



June 5, 2018

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

**Re: Request for Designation for CEAA Federal Assessment – Northern Pulp Effluent Treatment Plan**

Dear Minister McKenna,

I am writing on behalf of the Ecology Action Centre (EAC) to request that the Northern Pulp Effluent Treatment Project be designated under the Canadian Environmental Assessment Act (CEAA) for a Federal Environmental Assessment. Where pulp-mills are specifically listed under s.18 of the "Regulations Designating Physical Activities" under s.49 of the CEAA, the Canadian Environmentally Assessment Agency should be the responsible authority for the project.

Northern Pulp put forward this project as their sole solution to closing the Boat Harbour waste lagoon, which has become one of Canada's most contaminated sites. They plan on placing an effluent discharge pipe at the edge of Pictou Harbour that would to release 70-90 million litres of treated effluent into the Northumberland Strait everyday. Northern Pulp claims not only will the environmental impact be minimal because of the effluent's dilution in the Strait, but also that this pipe is necessary for the mill's operation. We strongly oppose both of these claims.

Although the effluent would be diluted in the Strait, Northern Pulp fails to consider the cumulative impact of releasing massive quantities of warm fresh-water into a cold, salt-water marine ecosystem. Additionally, the levels of effluent they are proposing to release are only slightly below the maximum allowed, and despite dilution occurring, it is not enough to lower their environmental impact to an appropriate level. The mill is able to alter their process, stop bleaching, and use a closed-loop system. This is the solution that EAC supports and should be the one that is deemed appropriate, not the straight pipe plan. The only obstacle preventing the preferable closed-loop system is the cost and a slight tweak to their output product (producing non-bleached kraft pulp instead of bleached kraft pulp). Cost is not a valid reason to allow for the destruction of one of the region's most vital ecosystems.

The Government of Nova Scotia is in a conflict of interest as result of indemnity agreements they signed in the past. The agreements effectively relieves Northern Pulp of paying costs associated with effluent treatment or claims against them for the impacts of their liquid pollution's release, and shifts the responsibility to the Province. This implies that Nova Scotia must pay both the compensation for the cleanup of Boat Harbour and the cost of this new pipe project. Therefore, the province will naturally seek to minimize costs, rather than ensure affair, accurate and robust environmental assessment. This conflict of interest, and the fact that the effects of the effluent would have significant direct impacts on waters affecting all three Maritime provinces should be sufficient for the project to qualify for a full Federal Environmental Assessment.

Distress across the Maritimes and Mi'kmaq communities is not only fueled by the impact that will be felt on local fisheries, but also the impact on the health of the Northumberland Strait and the communities themselves. We strongly support the public's opposition to this simplistic and dangerous proposal that would effectively have the taxpayers of Nova Scotia fund the destruction of the Northumberland Strait and the livelihoods of thousands of citizens in three provinces. We urge you to do the same.

Respectfully yours,

Raymond Plourde  
Wilderness Coordinator

