

# Appendix H

**PUBLIC CONSULTATION DOCUMENT, MAILING LIST  
AND RESPONSE LETTER**





Tabusintac, le 9 février 2017

«Nom»

«Adresse»

«Town», «Province» «Postal\_Code»

«PID»

**Objet : Projet d'expansion de la récolte de tourbe à la tourbière 524 - Tabusintac**

«Appel»

La tourbière 524 de Tabusintac fait l'objet de récolte de tourbe depuis le début des années 1960. Le site a été développé par Heveco qui fait maintenant partie de Scotts Canada Ltée. Scotts Canada Ltée fait face à une demande croissante pour ses produits et veut développer une superficie additionnelle de 309 ha pour la récolte de tourbe (voir la carte attachée). Cette superficie touchera des terres privées (58 ha) détenues par l'entreprise ainsi que des terres publiques (251 ha) sur lesquelles elle détient déjà des droits (bail 9). Le développement des nouveaux champs de récolte devrait s'étaler sur 5 à 6 ans. Les travaux d'ouverture des nouveaux secteurs, ainsi que ceux de récolte et de conditionnement de ce volume additionnel de tourbe nécessiteront l'achat et l'installation de machinerie et d'équipement et engendreront la création d'une vingtaine d'emplois dans la région.

Scotts Canada Ltée prépare présentement une évaluation environnementale du projet en vertu du Règlement 87-83 sur les études d'impact sur l'environnement de la Loi sur l'assainissement de l'environnement.

À ce point du processus, Scotts Canada Ltée désire vous informer et solliciter vos questions et commentaires au sujet de son projet. Je vous invite à nous faire part de tout commentaire, question ou préoccupation concernant le projet d'expansion de la tourbière 524 située à Covedell. Ceux-ci pourront être inclus dans l'étude d'impact environnemental actuellement en préparation.

Le cas échéant, nous apprécierions recevoir votre réponse à la présente lettre avant le 10 mars 2017, par courriel ([covedell.info524@scotts.com](mailto:covedell.info524@scotts.com)) ou par la poste à l'adresse ci-dessous.

Cordialement,

Serge Losier  
Directeur régional opérationnel  
Scotts Canada Ltée  
156, route Covedell  
Tabusintac NB E9H 1E6



Tabusintac, February 9, 2017

«Name»

«Address»

«Town», «Province» «Postal\_Code»

«PID»

**Subject: Peatland 524 Expansion Project - Tabusintac**

«Appel\_EN»

Peatland 524 has been in operation since the early 60s in Tabusintac. It was first developed by Heveco and it is now operated by Scotts Canada Ltd. Scotts Canada Ltd is facing a growing demand for its products and wishes to expand its peat harvesting activities over an area of 309 hectares (ha) on peatland 524 (see attached map). The expansion will be located on crown land within the current lease 9 limits (251 ha) and on land privately owned by Scotts Canada Ltd (58 ha). New peat fields will be developed over a 5-6 year period. The opening of these new fields and processing of additional volume of peat will require the acquisition of new field and plant equipment and will create about 20 new jobs.

