

February 6, 2019

The Honourable Jonathan Wilkinson,  
Minister of Fisheries, Oceans and the Canadian  
Coast Guard  
House of Commons  
Ottawa, Ontario  
K1A0A6



Dear Minister and Sirs/Madams,

Northern Pulp, a bleached Kraft pulp company (and the Province of Nova Scotia) are planning to construct an effluent pipe at the location of the red star in the diagram below. The pipe is to replace the Boat Harbour Effluent treatment facility due for closure in January 2020. Boat Harbour is deemed to be one of the most toxic sites in Canada and has been a horrific injustice inflicted on Pictou Landing First Nations for over half a century.

**This proposed pipe is designed to discharge up to (66)(93) million liters of 37 degree + 'treated' effluent daily into the Northumberland Strait, right in the middle of the last major active spawning area for 16F herring. The complex tides in this area, both in speed and direction, would ensure that the effluent would settle out across the entire remaining herring spawning grounds. This is the most dynamic area in the Eastern Northumberland Strait and a critical spawning ground for Lobster, Rock Crab, Herring, Ground fish and many other species.**



The local Herring Spawning Stock is depleted and in the Cautious Zone. A Gulf of Saint Lawrence wide phenomenon. The spawning area has compressed in the past few years as the stock declined to the areas outlined above. Very little herring spawning occurred anywhere else in the Eastern Gulf.

The Gulf of St Lawrence is an inland sea with counter clockwise currents that only exchanges its waters with the Atlantic once a year. It is one of the most precious marine ecosystems on earth with thousands of marine species who, spawn, nurse and migrate annually and has sensitive life stages of marine organisms present year around. It provides sustainable multi species fisheries for coastal communities in NS, NB, PEI, QC and NL. Given the rapid deoxygenation now happening in this fragile body of water (see link below), the Gulf of St Lawrence needs immediate protection, not further degradation. Most seriously, it does not need 'treated' Kraft bleached pulp effluent going into sensitive herring spawning waters, now or ever.

<http://www.digitaljournal.com/tech-and-science/science/new-study-gulf-of-st-lawrence-shows-a-dramatic-oxygen-decline/article/532340>

Given that DFO scientists recently reported a disturbing picture for the southern gulf of St Lawrence cod, warning of extinction by mid century, ( see link below), where is the Precautionary Approach? Habitat Management? Marine Protected Regions?

<https://www.cbc.ca/news/canada/nova-scotia/southern-gulf-of-st-lawrence-cod-could-be-extinct-by-mid-century-report-1.4966889>

The Proponents paint a picture of this effluent as almost pure holy water. They claim it surpasses all Provincial or Federal guidelines for effluent discharges yet it created one of the most toxic sites in Canada at Boat Harbour. Any online search of pulp mill effluent turns up articles with quotes like,

- *Environmental effects on the marine environment are particularly poorly researched, even though some of the limited amount of data available suggests that lignin breakdown products of high molecular weight are not only persistent, but also highly toxic to sea urchin eggs, sperm and mussel larvae. (Gary Cherr, Bodega Bay; paper is available from ECOPOL)*
- *The role of non-bleaching factors is big and pulp wash water for example, can be more toxic than bleach plant effluent.*
- *chlorate will compete with nitrate for uptake by algae, yet chlorate acts as a herbicide rather than a nutrient.*
- *Chlorate is efficiently removed through anaerobic secondary treatment systems (eg. Lagoons), but removal in activated sludge systems is not as successful.*
- *These long-term fish exposures are laborious, time-consuming, and expensive. However, they provide some of the most convincing evidence linking PME (pulp mill effluent) exposure to reproductive effects in fish*

The list goes on and on. They claim it will be non-detectable at 100 meters. That's magic. We challenge you to go down to Boat Harbour and stand there for 10 minutes. The treated effluent is certainly detectable there at 100 meters.

