

November 7, 2019

The Hon. Gordon Wilson
Minister of the Environment
Nova Scotia

Via email: ea.novascotia.ca

Dear Mr. Minister:

I am writing in reference to the Focus Report on Northern Pulp's Proposed Replacement Effluent Treatment Facility Project.

After consideration of the information provided by Northern Pulp in its Focus Report I urge you to **reject** this proposal for a replacement Effluent Treatment Facility for the following reasons:

- Despite the measures outlined in the Focus Report there remains a high degree of risk to the land and marine environment of Caribou Harbour and the Northumberland Strait. The science within provides no guarantee that the proposed ETF poses no risk of irreparable damage and degradation to this uniquely sensitive estuarial environment;
- The Focus Report does not take into consideration either the additional threat to the ocean environment due to global climate change as described in the report released by the Intergovernmental Panel on Climate Change in September or the introduction of new Pulp and Paper Effluent Regulations (PPER) to be introduced by the Government of Canada in 2021;
- The proposed ETF would disproportionately affect the history, culture and economy of Pictou County by disrupting the fishing and tourism industries in the impact area and imposing an industrial effluent disposal site on a highly sensitive physical and cultural environment.

I am not a scientist. My area of expertise is in the area of documentary filmmaking, and research. I have lived in Caribou since 2002 and my property touches the shore of the eastern extent of Caribou Harbour, specifically the area once known as the Little Entrance. I have explored the rich history of the area as demonstrated by works such as the online history of Maritime Packers once located here (www.memoryfactory.ca). My partner has also created work based on the culture of the area (www.cariboumottos.ca). In addition, I recently directed and produced the documentary entitled "The Mill" broadcast on CBC on August 29, 2019 (www.themillfilm.ca). In the making of this documentary I have met and interviewed many people representing different viewpoints regarding the mill, including representatives of the forestry, fishery and the tourism sector. This survey of opinion includes many conversations with representatives of the Pictou Landing First Nation in relation to the impact of Boat Harbour. The list also includes

representatives of Northern Pulp. I believe I have a good understanding of the history and impact of the Northern Pulp mill not only on Pictou County but the entire province of Nova Scotia.

It is my conclusion that the decision to be made by the Government of Nova Scotia in relation to the future of Northern Pulp NS Corp. is the most significant and consequential one to date in this new century. To allow this extremely high risk proposal for a replacement ETF would be a costly mistake that would negatively affect the health, well being and economy of Pictou County and the province as a whole.

I am not an engineer or scientist but I have sufficient education and experience to think analytically. I also have been observing the environment of Caribou Harbour closely for twenty years. I have walked numerous times around Munroe's Island, kayaked to the proposed site of the discharge pipe in the waters outside of Caribou Harbour and have observed the wildlife of this special place. I have reviewed the data in Northern Pulp's Focus Report submitted in support of this proposal. I have also researched numerous articles about the impact pulp mills have on the environment. Science agrees that pulp mills without doubt have a deleterious impact the environment but there is no consensus in science about the degree of these environmental or health impacts. The debate is really about what impact is acceptable. The Northern Pulp Focus Report provides a great deal of data, more than could possibly be reasonable for a layperson to evaluate within thirty days. Add to this the fact that there have been no public consultations initiated by Northern Pulp about this report that could address questions from the public. Most of the data involves the engineering decisions Northern Pulp will undertake in planning and executing its replacement ETF. The science in the report is not definitive but approximate based on modeling and upon data sufficient to make certain assumptions about the conditions and environment that a new ETF will encounter. In other words it is an educated guess.

On the other hand there is a mounting scientific consensus that societies collectively will be affected by climate change, including significant changes to the ocean environment that will present new challenges to coastal communities. As reported in Canada's Oceans Now: Atlantic Ecosystems 2018 released by Fisheries and Oceans Canada, all of the species fished commercially in the Atlantic region have declined or are under stress. Northern Pulp's Focus Report makes no mention of these factors. In fact there is little mention of the local fishery in Caribou or that area of the Northumberland Strait. There is no acknowledgement that the proposed site for the effluent dispersal array is directly within Fishing Area 26A, the heart of the local commercial fishery. Outside of the environmental threat to fishing in the region, there is no acknowledgement of the incompatibility between a dispersal zone for treated industrial effluent and a perception of a clean fishery in this area.

