

# Comment Index

## Waste Oil Recycling and Water Treatment Facility

January 27, 2023

### Government

Number	Source	Date Received
1	Department of Fisheries and Oceans	29-Nov-22
2	Nova Scotia Environment and Climate Change - ICE Division	23-Dec-22
3	Nova Scotia Environment and Climate Change - Water Resources Management Unit	5-Jan-23
4	Nova Scotia Environment and Climate Change - Climate Change Unit	6-Jan-23
5	Nova Scotia Environment and Climate Change - Resource Management Unit	6-Jan-23
6	Nova Scotia Environment and Climate Change - Water Resources Management Unit	6-Jan-23
7	Nova Scotia Fisheries and Aquaculture	13-Jan-23
8	Environment Canada and Climate Change	17-Jan-23

### Mi'Kmaq of Nova Scotia

Number	Source	Date Received
	None	

### Public

Number	Source	Date Received
1	Native Council of Nova Scotia	6-Jan-23

**From:** [Smith, Colleen A](#)  
**To:** [Quinn, Candace M](#)  
**Subject:** Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review  
**Date:** November 29, 2022 5:10:55 PM

---

**\*\* EXTERNAL EMAIL / COURRIEL EXTERNE \*\***

**Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien**

Hello Candace,

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request to review the Additional Information Addendum EA Review for the proposed Envirosoil Limited- Waste Oil Recycling and Water Treatment Facility – Dartmouth, Nova Scotia Project on November 22, 2022 and we have no further comments to provide NSECC at this time.

Thank you,

**Colleen Smith**

(her/she | elle/son)

A/Section Head Marine Regulatory Reviews Unit, Ecosystems Management  
Fisheries and Oceans Canada | Government of Canada  
[Colleen.Smith@dfo-mpo.gc.ca](mailto:Colleen.Smith@dfo-mpo.gc.ca) | 902-293-7834

Biologiste principal développement côtier, Gestion des Ecosystemes  
Pêches et Océans Canada | Gouvernement du Canada  
[Colleen.Smith@dfo-mpo.gc.ca](mailto:Colleen.Smith@dfo-mpo.gc.ca) | 902-293-7834

Date: December 23, 2022

To: Candace Quinn, Environmental Assessment Officer  
Environmental Assessment Review, Nova Scotia Environment and Climate Change

From: Nova Scotia Environment and Climate Change Inspection, Enforcement and Compliance Central Region

Subject: EA Registration – Envirosoil 2nd Addendum - Waste Oil Recycling and Wastewater Treatment Facility 750 Pleasant Street, Dartmouth, N.S.

---

**Scope of review:**

This review focuses on the following mandate: Requirements for further approvals under Part V of The Environment Act

**Technical Comments:**

The document shows the discharge point as an above water line 6” pipe which would discharge effluent onto the shoreline’s armor stone to flow down to the harbor. This approach seems allow potential contact between humans and wildlife to undiluted effluent and could create sub-optimal dilution by discharging to the shallowest area (i.e. at shore). The applicant should consider alternate methods of discharge which eliminate the risk of direct contact to undiluted effluent for humans and wildlife and maximize dilution.

During the commissioning phases, the addendum states for all phases that: “all analytical data will be analyzed for compliance to the discharge criteria.” However, it is unspecified if the analysis will occur prior to discharge or what steps will be followed if the treated effluent does not meet the discharge criteria. The Department would expect clarification on these points prior to the issuance of the subsequent approvals pursuant to Part V of the Environment Act.

Pre-acceptance procedure should determine which types of shipments will always require some form of laboratory analysis. I agree with the document that full lab testing is not feasible for all types of shipments, however a consistent procedure should be in place to determine when waste characterization by lab analysis is or is not required. Further, parameters which fall outside known “treatable” ranges as demonstrated during the commissioning phase should be considered as “off-spec” and not be accepted to the site. Expanding the treatable parameters/parameter ranges in the future may require further testing and acceptance by the Department.

If the project is recommended to proceed, Approval(s) pursuant to Part V of the Environment Act will be required prior to the commencement of construction and operation. Approval(s) are required in accordance with the Activities Designation Regulations under the following sections:

10(1) (aa) a waste dangerous goods facility, if the facility treats, processes, packages, re-processes, recycles, disposes of or stores dangerous goods listed in Column I of Schedule A that have become waste dangerous goods in quantities that exceed the quantities listed in Column II of Schedule A for those goods;

17(2)(h) a used oil collection facility capable of pickup and storage capacity in excess of 1000 L of used oil including the necessary trucks or storage facilities;

21(2) The treatment or processing of wastewater and wastewater sludges is designated as an activity.

An application for approval under Part V of the Act, must include site plans and engineered drawings detailing the containment features and environmental controls for all tankage and piping. These plans must demonstrate consistency with The Petroleum Management Regulations, and the Nova Scotia Construction, Installation and Operation Standards for Petroleum Storage Tanks Systems. It is recommended that waste oil and wastewater handling systems comply with Regulations and Standard.

Further, design and specifications stamped by a Professional Engineer of all environmental control systems proposed for the facility must be included with the application. This should include, but not be limited to, storage tank systems, secondary containment, the DAF/oil/water separators, air emission controls, wastewater treatment and surface water treatment systems.

The company must prepare Standard Operating Procedures for the maintenance and operation of the facility including procedures for monitoring, process control, internal/external lab analysis to ensure that mishaps are prevented, that source contaminant loading does not exceed the capabilities of the treatment systems and that compliance is maintained with liquid effluent discharge limits.

A contingency plan which follows the Nova Scotia Contingency Planning Guidelines is required for this type of facility.

A storage layout for the management of dangerous and waste dangerous goods should be included with all applicable applications for Part V Approvals. Substance characterization would include, but not be limited to, all tankage liquids, treatment reagents and sludges.

Finally, the Activity Designation Regulation require that financial security be posted with the department in the amount necessary to cover the disposal cost of dangerous goods and waste dangerous goods expected to be on site at any given time.

**Summary of Recommendations: (provide in non-technical language)**

Further submissions will be required to obtain required approvals under Part V of the Environment Act as detailed in the technical section above. These could require modifications to the planned commissioning process and operating procedures.

Further mitigations regarding the effluent discharge point should be considered.

