southeastern part of Northumberland Strait between Nova Scotia and Prince Edward Island and the western half between Prince Edward Island and Cape Breton. Firstly I would like commend each of the members in my community who are addressing the issue in of Northern Pulp's presence on The Northumberland Strait. I have never publicly expressed my feelings regarding the environmental atrocity that is Northern Pulp but cannot

go without taking this opportunity to make this personal appeal to you. My community is often regarded as being divided but many have been brought together by their concern over the treatment of our waters & residents. I could not be prouder to be from Nova Scotia except that our representation is truly failing us by supporting an industry over its own citizens. You have been disregarding the voices of a concerned community. **I urge you to recognize your support of Northern Pulp over the people of this area as the destruction of the cultural heritage of communities along the Northern Shores of Nova Scotia & take commendable action in**

requiring an environmental assessment report (EAR) to be conducted Canadian Environmental Assessment Agency (CEAA). Together with the supported of obedient Provincial Governments the pulp mill operation in our community have a continuous track record of negating our community and neglecting our environment. Nova Scotia's culture was formed by our & continues to develop from the interactions within environment of our scenic coastlines. **I demand you address the environmental effect of Northern Pulp's operation on the culture of Northern Nova Scotia by stepping away from the situation & ordering an EAR of the proposed area from the CEAA before any actions can taken in relation to the proposed pipeline.**

I can attest that the culture contained & surrounding the area of the proposed pipeline is boundless compared to the value of the pulp produced at Northern Pulp in Abercrombie, Nova Scotia. I was raised in a 'fishing family' in Pictou County, Nova Scotia; graduating from in Alma from Northumberland Regional High School where I received my first formal education on the injustices related to the area's pulp mill through a law class. At the time my peers & I would get inundated with the presence of sulfur and other pollutants in the air as we learned. I continued my studies at Dalhousie University's School of Nursing learning the significance of social and cultural determinants of health. After attending a lecture on environmental racism I discussed the concept with my Father; while he had never heard the terminology before that he was very much aware of its effects on the coastline. When I developed bipolar disorder the Northumberland Strait was the therapeutic entity that sought me through. I could be dead but I'm a fisherman. The Strait taught me how to transition through life; it gifts me with joy, gratitude & some pride in myself. My Father forced me onto the water each morning & into having a purpose. I will never find the words to describe how pushing off of our wharf, spending the day the day on my water & returning home with bounty healed me. I've been vegetarian for fifteen years & I've never eaten a lobster. As a child I watched my Grandfather & Father struggle with daily catches that were in the double digits poundwise. Today we benefit from the environmental effects of a warming planet; there is no better feeling knowing you're top boat & I love seeing my Brother & Grandfather floating as we sail in with catches that are ten times what they were in the early 2000s. I know programs in the area are benefiting us too but we as a society must address the environmental conundrum that is the Northumberland Strait. A decade has passed since I first

brought up the environmental racism with my Father yet there is significant distress in the area regarding the multitude of issues caused by Northern Pulp's continued operation. My father has remained a positive example for me by continuously expressing his belief that the conversation regarding these issues must be solution-focused. My sister's partner is an engineer technician at Northern Pulp and my partner works the forestry which is heavily dependent on the funding provided by the pulp and paper industry. As a family I feel like we have done very well by maintaining respectful discussion regarding the operation of Northern Pulp. However I am deeply distressed by the Provincial Government's delinquency in caring for our waters & am now asking you to consider the direct environmental effects on the culture of this area as your personal decision. **I urge you to hand off the responsibilities of an EAR to the CEAA before the situation worsens.**

