

Dear Premier Stephen McNeil and Minister for the Environment Gordon Wilson,

I am writing in relation to Northern Pulp's Focus Report for their Replacement Effluent Treatment Facility project.

My name is John Laundon. I currently live in Braeshore (next to Pictou Lodge) – less than 10 km from the proposed pipe location. Because of this I hope my intimate familiarity of the impacted environment will serve as an asset in making your decision.

It All Started With a Busted Pipe:

50 years of environmental racism aside and numerous other pollution infractions, it was a busted pipe in 2014 that launched the recent Boat Harbour timeline and brought us to this current state. The solution, in effect, is to move upwards of 85 million liters of hot effluent per day across Pictou Harbour, over the town of Pictou's watershed to finally reside a shallow estuary called Caribou -- all less than 5km from a national campground, public beach, Pictou Lodge (a premier destination for weddings/ events) and, (as you know) one of the most lucrative fishing grounds in the Maritimes.

When we said that this was a dangerous idea because this effects a multi-billion dollar fishing industry, the response from the Mill was "No Pipe. No Mill". When we said we were concerned because when this pipe breaks it's also : NS tax payers, PLFN, property owners, tourism businesses and everybody else that must deal with the ramifications – not Northern Pulp. And once again NP's answer to this dilemma was "No Pipe. No Mill".

NP had over five years to find a solution. But the only solution they settled on was basically to keep doing the same thing. And why not? They have zero risk if the pipe fails. So instead of finding a new product line that could support a closed loop system, we are instead going to continue with a dated environmental disaster all so that NP can make toilet paper for Asia. That's the best we can do in 2019?

Back to the pipe. Why I am worried:

1) In NP's focus report response, they state that the effluent has been going into the Northumberland Strait for over 50 years. The effluent dilution model on page 95 (figure 4.2-6) shows in a one-month simulation from 2016 that what leaves Boat Harbour hugs the coast line and backs up into Pictou Harbour. It gives no indication that the flow of effluent that leaves Boat Harbour goes very far into the Strait. That is a far cry from NP's present plan to pump their effluent directly into the Northumberland Strait. NP also talks about the effluent that leaves the diffusers reaching back ground levels within 20 meters. Even using NP's metric of 62,000 cubic meters (62 million liters) a day, that would mean that over 40 cubic meters of effluent would be pumped into that 20 meter range every single minute, 60 minutes an hour, 24 hours a day, 365 days a year. The only way I can see that small 20 meter box of effluent consistently reaching background levels with such a low rate of outflow of water in the Northumberland Strait thanks to tidal conditions that basically moves the water one way for six hours and then back for another six hours is if the effluent becomes the background. "Treated effluent" is what comes out of Boat Harbour now. According to what a Northern Pulp engineer said to NSE that was accessed by lawyer Jamie Simpson through a FOIPOP, the effluent coming from Boat Harbour now is better than what will be coming out of the new proposed facility. The flow charts in NP's response to the focus report (page 95 of focus report) that shows the concentration of effluent seems to mimic the charts on where you cannot eat mussels due to health concerns over Leukemia. "Treated Effluent" is effluent

2) Sending the total suspended solids - which are wood fibers that will NOT break down in the ocean EVER - will create an enormous insoluble blob and turn an already fragile ecosystem into a completely anoxic dead zone. This-- within 4 km of a public beach.

3) In 2018, there was another pipe leak. William Palmer and his wife were the ones who discovered the leak (Google it) . No one will give answers on how bad it was because it's "still under investigation". How can NP build a much more complicated pipe system without knowing the cause of the most recent leak?

4) Most of Caribou Harbor is only about 5ft deep. This is especially obvious when you ride in on the PEI Ferry. You can see the wake breaking within a meter or two of the boat. Because it's so shallow, and the nature of the incoming tides, massive ice structures develop all winter long that hammer the coast line. How confident are we that this pipe can withstand this abuse not to mention the vulnerable diffusers? And if/when the pipe breaks, how will they fix it in the dead of winter when the entire harbor is socked in under the ice? Look again at page 20 the focus report . It says the Marine Geotechnical survey work was done in the summer. It also states that ice scour must be considered. Why wasn't the marine work done in the winter. Again – they had five years.

In summary, if NP is actually serious about his proposal, then we need a robust Federal Assessment especially when considering that other provinces are also jeopardized by this pipe. We also need to address the conflict of interest Nova Scotia finds itself thanks to the Indemnity agreements that leave it liable to pay NP for lost profits.

It all started with a broken pipe. And that is where it will end. Caribou Harbor will be a dead zone. The fishing industry and its reputation will be ruined. Caribou National Park will be empty. Why

would anybody want to go to Pictou Lodge? Homeowners will be stuck in a toxic mess. Nova Scotia tax payers will be looking at another multimillion dollar clean-up... But don't worry, Northern Pulp will be just fine.

Please, stop this cycle and let Pictou County grow into a new future.

Thank you,

John Laundon