Date: December 5<sup>th</sup>, 2023

To: Candace Quinn, Environmental Assessment Officer

From: Surface Water Quantity staff, Water Resources Management Unit;  
Reviewed by Elizabeth Kennedy, Director, Sustainability and Applied Science  
Division

Subject: **Envirosoil Waste Oil Recycling and Water Treatment Project – Second  
Additional Information Addendum EA Review**

---

**Scope of review:**

This review focuses on the following mandate:

- Surface water quantity
- Potential adverse effects and proposed mitigations with respect to surface water quantity

**Comments:**

This second EA Addendum provided updated information on surface water management and erosion and sediment control as recommended in my previous review to the original Environment Assessment Registration Document (EARD) and the first EA Addendum.

**Recommendations:**

It is recommended to include the details of surface water management and erosion and sediment control (including all associated drawings, and any future additions/revisions) to support the industrial approval application, if the EA is approved.



Date: January 6, 2023

To: Candace Quinn, Environmental Assessment Officer

From: Climate Services Specialist, Climate Change Division; Manager: Satya Ramen

Subject: Envirosoil Waste Oil Recycling and Water Treatment Facility – ADDITIONAL INFORMATION ADDENDUM of November 21, 2022

---

**Scope of review:**

This review focuses on the following mandate: Climate Change Adaptation

---

**Technical Comments:**

*1.4: Project Description Updates and Additional Studies Undertaken*

*It is highlighted that no installation of infrastructure is being proposed below the ordinary high water mark (OHWM), and impacts to fish and fish habitat are not anticipated from either construction or operations, including from the discharge of treated effluent from the facility.*

Suggest noting whether projected sea level rise at this location would result in any installed infrastructure becoming located below the future OHWM, and if so, whether that would result in any impacts to fish or fish habitat in the future.

**Guidance for Reviewers – Environmental Assessments**  
Environmental Assessment Branch, Environment and Climate Change

---

**Summary of Recommendations: (provide in non-technical language)**

Note whether projected relative sea level rise has any impact on findings.



Date: 5 January 2023

To: Candace Quinn, Environmental Assessment Officer

From: Resource Management Unit, Sustainability and Applied Science Division

Subject: Envirosoil Waste Oil Recycling and Water Treatment Facility, Halifax County, NS

---

**Scope of review:**

This review focuses on the following mandate: dangerous goods and waste  
dangerous goods

**Technical Comments:**

The addendum submitted in November 2022 has expanded the amount of information on the types of wastes proposed to be accepted at the facility and clarified the proposed treatment system and process flows. There remain some significant gaps that may affect the acceptance of proposed wastes at the facility and the proponent's ability to process these materials without undue risk to the facility and potential emissions.

The proponent proposes to accept a broad range of materials with a focus on oily wastewaters, but has included both acidic and alkaline wastes. These materials are generally incompatible, especially if concentrated, and will react rapidly and perhaps violently if brought into contact with each other. These reactions may generate gases, heat and, depending on concentrations, combustion reactions. If piping or storage equipment is not adequately sized or vented, gases generated during these reactions may lead to containment failure.

The proponent references that materials will be off-loaded into bulk tanks but appears to indicate that these will be common service. It is established in the Dangerous Goods Management Regulations, as well as accepted industry practice, that incompatible materials cannot be stored together. If the proposed facility is to handle organic, acidic and caustic materials, these waste streams must be handled and stored through separate piping, pumping and storage tank systems, including any containment systems. If common infrastructure is to be used, the system should be cleaned and purged between handling incompatible materials.

The proponent also does not clearly specify that their proposed storage and transfer equipment is compatible with all of the waste streams that they propose to accept. Highly concentrated acids and caustics may damage regular carbon steels, pump seals and other equipment so it is important that specialized, specific equipment be utilized if these substances are proposed to be handled to reduce the risk of corrosion, reaction or failure.

The proponent also has noted on their proposed acceptance criteria that they can accept any material that has been previously accepted at another facility in Nova Scotia. However, the proponent does not compare their proposed treatment system to that employed at other approved facilities so there is no evidence that the capabilities are the same. It is also unclear if wastes accepted at other facilities are always fully treated there or if they may be bulked for trans-shipment to a final treatment or disposal facility at a location outside Nova Scotia. Finally, it is unclear if the effluent discharged from these facilities goes into further municipal treatment or other, potentially less sensitive receiving environments than where this proponent plans to discharge.

**Summary of Recommendations: (provide in non-technical language)**

The proponent has proposed accepting a broad range of oily wastes, waters with dissolved chemicals and metals and acidic and caustic waste streams. In my opinion, this range is currently too broad for the equipment and systems that the proponent has proposed to install and operate, which creates an unacceptable risk of incident or release to the environment. The acceptance criteria should be narrowed to waste oils, oily bilge water and weakly acidic and caustic wastewaters and the storage and handling requirements should be updated to ensure that incompatible materials are not brought into accidental contact. Any proposed acidic or caustic streams should also be tested at the truck before acceptance to ensure that inadvertent mixing does not occur in receiving systems.

See table next page.

<b>Risk Assessment</b>		
<b>Identify Gap/Risk</b>	<b>Can it be addressed in another permit/approval or with a T&amp;C?</b>	<b>Define/provide detail</b>
Incompatible materials – lead to emissions to air or water from combustion/explosion and/or damage to equipment	Dangerous Goods Management Regulations, Industrial Approval	<p>T&amp;Cs draft language:</p> <p>Meet requirements of any existing legislation and regulations, including Dangerous Goods Management Regulations and specifically regarding storage of incompatible materials</p> <p>If the proposed facility is to handle organic, acidic and caustic materials, these waste streams must be handled and stored through separate piping, pumping and storage tank systems, including any containment systems. Or, if common infrastructure is to be used, the system should be cleaned and purged between handling incompatible materials.</p> <p>As part of IA application, proponent to provide details of how incompatible materials will be handled as part of IA application.</p>
Incompatibility of materials with equipment and treatment methods – leading to emissions to air or water from equipment/treatment failure	Industrial Approval	<p>T&amp;Cs: Provide evidence that equipment and infrastructure is compatible with materials to be accepted, and that the treatment system is effective for those materials. This includes appropriate sampling programs to confirm composition of materials prior to acceptance at facility and post-treatment.</p> <p>As part of IA application, proponent to provide details of materials to be accepted and compatibility with equipment/infrastructure and treatment. Proponent to provide sampling program.</p> <p>(Water Branch may have comments re: discharge criteria)</p>

Date: January 6, 2023

To: Candace Quinn, Environmental Assessment Officer

From: Surface Water and Wastewater staff, Water Branch, Sustainability and Applied Science Division; **Sign-off by Manager/Director**

Subject: Envirosoil Waste Oil Recycling and Water Treatment Facility, Additional Information Addendum, Halifax County, Nova Scotia

---

**Scope of review:**

Envirosoil Ltd. provided a submission to Nova Scotia Environment and Climate Change (NSECC) dated November 21, 2022, titled the *Waste Oil Recycling and Water Treatment Facility Environmental Assessment Registration Document – Additional Information Addendum*. The submission was issued in response to the additional information requested by the Minister of Environment and Climate Change, February 18, 2022.

