



FRIENDS OF THE NORTHUMBERLAND STRAIT

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September 27, 2018

Honourable Margaret Miller
Office of the Minister
Nova Scotia Environment
PO Box 442
Halifax, Nova Scotia B3J2P8
minister.environment@novascotia.ca

Dear Minister Miller:

Re: Provincial Environmental Assessment of Northern Pulp Effluent Treatment Facility (ETF)

I am writing on behalf of Friends of the Northumberland Strait, to draw your attention to the attached letter dated September 19, 2018. The letter requests that the Minister of Environment and Climate Change designate Northern Pulp's proposed effluent treatment plan as a physical activity requiring a federal environmental assessment pursuant to section 14 of the *Canadian Environmental Assessment Act 2012*.

In our submission to CEAA, we state:

Friends of the Northumberland Strait believes that the Nova Scotia Government has significant conflicts of interest which compromise its neutrality and prevent the Provincial Environment Minister from conducting an unbiased environmental assessment of Northern Pulp's proposed new ETF. The circumstances giving rise to these conflicts of interest are set out below. Due to the Province's compromised position, we believe that the environmental assessment of this project should not be left in Provincial hands.

Our letter provides detailed reasoning organized under four major headings explaining why we believe this to be true.

1. The Province has a direct financial and proprietary interest in the current design and construction of the proposed ETF

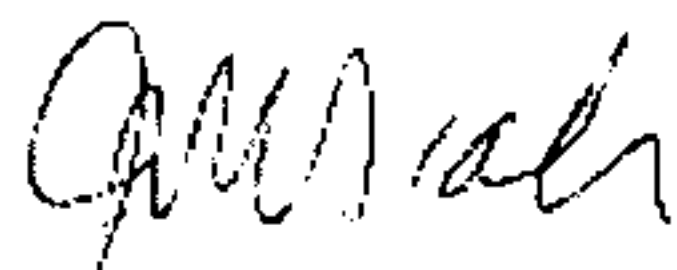
2. The Province may face direct and significant financial consequences and litigation if it does not quickly approve the environmental assessment
3. The Province has been unwilling to communicate with the local community that would be affected by the proposed ETF
4. The former lawyer and lobbyist for Northern Pulp is now a senior civil servant in the Provincial Government.

We are sending this document to you in your capacity as Minister of the provincial department presently responsible for conducting an environmental assessment of Northern Pulp's proposed project.

By this letter, we are requesting that you acknowledge that there are conflicts of interest which compromise your government's neutrality on this issue. We are asking that your Department step aside from conducting the environmental assessment of Northern Pulp's proposed new ETF in favour of having the environmental assessment conducted by the Canadian Environmental Assessment Agency under *Canadian Environmental Assessment Act 2012*.

We look forward to hearing from you on this matter.

Sincerely,



Jill Graham-Scanlan
Friends of the Northumberland Strait

Attachment