

[Submitted online at: <https://www.novascotia.ca/nse/ea>]

October 31, 2019

Environmental Assessment Branch
Nova Scotia Environment
P.O. Box 442
Halifax, NS, B3J 2P8

Re: Northern Pulp Replacement Effluent Treatment Facility Project Focus Report

Greetings,

We are pleased to have an opportunity to provide comments regarding the Focus Report for the Northern Pulp Replacement Effluent Treatment Facility Project, an essential development for the future of forestry in Nova Scotia.

Unifor proudly represents 230 workers at Northern Pulp, 12,000 workers in Nova Scotia, and 23,000 forestry workers across Canada. We are Canada's largest union in the private sector with 315,000 members in every sector of the economy, and regularly advocate for good jobs, sustainable development, and progressive change for a better future.

From the outset of discussions concerning the future of the Northern Pulp mill, our union has agreed the Boat Harbour facility must close. We firmly believe there can be a solution that supports good jobs, protects the environment and respects First Nations' rights. Our members, and their families, live and work in the communities around the mill and have the highest interest in building a truly sustainable future.

The science clearly supports approval

Northern Pulp's proposed wastewater treatment facility Focus Report follows an extensive period of scientific study. The proposed new treatment facility will see the replacement of the existing plant with a state of the art wastewater treatment facility that will result in a significant improvement in the way treated wastewater is discharged. With the implementation of this new facility, Northern Pulp will become one of the most environmentally responsible mills in North America.

/ 2

The Focus Report provides a science-based review arising from more than twenty different investigations and analyses. These scientific analyses include environmental baseline studies, engineering designs, archaeological investigations, receiving water modeling, and Mi'kmaq Ecological Knowledge Studies, among others.

Not only will the new effluent treatment facility meet all requirements of the *Nova Scotia Environment Act*, it will also comply with several other essential regulations. Project components are designed to meet the federal Pulp and Paper Effluent Regulations, the National Building Code of Canada, the Canadian Standards Association best practices for effluent treatment and pipeline construction, and other design codes and standards. Additionally, all future facility operations would also be conducted under a provincial Industrial Approval. This project will be well regulated to ensure that it meets the highest standards for safe operation and environmental protection.

Based on the assessments made previously, and for the Focus Report, no significant adverse residual environmental effects are predicted for the air environment, fresh water environment or marine environment. Additionally, third party environmental experts have assessed that no significant impacts are expected on any fisheries or fish habitat as a result of this project.

It is our view that the completion of Focus Report provides the science-based evidence that will enable the environmental assessment to be approved.

An excellent record of improved performance

Northern Pulp's replacement effluent treatment facility is the latest of a long series of investments in environmental improvements at the mill. When acquiring Northern Pulp, Paper Excellence saw it as an opportunity to purchase an older mill and invest in operational and environmental improvements to extend its life, the associated economic activity, and related employment.

Understanding the facility needed a considerable amount of work, Paper Excellence took over the mill with a goal to improve safety, efficiency, productivity and to make environmental improvements. More than \$70 million has been invested since 2011 toward reducing effluent flow; reducing odorous, particulate, and greenhouse gas emissions; and to improve air quality monitoring. From the onset of its ownership, Paper Excellence committed to investing in environmental improvements which has led to:

- Reduced odorous emissions by more than 90% on average;
- Reduced recovery boiler particulate emissions by 99% on average;
- Reduced mill-wide particulate emissions by more than 80% on average; and
- Reduced greenhouse gas emissions through the conversion from fuel oil to natural gas.

The environmental record of the mill will be improved even further with the proposed replacement effluent treatment facility.

Strong regulations in a global industry

Canada has world-leading environmental regulation, including some of the most forward thinking and sustainable forestry management legislation and practices in the world. It should be no surprise that Canada leads the world with the highest proportion of our forests officially certified as sustainable. Nova Scotia, like all provinces, has excellent forestry management legislation through the *Nova Scotia Forestry Act*, and continues to modernize and improve on policy and regulation through the *Nova Scotia Code of Forest Practice: A Framework for the Implementation of Sustainable Forest Management*. From all perspectives, forest products made in Nova Scotia meet the very highest global environmental standards.

Having high standards is exactly the right approach for our natural resource industries. It is also a challenge for commodities that compete in a global market that does not operate on a level playing field. The global kraft pulp market is expected to reach 60 million tonnes this year. While Canada continues to improve our already strong environmental and forestry management regulations, that is not necessarily the case elsewhere. Kraft pulp production is growing at a rapid rate across South America and Asia. Some of the countries with the fastest growing forestry industries, particularly in kraft pulp production, are in parts of the world notorious for weak environmental regulation and enforcement, few labour rights and minimal Indigenous rights.

From the broadest environmental and social justice perspective, we should all champion maintaining and expanding forestry production in those nations with strong standards. If Northern Pulp was forced to close, the mill's share of the global market would rapidly be filled from elsewhere, with high odds that it is produced with far lower environmental, labour and Indigenous rights standards.

Northern Pulp performs well compared to other mills

There are 89 pulp and paper mills in Canada operating from coast to coast. In most instances these mills discharge treated air emissions, create solid waste and discharge treated wastewater into rivers, lakes or marine environments. In comparison to other mills, Northern Pulp is now very typical in terms of its emissions footprint and processes.