This review from surface water and wastewater staff of NSECC's Water Branch focuses on the department's surface water quality and wastewater management mandates.

**Technical Comments:**

Nature And Scope of Confirmatory Waste and Effluent Sampling

- The proponent provided a pre-acceptance procedure for waste oil and wastewater products to confirm the source, nature of the waste material, and any additional testing requirements.
- The addendum clearly articulated criteria to determine how proposed waste materials meet or do not meet facility acceptance requirements.
- The addendum identified specific contaminants that the facility could treat and would be approved for receipt in incoming wastewater.
- The report identified equipment and laboratory tests (in-house and 3<sup>rd</sup> party) that would be used to confirm incoming waste loads.
- Wastewaters classified as Waste Dangerous Goods will not be accepted for treatment at the facility. Specific substances that may be so designated, based on their dissolved concentrations, were identified.
- The proposed effluent testing, sampling, and associated laboratory auditing programs, including QA/QC, are robust and designed in accordance with recognized industry standards.

- The effluent testing / sampling regime will be subject to a rigorous five-phase commissioning program.
- The toxicity testing regime for treated water samples relies in part on “Microtox” technology, a non-specific but sensitive method. Microtox was proposed to test toxicity for four material types: metals, petroleum hydrocarbons (PHCs), volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs). The addendum did not present information demonstrating the suitability of this technology for testing PHCs, VOCs, or PAHs.

### Treatment System Capabilities for all Applicable Contaminants and Compounds

- The addendum indicated that all waste materials would be subject to the same (advanced level) treatment system.
- The proponent indicated that all treated wastewaters would be discharged in batch mode for all commissioning phases and the first year of operations.
- The proponent indicated that, following successful completion of the final commissioning phase and after one year of operations, the owner may choose to treat select types of wastewaters in a continuous discharge mode versus batch mode.
- The addendum clearly identified wastewaters that the proponent considers suitable for continuous discharge.
- For each treatment technology proposed, the proponent provided design capabilities, operating parameters, treatment equipment processes, manufacturer specifications, method selection rationale, and operational considerations.
- The facility is intended to produce a maximum daily volume of 100 m<sup>3</sup> of wastewater, with estimated average daily volumes anticipated to be less – between 40-60% of the daily maximum.

### Facility Commissioning and Operations

- The proponent has identified a progressive five-phase commissioning program.
- Used water generated during the commissioning phases will be stored in a dirty water tank and treated through the system.
- The addendum indicated that waste residuals generated during maintenance and cleaning activities will be either treated onsite or offsite at a licenced facility, depending on the waste characteristics.
- The addendum identified and described a preventative maintenance and inspection program that serves to ensure 1) process and equipment functionality and 2) that effluent quality is maintained within required limits.

## Assessment of the Potential Effects of the Project on the Marine Environment

- A benthic habitat study was completed to provide baseline information and to support the identification of potential impacts to the marine environment.
- Effluent discharge is located above high-water level and within Armour stone shoreline. Proposed location would spill effluent directly onto existing sand beach at low tide.
  - Atlantic Canada Wastewater Systems Guidelines (2022) recommend submerged outfall where possible.
  - Submerged outfall usually provides better mixing and removes effluent from possible human and/or animal contact.
  - Submerged outfall may require approval from federal regulators and possibly Halifax Harbour Authority.
- There is mention of the facility possibly accepting cruise ship greywater and blackwater. Assuming there would be a significant quantity aboard a cruise ship and assuming that this effluent is similar to municipal wastewater, this waste stream may not be appropriate for treatment at the proposed facility.
- Mixing zone calculations are based on 100 m radius from effluent discharge. Justification is provided indicating that this radius will contain mixing zone entirely within subject property water frontage. Google maps measurement indicates water frontage at approximately 100 m total. Therefore, if effluent discharge is near centre of water frontage, maximum radius should be 50 m to avoid impacts to neighbouring properties.
  - CCME technical supplements recommend mixing zones should be as small as possible.
  - 100 m maximum is listed in 2006 Atlantic Canada Wastewater Guidelines Manual. New version issued in 2022 does not include this maximum radius. Instead, 2022 version defaults to CCME technical supplements.
- Background receiving water quality is based on two samples. More sampling over a longer period is required to define levels of substances to be applied as background.
- Modelling did not account for tidal influence. Reasons for this are not clearly understood. We would expect the effluent plume to extend towards the ocean on ebbing tide and in land on rising tide.
- Physical/chemical/pathogenic approach was used to establish environmental quality objectives (EQOs). This approach is clearly defined within CCME technical supplements. Generally, the approach presented appears to match CCME technical supplement.
- Whole Effluent Toxicity (WET) is another clearly defined approach within CCME technical supplements which may be used in combination with the above to provide greater assurance against toxic effects. Calculations based on this approach were not included in the receiving water study. Given the broad range of substances to be

treated at this facility, it is recommended that WET calculations be considered in addition to physical/chemical/pathogenic approach. It is understood that these measurements/calculations are not possible prior to commissioning.

- Acutely toxic conditions within the mixing zone are reported to be acceptable if due to un-ionized ammonia. Ammonia is commonly associated with acute toxicity in municipal wastewater effluents and therefore has special allowances. Those allowances may not be applicable to industrial wastewater discharges. It is recommended that an effluent discharge objective be established for ammonia.

### Surface Water Management

Envirosoil provided additional information regarding its surface water management plans in response to reviewer questions.

