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March 6, 2019

Environmental Assessment Branch
Nova Scotia Government, Environment Department
[Submitted online at: <https://www.novascotia.ca/nse/ea>]
P.O. Box 442
Halifax, NS, B3J 2P8

Re: Northern Pulp Replacement Effluent Treatment Facility Project

Greetings,

Unifor proudly represents 240 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.

Northern Pulp has proposed a world-class multi-million dollar investment to fully meet new, more stringent, environmental standards. Nova Scotia, along with the rest of Canada, has among the highest global standards for environmental stewardship in the forestry sector. With this proposed investment, Northern Pulp will be on the leading edge of environmental responsibility and stewardship in the industry. We are writing today to encourage a rapid conditional environmental assessment approval for this project.

Northern Pulp's proposed new effluent treatment facility incorporates the AnoxKaldnes BAS biological treatment process purchased from Veolia Water Technologies, one of the world's leading firms in this field. With more than €2billion in annual revenue and 130 business units around the world, Veolia Water Technologies operates with over 9,000 employees; more than 60% of whom are researchers, engineers and project managers. Moreover, the Water Technologies division is part of the much larger France-based Veolia Group, with €25 billion in annual revenue and 169,000 employees around the world.

We are confident that with appropriate government oversight, a partnership between two global industry leaders, Paper Excellence (Northern Pulp's parent company), and Veolia, is fully capable of rigorously implementing proven technology that will meet all required

environmental standards for this project. These two successful global leaders in their fields rely on fully addressing their environmental responsibilities.

Beyond the essential matter of this project meeting the technical requirements for effluent treatment, we would also like to draw your attention to the broader implications of this decision-making process. 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 we would like to bring forward a fuller understanding of the vital economic role played by Northern Pulp in the community, and the wider Nova Scotia economy.

A failure to provide approval for this project puts at serious risk the very future of the mill, with far-reaching implications for the entire inter-connected Nova Scotia forestry sector. Beyond the direct operations of the mill, the wider economic impact of Northern Pulp is best understood through the role it plays in sustaining the province's 93 sawmills (responsible for 2,000 direct jobs), and the broader woodland operations held by the more than 30,000 forest landowners (responsible for a further 1,300 direct jobs).

Simply put, each element of Nova Scotia's forestry sector relies on the others. The province's woodland operations supply logs to sawmills for processing into lumber and other wood products, with the leftover woodchips then sent to Northern Pulp as raw material. The top eleven sawmills in Nova Scotia, which account for 96% of the lumber produced here, all have ties to Northern Pulp – more than 90% of sawmill woodchips in the province end up there.

Beyond providing logs to the sawmills, the province's woodland operations also rely on Northern Pulp as a result of their use of selective harvesting. This best-practice approach involves selectively removing smaller trees to allow others to grow, creating a healthier forest and minimizing the overall environmental impact. These pruned trees are sent to Northern Pulp, which takes 35%-40% of the pulpwood from the provincial market.

Without Northern Pulp as the end market for sawmills and woodland operations, the entire inter-connected forestry sector is at risk. Like many businesses, sawmill and woodland margins are slim, and the removal of a key source of revenue can easily push the operation over the tipping point, resulting in a failure of the whole business. Given the geography of the industry, it is simply uneconomic to transport these unprocessed heavy commodities long distances to pulp mills in other provinces, or the United States.

It is no surprise that an independent economic assessment of Northern Pulp conducted in 2015 found far-reaching impacts. The key findings of that study showed the operations responsible for:

- 339 direct jobs
- 5 spin-off jobs for each direct job
- 2,043 combined direct and spin-off jobs
- Over \$100 million in labour income
- \$315 million in annual spending and investment
- 1,300 companies in the supply chain affected
- 1 in 12 jobs in Pictou County

It is essential to keep in mind that these are good-paying jobs at risk, the kind of jobs which remain scarce in many rural and smaller communities. A recent analysis by the Forest Products Association of Canada highlighted the vulnerable nature of many forest-dependent communities, finding more than 600 communities across Canada, including several in Nova Scotia, where more than half of all household income comes from forestry jobs. The loss of good jobs in these dependent communities is even more devastating than in larger communities with more diverse local economies.

Nova Scotia's forestry sector is an essential ingredient in our economy, delivering a \$2.1 billion annual economic impact, 11,500 direct and indirect jobs, is the second-largest source of employment among good-producing sectors, and the province's third-largest goods exporter. Around the world, forestry is increasingly recognized as a renewable green industry with the potential for a strong future as part of a sustainable economy.

The *Environment Act* clearly articulates the link between sustainable development and long-term economic prosperity. We believe that it is not only possible to make decisions that deliver both strong environmental standards, and good jobs, but that it is our responsibility.

Sincerely,



Lana Payne
Atlantic Director, Unifor

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