The Focus Report provides data on treated effluent collected by the independent organization Forest Products Association of Canada, which was used to compare Northern Pulp's effluent performance to Canada's other 22 stand alone Kraft facilities. Additionally, Paper Excellence provided air emissions and solid waste data for its nine other facilities in Canada and France. Keeping in mind that each of these mills already operate in accordance with all existing environmental regulations, the evidence shows that Northern Pulp performs as well, or better, than the majority of the other mills.

Compared to the group of 23 kraft mills in Canada, an analysis of five different measures concerning water use, oxygen demand, sediment and chlorine load shows that Northern Pulp's average ranking was better than half of the other mills. On these five measures, Northern Pulp ranked in the top third on two, in the top half on two others and in the top two-thirds on one.

Similarly, compared to the group of 10 Paper Excellence mills in Canada and France, an analysis of six measures of air emissions and solid waste show that Northern Pulp is right in the middle of the pack, with an average ranking of 5.5 among the ten mills. Moreover, in absolute measurements (as opposed to rankings), in no case was Northern Pulp anywhere near the bottom performers.

Northern Pulp is operating in one of the jurisdictions with among the very highest environmental standards in the world, and already performs better than the majority of mills in Canada and nearly half of Paper Excellence's mills. By all measures, Northern Pulp lands firmly in the middle of an already highly regulated pack. Of course, the mill's environmental record will improve even further with the proposed replacement effluent treatment facility.

The link between a strong environment and strong economy

The *Nova Scotia Environment Act* is recognized as an essential piece of legislation designed to protect our shared environment, and guide our economic development. The *Act* rightly spells out its purpose through a set of principles for sustainable development that should guide its application, including:

The linkage between economic and environmental issues, recognizing that long-term economic prosperity depends upon sound environmental management and that effective environmental protection depends on a strong economy.

It is on this principle that policy-makers need a full understanding of the vital economic role played by Northern Pulp in the broader forestry industry, rural communities and the wider Nova Scotia economy.

There is a lot at stake in this approval process, far more than immediately meets the eye. It seems obvious to most that Northern Pulp operations make an important contribution to the economy. What is not always well understood, however, is how big that impact actually is.

The mill is the anchor for a much wider industry that stretches across the province, providing good jobs in many smaller and rural communities with high unemployment, and where good jobs are scarce. If the mill is allowed to close, the impact will be devastating not only for the workers at Northern Pulp, their families, and communities, but for the entire province.

Earlier this year Unifor commissioned an independent study from Gardner Pinfold Consulting to examine the economic impact of a possible closure of Northern Pulp. Gardner Pinfold is recognized as one of Canada's leading firms in terms of its analytical capabilities and experience related to the economics of natural resource development and management.

The purpose of the study was to examine the broad economic impact and contribution the operations of Northern Pulp provides within the Pictou County region, and across the province of Nova Scotia. The study not only examined the impact of the mill as on ongoing business, but also examined forestry sector dependence on Northern Pulp through analysis of the economic impacts under a scenario of a potential mill closure, focusing particularly on the impacts upon sawmills that are highly dependent on the mill.

A close look at the community level was also made through an analysis of the impacts of the mill, and related industries, in five of the most affected counties. Through rigorous and independent economic analysis, combined with detailed interviews with representatives from 13 sawmills, forestry harvesters and related suppliers, the study found that:

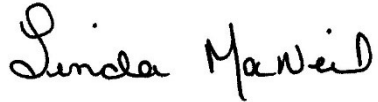
- Northern Pulp is a key player in rural Nova Scotia, creating a significant number of well-paying jobs in typically high-unemployment areas;
- Its unique partnerships with sawmills, forestry contractors and private woodlot owners are critical to its success, and to the rural economy;
- Owing to the inter-connected dependence of the forestry sector on the mill, a closure of the mill would result in the closure of several sawmills and forest harvesting businesses;
- Northern Pulp spends \$279 million annually, with most spent in Nova Scotia;
- A supply chain of 1,379 companies support the mill operation;
- About 2,679 full-time equivalent jobs are supported by the mill;
- Workers throughout the economy gain \$128 million annually worth of income;
- Approximately \$38.4 million in tax revenues is generated annually to the provincial and federal governments; and
- A closure of the mill would remove all of these spending, employment, income and tax revenue benefits from the economy.

An important choice for the future

Canada is a nation rich in natural resources. With this wealth comes great opportunities, but also great responsibilities. We already have among the strongest environmental protections in the world, and should be proud of our record. We also need to understand that a strong economy that provides good jobs, and opportunities for economic development, can go hand in hand with sustainable development that respects First Nations' rights.

Forestry is one of the most sustainable industries we have, with prospects for a bright future, but only if we make the right choices. We have one of those choices in front of us now. We strongly believe that approval of the Northern Pulp Replacement Effluent Treatment Facility Project is the right choice for our members, the broader forestry sector, all stakeholders and rights holders, and the province of Nova Scotia.

Sincerely,

A handwritten signature in black ink that reads "Linda MacNeil". The signature is written in a cursive, flowing style.

Linda MacNeil
Atlantic Director

BM:LM:lmc/cope-343