- The addendum indicated, in most instances, that all surface water would be managed using on-site infrastructure. However, in Appendix D, page 3, Stormwater Collection and Management, the proponent indicated that contents of a 15,000L oil-water separator (OWS) will be released to the Halifax Water municipal stormwater sewer. This proposed discharge to the municipal stormwater system contradicts all other information within the addendum regarding on-site stormwater management and discharge location.

<b>Summary of Gaps / Risks</b>			
<b>Identify Gap/Risk</b>	<b>Can it be addressed in another permit/ approval or with a T/C?</b>	<b>Define / provide detail</b>	<b>Risk of this approach</b>
Microtox test may not be suitable for testing PHCs, VOCs, or PAHs.	Yes, Industrial Approval	<ol style="list-style-type: none"> <li>1. Provide evidence of test suitability for these materials.</li> <li>2. Alternatively, NSECC may require supplementation of Microtox testing with traditional whole effluent toxicity testing using suitable standard aquatic marine species (three-spine stickleback or <i>Acartia tonsa</i>) during</li> </ol>	If technology is suitable, then traditional toxicity testing will provide confidence in acceptable discharge quality until Microtox accepted by department. If technology is unsuitable, traditional toxicity testing will provide reliable results in its absence, and proponent can revert to alternative testing methods.

		commissioning period and first year of operations post-commissioning until accepted by Department.	
Proposed effluent discharge is above high-water level which will transmit effluent across intertidal area and beach.	Adjustment to related calculations can be validated at IA stage	Effluent discharges (outfalls) are typically submerged. Recommend changing outfall location so that it is submerged.	As is, risk of direct effluent contact with humans and/or animals. Also risk of negative public perception with effluent spilling onto beach.
Receive sanitary wastewater from cruise ships	Approve or deny at IA stage	Only mentioned in receiving water study section	Proponent may not be permitted to treat this type of waste.
Mixing zone potentially extends beyond facility property boundary	Adjustment to related calculations can be validated at IA stage	Reported protection of adjacent properties may not be true based on assumptions presented	Recalculation will lower proposed Effluent Discharge Objective (EDO).
Two data points used to establish background conditions.	Yes, Industrial Approval	Insufficient data to establish background concentrations of Substances of Potential Concern	Additional data collected after operations begin may change environmental quality objectives and related effluent discharge objectives.
Unvalidated assumptions in mixing zone model.	Yes, Industrial Approval	Mixing zone model (Cormix) applied several assumptions in input data, including: <ol style="list-style-type: none"> <li>1. Effluent density (1015 mg/L)</li> <li>2. Ambient density (1022 mg/L)</li> <li>3. Consistent effluent discharge throughout 24h period.</li> </ol>	These assumptions were not justified or validated. Different values & assumptions could yield different effluent discharge objectives, which may be more protective of the environment. Assumptions should be justified. If assumptions change, model should be re-run and EDOs recalculated.



Tidal influence not accounted for	Adjustment to related calculations can be validated at IA stage	Reason for existing assumption is not well described	Expect tidal influence to increase assimilative capacity of receiving water
Whole effluent toxicity (WET methodology as per CCME) was excluded from receiving water study	Yes, Industrial Approval	Imposes toxicological EQOs on effluent discharge not currently accounted for in receiving water study	WET restrictions reduce the possibility of toxic discharges due to contaminants which were not predicted to exist in effluent
No effluent discharge objective for ammonia	Set discharge limit in industrial approval	Ammonia is known to be commonly associated with acute toxicity in wastewater	Discharge limit reduces the possibility of toxic effect due to ammonia.
Dilution ratio incorrectly applied to mercury	Yes – Industrial Approval	Mercury is not eligible for dilution in mixing zones according to CCME guidance, because it is persistent, bioaccumulative, and inherently toxic. Discharge limits for mercury must be set at end-of-pipe. EDOs must be recalculated accordingly.	The facility may not be able to meet revised mercury discharge limits recalculated due to this restriction.
Uncertain plans for disposal of materials in the oil-water separator (OWS)	Yes – Industrial Approval	Plan identifies two contradictory disposal plans: 1) to municipal stormwater system, and 2) discharge to marine environment. Proponent to confirm the planned disposal plans for materials from OWS and verify that, if on-site, treatment, monitoring, and management are aligned with these plans.	An uncertain disposal destination for OWS materials may result in inadequate system capacity or treatment before disposal. Providing certainty will enable alignment of all associated surface water management functions.

## Summary of Recommendations:

1. Provide evidence indicating suitability of Microtox testing methodology for PHCs, VOCs, and PAHs.
2. Consider requiring, as a condition of Industrial Approval, that whole effluent testing based on suitable marine aquatic test species be performed in addition to Microtox testing. Additional testing to be required during commissioning phases and throughout first year of operations post-commissioning, to satisfy Department concerns that Microtox testing adequately protects organisms in the receiving environment.
3. Redirect effluent discharge to a submerged location. Revise mixing study according to changed conditions.
4. Existing treatment technology may not adequately treat sanitary wastewater from cruise ships. Further evaluation is required to determine this. If this waste stream is not appropriate for the treatment technology, it should be excluded from the list of acceptable inputs.
5. Adjust mixing zone size and re-run mixing zone calculations for EDOs accordingly calculate mixing zone.
6. Collect additional measurements for substances of potential concern. Revise discharge limits accordingly, if required.
7. Justify / validate assumptions regarding effluent density, ambient density, and effluent discharge timing made in the mixing model. Rerun model and recalculate EDOs as needed if assumptions change.
8. Revise mixing model to account for tidal influence, or justify existing discharge assumptions (input parameters) built into Cormix model
9. Apply Whole Effluent Toxicity methodology to establish appropriate limitations during facility commissioning.
10. Establish a discharge limit for un-ionized ammonia in industrial approval.
11. Recalculate mercury EDO by applying a dilution value of 1.
12. Confirm the planned disposal plans for materials from OWS and verify that, if on-site, treatment, monitoring, and management are aligned with these plans.

**From:** [Eyitayo-Oyesode, Oladiwura](#)  
**To:** [Quinn, Candace M](#); "[fcr\\_tracker@ec.gc.ca](#)"  
**Cc:** [Maswod, Sayeed](#)  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review  
**Date:** January 13, 2023 3:48:41 PM  
**Attachments:** [image001.png](#)

---

Hi Candace,

Thank you so much for your patience. Please see below comments from our Marine division on the additional information addendum. Please let me know if you have any questions. Thanks again.