I make my living on the Northumberland Strait in more than one way. I am a deckhand, working alongside my Brother, Father & paternal Grandfather out of Skinner's Cove in River John, Nova Scotia. Since 2017 I have supplemented my income by working in the tourism industry as a server at The Pictou Lodge; an institution built in 1926 that accommodates those visiting the area. Here I meet people from all over the world who are travel to our beautiful shoreline because of the nature of The Northumberland Strait. Harkening first hand accounts of what Come-From-Aways cull on our shores frames the global perspective on Nova Scotia as a whole. These conversations have defined how fortunate I feel to live & work here; I have a great love for the sea. I assure you that our culture and waters are worth more than pulp. If Northern Pulp continues to operate alongside a submissive provincial government I know the tourism industry this area has worked to build up will collapse with the environment; No one wants to vacation in a cesspool. **The culture here is informed by the environment which will be affected if you permit Northern Pulp to operate without an EAR conducted by the CEAA.**



My partner & I have both grown up in homes that our Great-Great-Grandfathers had lived in. We have both acquired knowledge informed by a multi-generational relationship with this environment. His family has been farming the shoreline of Caribou Harbour since

arriving here from Scotland in the early 1800s. This area is the proposed site of Northern Pulp's pipeline. **I encourage you to think of it as ground zero & your legacy by acknowledging the significant cultural value of the Northumberland Strait in handing off responsibility of an EAR to the CEAA.** The culture of this area is indubitably conjoined with commercial fishing which both of our families sustained themselves from. In 1939 my Grandfather was born in a farmhouse very near Skinner's Cove & has been sailing 'The Strait' since childhood. The first vessel he operated was one he had fashioned by welding two car hoods together. He continues to fish at 79 & has witnessed the coastal transformation of this area over his lifetime. Fishing beside my Brother, Father and Grandfather gladdens my heart in ways that I cannot express in words. I fear that I am at the end a line and will be unable to pass on my knowledge and skill set to a future generation because my government doesn't value the very environment it exist within. My Grandfather's experience is quintessential to who I am as a person; part of this experience is how this environment has been altered by the undeniable results of a changing, polluted environment. He recalls bluffs that have eroded, forests that no longer exist & much, much colder waters. I know our commercial fishing operation will be unsustainable if the mill pollutes our beautiful Strait. I am disgusted by the multitudes of wrongdoings by industry & governments alike since the mill began its operation in Abercrombie. **There must be an objective, independent EAR completed by the CEAA of the Northumberland Strait to address the environmental effects of Northern Pulp's operation on the scenic coastline to identifying how these effects will impact the socio-economic conditions on our culture which has significant historic and future value.**

Those of us who live, work & play on The Northumberland Strait can palpate the environmental effects of the unsustainable pulp & paper industry. There is no wonder why. For a short period during the 1970s my Grandfather supported his family by working at Canso Chemicals, the company who made "the caustic" required for the pulp mill. During this time my Grandfather had a continuous cough, skin rash & eye irritation. At that time he sought the opinion of his family physician Dr. Skinner regarding his ailments who told my Grandfather he was insane for working there. My grandfather has always reported to me that he felt helpless and silenced as Canso Chemicals released straight, untreated waste into Pictou Harbour during early morning

hours. He left his employment at Canso Chemicals knowing that they waited until children were sleeping in their beds to illegally dump toxic effluent. If you think you know what dangers are present in under Our waters you have no sense of the situation whatsoever. **An EAR of the Northumberland Strait must be conducted by the CEAA to determine the environmental effects of pulp production in Abercrombie before any decisions regarding future production in the area. In vivo veritas.**

By conforming to Northern Pulps demands I ensure you that you will be forever regarded as the executioner of a culture. I know this community & you are unprepared for dealing with the consequences of not handing an EAR to the CEAA. **Take action by washing your hands clean of any decision-making by electing the CEAA to do an EAR at the proposed site.** I assure you that otherwise the Provincial Government will overloaded: there will be an impassable, occupied causeway. I believe a reasonable answer to having effluent dumped in my workspace is having it tanked & dumped where those responsible for that work. If you expect this community to live & work in effluent I would expect the same from you. **Order an independent EAR conducted by the CEAA or you will be unleashing an inferno of anguish on this community & our culture beyond anything you could possibly conceive of.**

With some hope,

A handwritten signature in black ink, appearing to read 'N. MacLellan'. The signature is fluid and cursive, with a large initial 'N' and 'M'.

Nadine C. MacLellan