Another aspect of determining an objective evaluation of this proposed ETF is the record of this pulp mill's existing ETF. This record indicates that there have been

leaks in the effluent pipe from the outset up to the present (check out the history of the mill in this timeline: <http://themillfilm.ca/the-history/>) The Focus Report assumes that using regulated and certified materials and employing reliable construction techniques in the building the pipeline will mitigate risk to an acceptable level. History indicates that this is not a safe assumption instead it indicates that leaks should be expected. NS Environment has yet to release a report on the impact of the mill's most recent leak in October 2018. The location of the proposed new effluent pipe is so hazardous that such a delay would be unacceptable.

This proposed ETF is an extreme high-risk enterprise with little acknowledgement of the downside effects or costs to the public in the case of failure. Construction of the pipeline assumes the right to: 1) exploit public infrastructure 2) contravene prohibitions intended to protect the watershed for the Town of Pictou and 3) expropriate a major section of an environmentally protected coastline (and a major location for fishing and tourism) for use as an industrial site. It is willing to take this risk because of BATEA, Best Available Technology Economically Achievable principles. While effective in maintaining the mills operations to the benefit of the mill's owners these principles are detrimental to the public purse as ultimately Nova Scotia is on the hook financially for any system failure. The long-term public interest must be the highest consideration in making this assessment. This proposal does not satisfy numerous tests of social accountability or responsibility, not the least of which is the unwillingness to make an adequate investment into a new plant that would not impose such a risk to the public. The disproportionate domain over this area granted to Northern Pulp should this project go ahead would unacceptably dominate the right of others, public and private, to the peaceful use and enjoyment of this area.

The willingness to engineer such a desperate and risky solution to the problem of losing the Boat Harbour ETF indicates Northern Pulp's short-term investment strategy. Building a new mill is not economically achievable because the natural resources available are not to scale with the cost of a new, environmentally efficient, plant. Northern Pulp's business model is to exploit its aging facility and its access to Nova Scotia's resource until it is no longer viable. It also expects the public to pay the cost of building a new ETF. When Northern Pulp leaves, as it inevitably will, the public is on the hook for any environmental clean up.

The terms of reference for the Focus Report does not include the wide extent of the forest industry in its purview. None the less, forests overall are a necessary consideration for your Ministry to include in its analysis; after all, this entire proposal is focused on the dispersal of forest residue into the ocean environment. What goes out must first come in.

A prominent theme in the warnings contained in the scientific discussion of climate change is the rapid loss of forest environments around the globe. The Leahy Report of 2018 was partially in response to this acknowledged threat. As much as there is

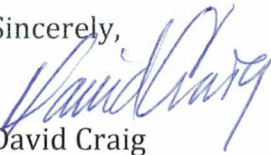
local concern over the proposed replacement ETF in Caribou there is growing public concern that the NS Government's management of Crown land in concert with the pulp industry is detrimental to health of Nova Scotia's forests and wildlife habitat.

Nova Scotia cannot afford to approve this proposed replacement ETF. It would require significant public investment in pursuit of a policy of resource exploitation that has short-term benefit to Northern Pulp NS Corp. but significant long-term costs for the public. It also discounts the present and increasing value of natural forest environments and reduces the value of forests down to the artificially low price of pulpwood. This is no longer acceptable. Public policy must change from exploitation to preservation. Nova Scotia's industrial forest sector must adapt to a changing economy increasingly based on acknowledging the limits on consumption. Nova Scotia cannot compromise the economy of the future by clinging to the economy of the past.

Preservation and protection of the environment is the key to the future economy of Nova Scotia. This is the scientific approach that must take precedence in consideration of a proposal that is inherently detrimental to the environment, lacking in accountability and reckless in regard to public safety and the long term public good.

Reject this proposal.

Sincerely,



David Craig