Best,  
Wura

\*\*\*\*\*

*There is a Harbour Authority Wharf Facility at Southwest cove located near the Envirosoil Facility. Spillage or discharge into the Harbour could cause potential negative impacts to commercial seafood harvesting, active licensed lobster facilities and licensed processing facilities near the Harbour.*

---

**From:** Quinn, Candace M <[Candace.Quinn@novascotia.ca](mailto:Candace.Quinn@novascotia.ca)>  
**Sent:** January 9, 2023 7:47 AM  
**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eyitayo-Oyesode, Oladiwura <[Oladiwura.Eyitayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eyitayo-Oyesode@novascotia.ca)>; '[fcr\\_tracker@ec.gc.ca](mailto:fcr_tracker@ec.gc.ca)'  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Good morning,

This is a reminder that comments on the Envirosoil Waste Oil Recycling and Water Treatment Project additional information addendum were **due on January 7**. If you have no comments, please indicate this in writing. Please provide your comments ASAP to be considered in this environmental assessment.

Many thanks,  
Candace

---

**From:** Quinn, Candace M  
**Sent:** January 3, 2023 9:01 AM  
**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eyitayo-Oyesode, Oladiwura <[Oladiwura.Eyitayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eyitayo-Oyesode@novascotia.ca)>; Miller, Michelle <[Michelle.Miller@novascotia.ca](mailto:Michelle.Miller@novascotia.ca)>; Deacoff, Cameron J <[Cameron.Deacoff@novascotia.ca](mailto:Cameron.Deacoff@novascotia.ca)>; Xie, Jun <[Jun.Xie@novascotia.ca](mailto:Jun.Xie@novascotia.ca)>; Baxter, Brent K <[Brent.Baxter@novascotia.ca](mailto:Brent.Baxter@novascotia.ca)>; Finnigan, Jean-Charles <[Jean-Charles.Finnigan@novascotia.ca](mailto:Jean-Charles.Finnigan@novascotia.ca)>; Peverill, Derrick J <[Derrick.Peverill@novascotia.ca](mailto:Derrick.Peverill@novascotia.ca)>; Tufts, Denis P <[Denis.Tufts@novascotia.ca](mailto:Denis.Tufts@novascotia.ca)>; '[fcr\\_tracker@ec.gc.ca](mailto:fcr_tracker@ec.gc.ca)'  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Good morning,

This is a reminder that if you have not already submitted comments to the EA Branch, comments on the Envirosoil Waste Oil Recycling and Water Treatment Project additional information addendum must be provided by **January 7**, to be considered in this environmental assessment. If you have no comments, please indicate this in writing.

Many thanks,  
Candace

---

**From:** Quinn, Candace M

**Sent:** November 22, 2022 8:26 AM

**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eytayo-Oyesode, Oladiwura <[Oladiwura.Eytayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eytayo-Oyesode@novascotia.ca)>; Miller, Michelle <[Michelle.Miller@novascotia.ca](mailto:Michelle.Miller@novascotia.ca)>; Deacoff, Cameron J <[Cameron.Deacoff@novascotia.ca](mailto:Cameron.Deacoff@novascotia.ca)>; Xie, Jun <[Jun.Xie@novascotia.ca](mailto:Jun.Xie@novascotia.ca)>; Baxter, Brent K <[Brent.Baxter@novascotia.ca](mailto:Brent.Baxter@novascotia.ca)>; Finnigan, Jean-Charles <[Jean-Charles.Finnigan@novascotia.ca](mailto:Jean-Charles.Finnigan@novascotia.ca)>; Peverill, Derrick J <[Derrick.Peverill@novascotia.ca](mailto:Derrick.Peverill@novascotia.ca)>; 'fcr\_tracker@ec.gc.ca'; 'referralsmaritimes@dfo-mpo.gc.ca' <[ReferralsMaritimes@dfo-mpo.gc.ca](mailto:ReferralsMaritimes@dfo-mpo.gc.ca)>

**Subject:** Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Hello everyone,

This is to advise that on November 28, 2022, Envirosoil Limited will register the second **Additional Information Addendum** for the Waste Oil Recycling and Water Treatment Facility for environmental assessment (EA), in accordance with Part IV of the Environment Act. The purpose of the proposed undertaking is to install and operate a facility that will be used for receiving, processing and recycling of waste oil and the treatment of waste waters. Treated water will be discharged to the Halifax Harbour. Collected oil will be sent to approved facilities for reuse. The undertaking is at a commercial/industrial property at 750 Pleasant Street, Dartmouth, Nova Scotia.

**BACKGROUND** - On April 8, 2021, Envirosoil registered the proposed Project for environmental assessment. The Minister determined on May 28, 2021, that additional information regarding facility operation, surface water management, air emissions, odour control and the marine environment was required. On December 21, 2021, Envirosoil registered an Additional Information Addendum. Treated water was proposed to be discharged to the Halifax Harbour, not the Halifax Regional Municipal sanitary sewer system as proposed in the original Registration Document. On February 18, 2022, the Minister determined that a second round of additional information was required. **The Proponent must provide information regarding facility operations and potential impacts of the Project on the marine environment. The EA Branch is requesting comments on the second Additional Information Addendum only.**

-  
The Addendum is available on this FTP site:

URL: <https://dl.dillon.ca>

Username: nseglc

Password: W#\$z!JxzMNUB

Please let me know if you have trouble accessing the document. These documents will also be posted on our website (<https://www.novascotia.ca/nse/ea/projects.asp>) on November 28, 2022.

-

Comments on the Additional Information Addendum must be provided by **January 7, 2023** (in the EA Regulations December 23-January 2 count as one day). **Ensuring a clear, consistent and predictable review of EA projects is key to clarifying and streamlining the EA process. We have developed the attached template to support you, in your role as reviewer, to help achieve this goal, and includes guiding questions to support reviewers in completing the template, requests a summary of comments be provided, and requests sign off by Managers/Directors (for provincial departments) prior to submission of final comments to the EA Branch.** Comments are requested to be provided via e-mail if possible. If there are no comments, please reply indicating so.

On or before January 27, 2023, the Minister of Environment and Climate Change will decide if the project can be granted conditional environmental assessment approval. **Your comments on the Addendum will be published on our EA website on the decision day.**

If you have any questions, please do not hesitate to contact me.