This Effluent Pipe and proposal has been presented twice in the past, first in 1994 and a variation in 2004. The first of these, "The Initial Environmental Assessment for the Boat Harbour pipeline and diffuser" proposal was presented in September of 1994 and "Returning Boat Harbour to a Tidal Estuary" in 2004. Neither passed muster at the time and either failed environmental assessment or were

abandoned for other reasons. Details in writing on the abandonment of the proposals are sketchy but no PIPE ever went out into the Strait.

The Nova Scotia Department of Environment has diminished this toxic pipe proposal to “an addition to an existing facility” and as such, subject to only a Class 1 Environmental Assessment rather than a more rigorous Federal Class 2 assessment. This is inaccurate and irresponsible. The increase in suspended solids with this proposed AST system and its inevitable settling on spawning grounds should trigger the most vigorous assessment and likely scuttle the project entirely.

The Precautionary Approach does not start and stop with regulating fisheries. DFO is not exercising and implementing its responsibility under the Precautionary Approach. We believe your Department scuttled previous attempts to pump this toxic waste into a very productive marine habitat, nursery and spawning area and we fully expect you to do so again.

Mr. Minister, where is your intervention? You have an obligation to protect fish habitat under the Fisheries Act.

**Your predecessor Minister of Fisheries and Oceans Brian Tobin made direct reference to his powers under the Fisheries Act to stop the proposed pipe in 1994. See the newspaper clipping below.**

**We are requesting you to do the same and look forward to your prompt response to this urgent matter.**

Respectfully,  
Greg Egilsson - Fisher  
Chairman: Gulf NS Herring Federation  
Pictou Nova Scotia  
902-396-7068  
<http://www.saveourseasandshores.ca>

**Honorable Catherine McKenna:** [ec.ministre-minister.ec@canada.ca](mailto:ec.ministre-minister.ec@canada.ca)

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## Attachment

### The Chronicle Herald

Published: 3/26/1994

Day: Saturday

Headlines: **TOBIN VOWS TO PROTECT FISH HABITAT FROM EFFLUENT**

Reporter: BY BRIAN UNDERHILL OTTAWA BUREAU AND THE CANADIAN PRESS

Ottawa – The Nova Scotia government won't be allowed to pipe Boat Harbour effluent into the Northumberland Strait if it poses a threat to fish habitat, federal Fisheries Minister Brian Tobin said Friday. And the minister said a decision on the controversial proposal won't be made until there's a full environmental assessment and fishermen are consulted.

British Columbia Reform MP John Cummins raised the issue during the daily question period, saying groups in the area are justifiably apprehensive over proposals for a new facility to treat effluent from the Scott Maritime Ltd. pulp mill in Abercrombie Point.

Plans are under way for a \$17-million upgrade of the provincially operated Boat Harbour system, which treats about 87 million litres of waste from the nearby mill daily. The province wants to pipe effluent about two kilometres into the Northumberland Strait. The province hopes to award construction contracts by July and complete construction by September 1995.

The issue has generated heated debate in Pictou County. Fishermen fear the proposal could damage spawning grounds and fish stocks, and they've threatened to blockade the project. Mr. Cummins sought assurances the Liberals will not allow damage to the fish habitat.

He said shellfish harvests in some areas off the West Coast had been curtailed "because of poisoning from pulp mill effluents." Tobin said he had an obligation under the Fisheries Act to protect fish habitat. "The easy decisions like not allowing pollutants that would be contrary to the Fisheries Act into critical spawning areas would be easy for us to take. "This government will not compromise conservation habitat for any reason." Mr. Tobin said a full assessment of the proposal has not been completed and no decision will be made until that process is wrapped up.

The province has been negotiating with Scott to get the mill to take over ownership and operation of Boat Harbour. Less stringent discharge regulations would apply if the mill treated its own waste, since it would be considered an on-site plant. Without a change in ownership in the treatment plant, the province will probably not be able to meet federal regulations, even after spending \$17 million on an upgrading plan. Building an on-site treatment plant would cost an estimated \$80 million.