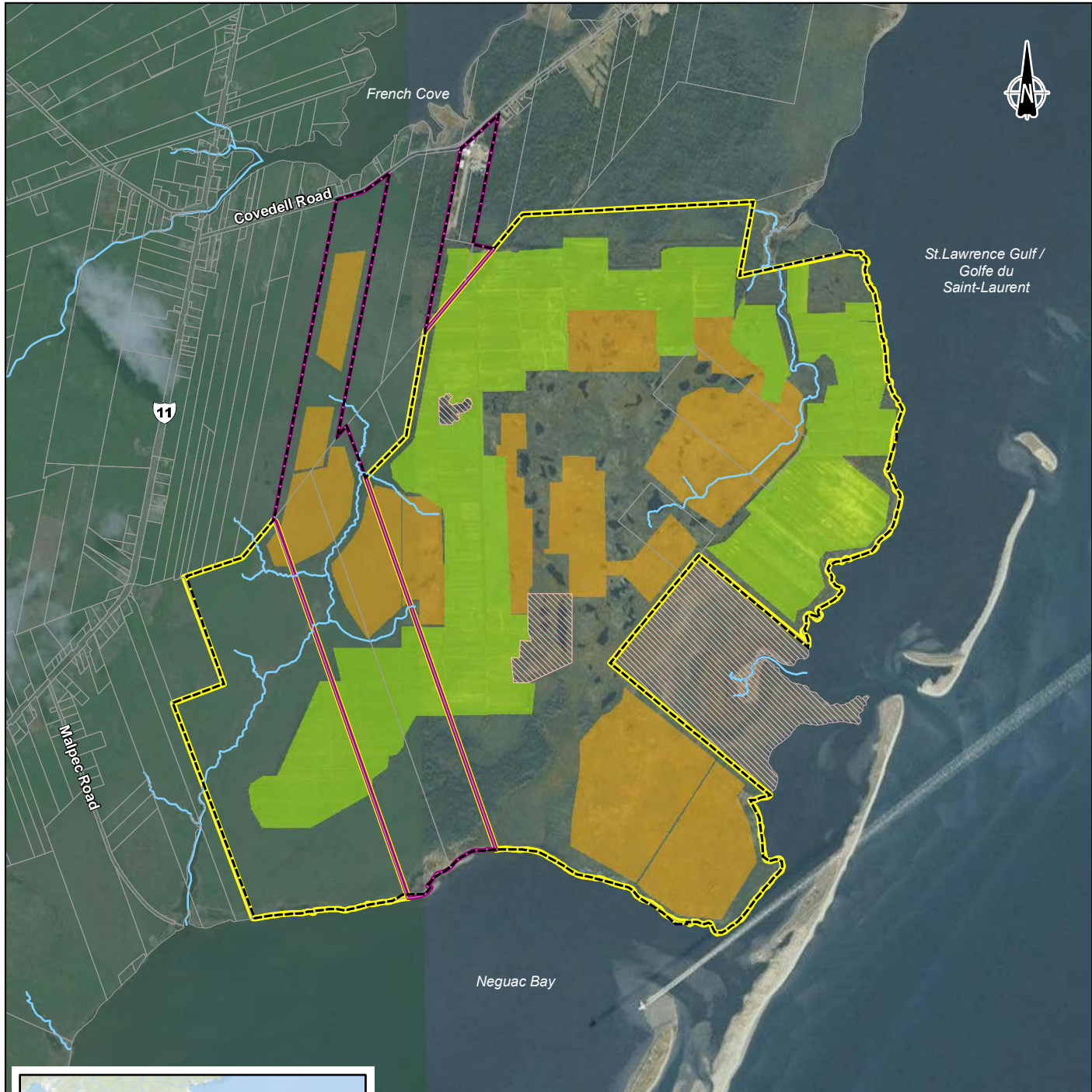
Scotts Canada Ltd is currently preparing an environmental impact assessment for submission to the Department of the Environment and to Local Governments under the Environmental Impact Assessment Regulation (Regulation 87-83 of the Clean Environment Act).

At this stage of the process, I write to notify you of the project as part of the public consultation process. I invite you to communicate with us if you have any comment, question or concern regarding the Covedell expansion project. Note that your comment/question/concern shall be included in the environmental impact study.

If applicable, please send us your response before March 10, 2017 by email ([covedell.info524@scotts.com](mailto:covedell.info524@scotts.com)) or via mail at the address below.

Best regards,

Serge Losier  
Regional Operational Director  
Scotts Canada Ltd  
156 Covedell Road  
Tabusintac NB E9H 1E6



St. Lawrence Gulf /  
Golfe du  
Saint-Laurent



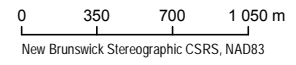
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- Proposed expansion / Expansion proposée
- Current operation / Secteur développé
- Protected area / Zone protégée
- Scotts property / Propriété de Scotts
- Lease 9 / Bail 9
- River / Cours d'eau
- Parcel limit / Limite de lot
- Project Area / Limite du projet



Peatland 524 Expansion Project /  
Projet d'expansion de la tourbière 524

**Project Location /  
Localisation du projet**



Sources :  
• GeoNB (SNB)  
• World Imagery, 2010  
• World Ocean Base

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February / Février 2017





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Miramichi River Environmental Assessment Committee

Comité Sauvons nos Rivières

Tabusintac Watershed Association

Club de Naturalistes de la Péninsule acadienne

Piper Project

NB Wildlife Federation de la Faune du N.B.