Thanks,



Candace Quinn (She/Her)  
Environmental Assessment Officer  
Policy Division, EA Branch

1903 Barrington Street, Suite 2085  
PO Box 442, Halifax, NS B3J 2P8

☎ (902) 499-2578

✉ [Candace.Quinn@novascotia.ca](mailto:Candace.Quinn@novascotia.ca)

**From:** [Eyitayo-Oyesode, Oladiwura](#)  
**To:** [Quinn, Candace M](#); "[fcr\\_tracker@ec.gc.ca](#)"  
**Cc:** [Maswod, Sayeed](#)  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review  
**Date:** January 13, 2023 3:48:41 PM  
**Attachments:** [image001.png](#)

---

Hi Candace,

Thank you so much for your patience. Please see below comments from our Marine division on the additional information addendum. Please let me know if you have any questions. Thanks again.

Best,  
Wura

\*\*\*\*\*

*There is a Harbour Authority Wharf Facility at Southwest cove located near the Envirosoil Facility. Spillage or discharge into the Harbour could cause potential negative impacts to commercial seafood harvesting, active licensed lobster facilities and licensed processing facilities near the Harbour.*

---

**From:** Quinn, Candace M <[Candace.Quinn@novascotia.ca](mailto:Candace.Quinn@novascotia.ca)>  
**Sent:** January 9, 2023 7:47 AM  
**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eyitayo-Oyesode, Oladiwura <[Oladiwura.Eyitayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eyitayo-Oyesode@novascotia.ca)>; '[fcr\\_tracker@ec.gc.ca](mailto:fcr_tracker@ec.gc.ca)'  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Good morning,

This is a reminder that comments on the Envirosoil Waste Oil Recycling and Water Treatment Project additional information addendum were **due on January 7**. If you have no comments, please indicate this in writing. Please provide your comments ASAP to be considered in this environmental assessment.

Many thanks,  
Candace

---

**From:** Quinn, Candace M  
**Sent:** January 3, 2023 9:01 AM  
**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eyitayo-Oyesode, Oladiwura <[Oladiwura.Eyitayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eyitayo-Oyesode@novascotia.ca)>; Miller, Michelle <[Michelle.Miller@novascotia.ca](mailto:Michelle.Miller@novascotia.ca)>; Deacoff, Cameron J <[Cameron.Deacoff@novascotia.ca](mailto:Cameron.Deacoff@novascotia.ca)>; Xie, Jun <[Jun.Xie@novascotia.ca](mailto:Jun.Xie@novascotia.ca)>; Baxter, Brent K <[Brent.Baxter@novascotia.ca](mailto:Brent.Baxter@novascotia.ca)>; Finnigan, Jean-Charles <[Jean-Charles.Finnigan@novascotia.ca](mailto:Jean-Charles.Finnigan@novascotia.ca)>; Peverill, Derrick J <[Derrick.Peverill@novascotia.ca](mailto:Derrick.Peverill@novascotia.ca)>; Tufts, Denis P <[Denis.Tufts@novascotia.ca](mailto:Denis.Tufts@novascotia.ca)>; '[fcr\\_tracker@ec.gc.ca](mailto:fcr_tracker@ec.gc.ca)'  
**Subject:** RE: Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Good morning,

This is a reminder that if you have not already submitted comments to the EA Branch, comments on the Envirosoil Waste Oil Recycling and Water Treatment Project additional information addendum must be provided by **January 7**, to be considered in this environmental assessment. If you have no comments, please indicate this in writing.

Many thanks,

Candace

---

**From:** Quinn, Candace M

**Sent:** November 22, 2022 8:26 AM

**To:** Maswod, Sayeed <[Sayeed.Maswod@novascotia.ca](mailto:Sayeed.Maswod@novascotia.ca)>; Eytayo-Oyesode, Oladiwura <[Oladiwura.Eytayo-Oyesode@novascotia.ca](mailto:Oladiwura.Eytayo-Oyesode@novascotia.ca)>; Miller, Michelle <[Michelle.Miller@novascotia.ca](mailto:Michelle.Miller@novascotia.ca)>; Deacoff, Cameron J <[Cameron.Deacoff@novascotia.ca](mailto:Cameron.Deacoff@novascotia.ca)>; Xie, Jun <[Jun.Xie@novascotia.ca](mailto:Jun.Xie@novascotia.ca)>; Baxter, Brent K <[Brent.Baxter@novascotia.ca](mailto:Brent.Baxter@novascotia.ca)>; Finnigan, Jean-Charles <[Jean-Charles.Finnigan@novascotia.ca](mailto:Jean-Charles.Finnigan@novascotia.ca)>; Peverill, Derrick J <[Derrick.Peverill@novascotia.ca](mailto:Derrick.Peverill@novascotia.ca)>; 'fcr\_tracker@ec.gc.ca'; 'referralsmaritimes@dfo-mpo.gc.ca' <[ReferralsMaritimes@dfo-mpo.gc.ca](mailto:ReferralsMaritimes@dfo-mpo.gc.ca)>

**Subject:** Envirosoil Waste Oil Recycling and Water Treatment Project - Additional Information Addendum EA Review

Hello everyone,

This is to advise that on November 28, 2022, Envirosoil Limited will register the second **Additional Information Addendum** for the Waste Oil Recycling and Water Treatment Facility for environmental assessment (EA), in accordance with Part IV of the Environment Act. The purpose of the proposed undertaking is to install and operate a facility that will be used for receiving, processing and recycling of waste oil and the treatment of waste waters. Treated water will be discharged to the Halifax Harbour. Collected oil will be sent to approved facilities for reuse. The undertaking is at a commercial/industrial property at 750 Pleasant Street, Dartmouth, Nova Scotia.

**BACKGROUND** - On April 8, 2021, Envirosoil registered the proposed Project for environmental assessment. The Minister determined on May 28, 2021, that additional information regarding facility operation, surface water management, air emissions, odour control and the marine environment was required. On December 21, 2021, Envirosoil registered an Additional Information Addendum. Treated water was proposed to be discharged to the Halifax Harbour, not the Halifax Regional Municipal sanitary sewer system as proposed in the original Registration Document. On February 18, 2022, the Minister determined that a second round of additional information was required. **The Proponent must provide information regarding facility operations and potential impacts of the Project on the marine environment. The EA Branch is requesting comments on the second Additional Information Addendum only.**

-  
The Addendum is available on this FTP site:

URL: <https://dl.dillon.ca>

Username: nseglc

Password: W#\$z!JxzMNUB

Please let me know if you have trouble accessing the document. These documents will also be posted on our website (<https://www.novascotia.ca/nse/ea/projects.asp>) on November 28, 2022.

