

Trout Unlimited Canada



Truite Illimitée Canada

The Honourable Catherine McKenna  
Minister of Environment and Climate Change  
200 Sacré-Coeur Boulevard  
Gatineau QC, K1A 0H3

The Honourable Dominic LeBlanc  
Minister, Fisheries and Oceans Canada  
200 Kent St Station 15N100  
Ottawa ON, K1A 0E6

**Re: Northumberland Strait- Northern Pulp Effluent Treatment Facility**

Dear Ministers,

TUC is aware of the Northern Pulp's proposal for their effluent treatment plant replacement in Nova Scotia. We are very concerned about the harm to fish and fish habitat that could result from Northern Pulp's proposal to discharge 70-90 million litres of treated effluent from a bleached kraft mill every day into the prime fishing grounds of the Northumberland Strait.

TUC is a national, not-for-profit, conservation organization and charity that is science-based and volunteer-driven. Partners and volunteers are paramount to the numerous successful river restoration projects we implement every year across Canada. Our work is ultimately focused on rebuilding Canada's Natural Infrastructure through programs and projects that protect and enhance water quality, water flow, aquatic life and community health. Healthy natural infrastructure within watershed creates additional benefits of a healthier living environment for people as well as the environment. TUC is proud of the critical role our organization has played in the protection of Canada's aquatic environments for over 40 years and the value of this work to the lives of Canadians.

Northern Pulp's effluent will be fresh water, however the Strait is salt water and its species require a certain level of salinity to survive. Also worth noting, the effluent will be at 25°C in the winter and 37°C in the summer. The Strait is home to only COLD water species. These temps will absolutely change the diversity and make up of this sensitive and important marine ecosystem. This will surely increase the overall temperatures of the Strait over time due to the high volume of effluent being pumped per day.

The effluent will contain chlorines, dioxins, metals, among other constituents. All can have catastrophic effects on marine life over many years of bioaccumulation. Laboratory studies using individual chlorinated organic compounds that are commonly discharged from bleached pulp mills have demonstrated such chronic effects as deformities, and embryo and larval mortalities in fish. These chronic effects include significant irreversible factors which jeopardize the continuance of the species and the integrity of the ecosystem (Environment Canada, 1991). Another concern of this effluent discharge is the already large dead zone in the Northumberland Strait between PEI and Nova Scotia. There is big worry that this additional amount of effluent will exacerbate this dead zone.

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Northern Pulp is requesting for a Class 1 Environmental Assessment which takes 50 days from the time they submit it. This process is nothing more than a few public meetings. The Process should at the least be listed under the Class 2 Environmental Assessment that takes 257 days of very specific tests and studies.

With these thoughts in mind, TUC strongly urges the need for a more rigorous, science-based review of this project in order to adequately protect the health of the aquatic life, water, local economy and humans living in the area. Thank you for the opportunity to provide input at this stage of the process.

Sincerely,

A handwritten signature in black ink that reads "Kelly Mason".

Kelly Mason

Ontario Biologist, Trout Unlimited Canada

**References:**

Environment Canada. 1991. Canadian Environmental Protection Act: Effluents from Pulp Mills Using Bleaching. Available Online at: [https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/ewh-semt/alt\\_formats/hecs-sesc/pdf/pubs/contaminants/psl1isp1/pulp\\_mill\\_effluents\\_pate\\_blanchie/pulp\\_bleaching-pate\\_blanchie-eng.pdf](https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/ewh-semt/alt_formats/hecs-sesc/pdf/pubs/contaminants/psl1isp1/pulp_mill_effluents_pate_blanchie/pulp_bleaching-pate_blanchie-eng.pdf). Accessed May 31, 2018.

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