Dept of Energy and Resource Development (formerly DNR) Regional Biologist

Tabusintac Water Shed

Tabusintac Local Service

Mr. Pat Finnigan, Member of Parliament

Ms. Lisa Harris Member of Legislative Assembly

February 20, 2017

Scotts Canada Ltd  
156 Covedell Road  
Tabusintac, NB E9H 1E6

Attention: Serge Losier  
Regional Operational Director

Dear Mr. Losier:

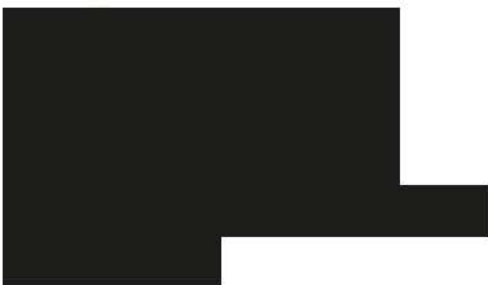
In response to your recent letter regarding the expansion of Scotts to encompass another 309 hectares I do have environmental concerns:

1. The destruction of the habitat for wild birds in order to fulfill orders for peat products
2. The creation of additional dust and airborne material which already affects our outdoor seating areas and air quality.
3. The additional drainage of wetlands that will occur causing further loss of an area that was once renowned for hunting of wild geese and ducks.

Please take these comments into consideration prior to the scheduled expansion going forward.

I would appreciate the opportunity to read the Environment Impact Assessment that you will be submitting to the Department of the Environment and Local Governments and their response to same.

Thank you,

A large black rectangular redaction box covering the signature and name of the sender.

Concerned Tabusintac Citizen

Cc: Hon. Serge Rousselle Q.C. – Minister Environment and Local Government  
Hon. Lisa Harris – Minister of Seniors and Long Term Care  
Tabusintac LSD

2017-02-26

Serge Losier  
Regional Operational Director  
Scotts Canada Ltd  
156 Covedell road  
Tabusintac NB E9H 1E6

**Subject: Peatland 524 Expansion Project-Tabusintac**

Dear Mr. Losier,

Thank you for your recent letter informing us of your planned expansion of the peat harvesting operation in the Blacklands/Neguac Bay area.

We are extremely concerned of the impact the planned expansion of the peat harvesting area will have on our aquaculture oyster grow out operation. Future expansion and harvesting/mining of the peat lands will, we feel, be detrimental to our oyster aquaculture operation [REDACTED]. This site is in close proximity to your mining site and we are concerned about silt deposits emanating from the draining of the peat properties as well as dust settling on the ocean surface. In addition to our oyster aquaculture site, quahogs and oysters grow naturally on this site. We have been letting these grow and populate for future harvesting. We feel that these wild quahogs and oysters will also be affected by the planned peat harvesting/mining expansion.

Please be advised that we will be sending a letter to the Department of the Environment and will be asking them to monitor this situation very closely. We will also be contacting the provincial Department of Agriculture, Aquaculture and Fisheries. The present announcement of your expansion is affecting our plans of investing and growing our present operation. We ask, therefore, that you keep us informed on the results of your environmental impact study and what recommendations and protection will be given to us as aquaculture producers. We would appreciate confirmation of reception of this letter.

Thank you again for your correspondence seeking our comments and concerns.

Sincerely,

[REDACTED]

cc Hon. Serge Rousselle, Minister of Environment and Local Government, Province of New Brunswick  
cc Hon. Rick Doucet, Minister of Agriculture, Aquaculture and Fisheries, Province of New Brunswick

March 9-2017

Scots - peatland 524 expansion project  
harvesting mass on lot 6 - Coredell Rd

Please note below my concerns of  
said project

- 1- fill importation - thousands of loads  
of fill have already been imported on  
site and dumped on the bog for road  
building purposes
- 2- Truck traffic will increase you are  
shipping mass 24 hrs a day trucks  
running all night
- 3- Dust Control - you have none  
clouds of dust blowing off site  
all summer
- 4- Water table - construction of  
slit trenches for drainage ~~is~~ will  
change water course threaten ponds  
on [REDACTED]

5- wild life endangerment - slit trenches are a hazard to all wild life especially moose who have become trapped in your existing slit trenches

6- 20 jobs created will be seasonal low paying ~~with~~ no benefits or pensions

7- Noise Pollution.

8- no restraation plan - when the moss is all extracted well imported fill be removed

9- Scatts is a poor neighbour - it took them 2 years to respond to a letter of compliant from me regarding slit trench on my property.

Yours truly

[Redacted signature]

To Whom It May Concern

03/08/2017

I have received your intentions to expand and to increase your production on peat land 542, and also your wish to start harvesting activities on land privately owned by Scotts Canada Ltd. The opening of these new fields and processing of additional volume of peat will increase the dirt particual of peat that floats over the tree line and settles over and in our homes, And, these new sites which would be closer to existing dwellings and their practice of vacuuming in the fields with a full tank and the blow pipe is spewing the peat particuals in the air about 30 feet, which is being carried by the wind over the neighbours lots. With higher demands of this product, activity on our roads increases, that means more trucking, which therefore means more peat moss on our cars and houses, With trucking outside the plant means more dirt and mud at the entrance and exit which takes forever to be cleaned up even after numerous demand.