-

Comments on the Additional Information Addendum must be provided by **January 7, 2023** (in the EA Regulations December 23-January 2 count as one day). **Ensuring a clear, consistent and predictable review of EA projects is key to clarifying and streamlining the EA process. We have developed the attached template to support you, in your role as reviewer, to help achieve this goal, and includes guiding questions to support reviewers in completing the template, requests a summary of comments be provided, and requests sign off by Managers/Directors (for provincial departments) prior to submission of final comments to the EA Branch.** Comments are requested to be provided via e-mail if possible. If there are no comments, please reply indicating so.

On or before January 27, 2023, the Minister of Environment and Climate Change will decide if the project can be granted conditional environmental assessment approval. **Your comments on the Addendum will be published on our EA website on the decision day.**

If you have any questions, please do not hesitate to contact me.

Thanks,



Candace Quinn (She/Her)  
Environmental Assessment Officer  
Policy Division, EA Branch

1903 Barrington Street, Suite 2085  
PO Box 442, Halifax, NS B3J 2P8

☎ (902) 499-2578

✉ [Candace.Quinn@novascotia.ca](mailto:Candace.Quinn@novascotia.ca)



# Maritime Aboriginal Peoples Council



The Maritime Regional Aboriginal Leaders  
Intergovernmental Council of Aboriginal Peoples  
Continuing to Reside on Traditional Ancestral Homelands

## Forums

January 7<sup>th</sup>, 2023

- Leaders Congress
- MAPC Commissions/Projects
- MAARS Secretariate
- IKANAWTIKET SARA
- MAPC Administration

MAPC Regional  
Administrative Office  
80 Walker Street, Suite 3  
Truro, Nova Scotia  
B2N 4A7

Tel: 902-895-2982  
Fax: 902-895-3844  
Toll Free: 1-855-858-7240  
Email: [frontdesk@mapcorg.ca](mailto:frontdesk@mapcorg.ca)

Governmental  
APRO Councils

Native Council of  
Nova Scotia  
P.O. Box 1320  
Truro, Nova Scotia  
B2N 5N2

Tel: 902-895-1523  
Fax: 902-895-0024  
Email: [chieflaugustine@ncns.ca](mailto:chieflaugustine@ncns.ca)

New Brunswick Aboriginal  
Peoples Council  
320 St. Mary's Street  
Fredericton, New Brunswick  
E3A 2S4

Tel: 506-458-8422  
Fax: 506-451-6130  
Email: [chief@nbapc.org](mailto:chief@nbapc.org)

Native Council of  
Prince Edward Island  
6 F.J. McAuley Court  
Charlottetown  
Prince Edward Island  
C1A 9M7

Tel: 902-892-5314  
Fax: 902-368-7464  
Email: [chief@ncpei.com](mailto:chief@ncpei.com)

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

## RE: Waste Oil Recycling & Water Treatment Facility

To Whom It May Concern,

On behalf of the Native Council of Nova Scotia (NCNS), the Maritime Aboriginal Aquatic Resources Secretariate (MAARS) is providing comments to the Environmental Assessment Branch of the Nova Scotia Department of Environment and Climate Change regarding the Additional Information Addendum to the Waste Oil Recycling and Water Treatment Facility by Envirosoil Limited. Our comments primarily relate to the matters of odour mitigation and monitoring, invasive species, and emergency preparedness. NCNS provided commentary on May 8<sup>th</sup>, 2021 during which we called attention to a few concerns related to the Environmental Assessment (EA), which were not addressed in the NSECC Additional Information Request. While NCNS did receive a response to our concerns related to odour management, there are still concerns unaddressed as it relates to the monitoring of the odour mitigation measures. Despite the fact that there are a number of mitigative measures in place, and many other aspects of the EA describe monitoring, there is no mention of an odour monitoring plan. Due to the proximity to a residential area, an odour monitoring plan or monitoring program could be developed to ensure that all mitigative measures are remaining effective into the future.

Introductory vectors for aquatic invasive species (AIS) are one concern given that AIS are a potential when dealing with used bilge waters from multiple sources. Within the EA there is no mention of potentials for introductory vessels as it relates to *aquatic* invasive species, despite the mention of mitigation measures for invasive plant species, MAARS is concerned that there is missing information on the potential for AIS introduction through the bilge water release.

Fletcher et al.<sup>1</sup> (2017) confirmed that species movement through bilge water is possible, with the potential highest during short duration voyages. Some mitigation measures proposed include; discharge location restrictions, retention of bilge water for proper disposal, and *treatment of bilge water before discharge*. MAARS requests Envirosoil Limited develop procedures to mitigate introductory vessels for AIS, and provide further information on the mitigation measures that may be in place to prevent these types of events. As well, further details are needed in terms of how the bilge water will be treated in order to prevent these types of introductory vessels.

In order to gather a fuller understanding of the potential impacts of this project, especially as it relates to water quality, fish habitat, and ecosystem integrity, MAARS would like to request a copy of the current Environmental Response and Contingency Plan (ERCP) for review. As well, we are requesting further information on whether these plans have been updated in light of the changes from the originally proposed project, given that there is further potential for harmful impacts to water quality and fish habitat. The previously proposed project involved discharging of water into the Halifax Water system, with the current proposal discharging into the Halifax Harbour, what types of changes are expected as part of these plans to ensure water quality and ecosystem integrity?

We would like to take this opportunity to reiterate that it is important for all proponents of projects to understand that the Off-Reserve Aboriginal Community represented by the NCNS is included within the definition of the word “Indian” of Section 91(24) of the *Constitution Act*, 1982. The Supreme Court of Canada in a landmark decision in *Daniels v. Canada (Indian Affairs and Northern Development)*, 2016 SCC 12, declared that “the exclusive Legislative Authority of the Parliament of Canada extends to all Indian, and Lands reserved for the Indians” and that the “word Indians’ in s.91(24) includes Métis and non-Status Indians”<sup>2</sup>. Since 2004, in multiple decisions passed by the Supreme Court of Canada: *Haida Nation*<sup>3</sup>, *Taku River Tlingit First Nation*<sup>4</sup>, and *Mikisew Cree First Nation*<sup>5</sup>, has established that,

Where accommodation is required in decision making that may adversely affect as yet unproven Aboriginal Rights and title claims, the Crown must balance Aboriginal concerns reasonably with the potential impact of the decision on the asserted right or title and with other societal interests.