Also the problem with plastic that blows by nearby woodlots will have to be looked into, recycling would be a much better option than landfill and will cost less and be more environmentally friendly. When you are planning environmental impact assessment bear in mind of existing clean water and clean air regulations.

Upgrades need to be done on drainage of excess water, especially in and around the oyster beds. These particulates get into the water, sink to the bottom and kill the oysters. Please have an open mind when making your environmental impact assessment for clean air and water.

Yours Truly,





Mr. Serge Losier,

Thank you for notifying us of your expansion plans at the Covedell site.

We welcome the presence of Scotts Canada Ltd in the community and the employment harvesting the local peat resource brings. From a Local District Advisory viewpoint, our concerns are below:

1. The increased truck traffic on the Covedell Rd has already brought additional strain to the road base. While the road may be a DTI matter, we've heard persistent complaints of peat spillage from the trucks, and/or mud from the site causing days of dirty/muddy roadway access. How could this be better addressed?
  
2. From a wildlife perspective, migrating waterfowl have sought refuge in any on the many ponds on the blacklands. From a recreational perspective, many regional hunters have made use of these ponds for the hunt. a. With the proposed expansion, what consideration/protection has been given to the waterfowl habitat, and b. Assuming the habitat remains, would hunters continue to have access?

Again, thanks for your time and community partnership, and wish you much continued success.

Chris Avery - Chair  
Tabusintac Local Service District

Hello M. Losier,

I am writing to comment on the proposed expansion of peat harvesting activities at Tabusintac on an additional 251 ha of leased Crown land and 58 ha of private land by Scott Canada Ltd. The Nature Conservancy of Canada (NCC) has been acquiring land for conservation around the Tabusintac Estuary since 1993 and to date, has protected over 460 hectares of private land. NCC's conservation work on the Tabusintac Estuary has been funded by federal and provincial governments, the US Department of Fish and Wildlife through the North American Wetlands Conservation Act (NAWCA), and by private foundations, corporations and individuals. The Tabusintac Estuary is one of only 37 wetlands across Canada designated as a *Wetland of International Importance*, under the Ramsar Convention. The site is a major waterbird concentration area during spring and autumn migration for a high diversity of shore and waterbirds, supported by the eelgrass (*Zostera marina*) beds in the estuary. The beach system, considered a tern "core colony" of importance due to high reproductive success rates, supports the second largest nesting colony in New Brunswick. A barrier beach and dune system, protects the coastal lagoon system and is an important breeding site for the globally vulnerable, and nationally endangered Piping Plover. The surrounding peatlands and forest support provincially rare plants and nesting Osprey and Great Blue Heron. Given the tremendous ecological significance of this area and the conservation investment that has been made, as well as conservation commitments made by the provincial and federal governments under international agreement, we recommend that the environmental assessment should take into consideration all direct or indirect effects on wildlife and their habitats; particularly the coastal lagoon and the waterbirds that depend on this site. NCC's concerns include the following:

- Ensuring protection of the water quality and clarity in the estuary through the prevention of silt run-off or settling of air borne particulates from the harvest operations. We would like to review plans to prevent run off or dust production.
- We are also concerned about shoreline erosion and would like to see a plan to prevent erosion where harvesting is close to the edge of the estuary. This should include adequate buffer being left between harvest area and the shoreline of the estuary.
- We recommend an expert biological inventory be completed on the proposed additional harvest sites and mitigation measures be proposed if any provincially rare or at-risk species are identified.
- Where the harvesting occurs adjacent to conserved land, we would like to see a plan to prevent, or at least minimize, impact on the hydrology of the conserved land. We are concerned that hydrological changes due to adjacent harvesting may alter the ecosystems on conserved lands. If there is not currently adequate information to predict and mitigate such changes, then we would be interested in working with the company to identify research needed to answer this question.
- Finally, we would like to have the opportunity to comment on restoration plans for the site following harvest.

We appreciate the chance to provide our comments and concerns and look forward to further engagement on this proposed expansion.

Regards,  
Paula

**Paula Noel**

Program Director, New Brunswick / Directrice des programmes, Nouveau-Brunswick

**Nature Conservancy of Canada / Conservation de la nature Canada**

924 Prospect Street, Suite 180, Fredericton NB E3B 2T9

T: 506.450.6010 | 1.877.231.4400

[www.natureconservancy.ca](http://www.natureconservancy.ca) | [www.conservationdelanature.ca](http://www.conservationdelanature.ca)