Further, both the Government of Nova Scotia and the Government of Canada are aware that the “Made in Nova Scotia Process” and the *Mi’kmaq-Nova Scotia-Canada Consultation Terms of Reference* does not circumvent the Provincial Government’s responsibility to hold consultations with other organizations in Nova Scotia that represent Indigenous Peoples of Nova Scotia. While the proponent may have to engage with the thirteen Mi’kmaq First Nations through the Assembly of Nova Scotia Mi’kmaq Chiefs, represented by the Kwilmu’kw Maw-klusuaqn Negotiation

---

<sup>1</sup> Lauren M. Fletcher et al., “Bilge Water as a Vector for the Spread of Marine Pests: A Morphological, Metabarcoding and Experimental Assessment,” *Biological Invasions* 19, no. 10 (October 2017): 2851–67, <https://doi.org/10.1007/s10530-017-1489-y>.

<sup>2</sup> *Daniels v. Canada (Indian Affairs and Northern Development)*, 2016 SCC 12, [2016] 1 S.C.R. 99

<sup>3</sup> *Haida Nation v. British Columbia (Minister of Forests)*, (2004), 2 S.C.R. 511

<sup>4</sup> *Taku River Tlingit First Nation v. British Columbia (Project Assessment Director)*, (2004), 3 S.C.R. 550

<sup>5</sup> *Mikisew Cree First Nations v. Canada (Minister of Canadian Heritage)*, (2005), 3 S.C.R. 388

Office (KMKNO), the KMKNO does not represent the Off-Reserve Aboriginal Community who have elected to be represented by the NCNS since 1974.

We assert that the Off-Reserve Aboriginal Communities, as 91(24) Indians, are undeniably heirs to Treaty Rights and beneficiaries of Aboriginal Rights as substantiated by Canada's own Supreme Court jurisprudence. As such, there is absolutely an obligation to consult with the Off-Reserve Community through their elected representative body of the NCNS. The Crown's duty to consult with all Indians extends beyond that only with Indian Act Bands, or as through the truncated Terms of Reference for a Mi'kmaq Nova Scotia Canada Consultation Process.

For contextual purposes, for over forty years, the three Native Council partners of the Maritime Aboriginal People's Council (MAPC) have continued to be the Aboriginal Peoples Representative Organizations representing and advocating for the Rights and issues of the Mi'kmaq/Wolastoqiyik/Peskotomuhkati/Section 91 (24) Indians, both Status and non-Status, continuing to reside on their unceded Traditional Ancestral Homelands. In the early 1970s, the communities recognized the need for representation and advocacy for the Rights and Interests of the off-Reserve community of Aboriginal Peoples, "the forgotten Indian". Women and men self-organized themselves to be the "voice to the councils of government" for tens of thousands of community members left unrepresented by Indian Act-created Band Councils and Chiefs. Based on the Aboriginal Identity question, Statistics Canada (2016 Census - 25% sample) enumerate 21,915 off-Reserve Aboriginal Persons in New Brunswick, 42,145 in Nova Scotia, and 2,210 in Prince Edward Island.

Each Native Council in their respective province asserts Treaty Rights, Aboriginal Rights, with Interest in Other Rights confirmed in court decisions, recognized as existing Aboriginal and Treaty Rights of the Aboriginal Peoples of Canada in Part II of the Constitution Act of Canada, 1982. Each Native Council has established and maintains Natural Harvesting Regimes, and each have a co-management arrangement with DFO for Food, Social, and Ceremonial use of aquatic species, through the: Najiwsgetaq Nomehs (NBAPC), the Netukulimkewe'l Commission (NCNS), and the Kelewatl Commission (NCPEI).

The Native Council of Nova Scotia was organized in 1974 and represents the interests, needs, and rights of Off-Reserve Status and Non-Status Section 91(24) Indians/Mi'kmaq/Aboriginal Peoples continuing on our Traditional Ancestral Homelands throughout Nova Scotia as Heirs to Treaty Rights, Beneficiaries of Aboriginal Rights, with Interests to Other Rights, including Land Claim Rights.

The Native Council of Nova Scotia (NCNS) Community of Off-Reserve Status and Non-Status Indians/Mi'kmaq/Aboriginal Peoples supports projects, works, activities and undertakings which do not significantly alter, destroy, impact, or affect the sustainable natural life ecosystems or natural eco-scapes formed as hills, mountains, wetlands, meadows, woodlands, shores, beaches, coasts, brooks, streams, rivers, lakes, bays, inland waters, and the near-shore, mid-shore and off-shore waters, to list a few, with their multitude of in-situ biodiversity. Our NCNS Community has continued to access and use the natural life within those ecosystems and eco-scapes where the equitable sharing of benefits arising from projects and undertakings serve a beneficial purpose towards progress in general and demonstrate the sustainable use of the natural wealth of Mother

Earth, with respect for the Constitutional Treaty Rights, Aboriginal Rights, and Other Rights of the Native Council of Nova Scotia Community continuing throughout our Traditional Ancestral Homeland in the part of the Mi'kma'ki now known as Nova Scotia.

We appreciate this opportunity to engage on the Waste Oil Recycling and Water Treatment Facility by Envirosol Limited and the Environmental Assessment Review. We look forward to continued dialogue as we continue to advocate for the rights of Off-Reserve Status and Section 91(24) Indians/Mi'kmaq/Aboriginal Peoples of Nova Scotia. To continue to represent the interests and needs of the off-Reserve Aboriginal Community in Nova Scotia, we would like to request the opportunity to participate in early engagement in future Environmental Assessment Reviews.

Advancing Aboriginal Fisheries and Oceans Entities  
Best Practices, Management, and Decision-making

Fish and Fish Habitat Coordinator, MAARS    Executive Director, MAARS & MAPC Projects

CC:                                    Chief & President, NCNS  
    Netukulimkewe'l Commission, NCNS