



Conservation Council *of* New Brunswick
Conseil de conservation *du* Nouveau-Brunswick

**Conservation Council of New Brunswick Comments on Mill Modernization
EIA for Reversing Falls Mill by Irving Pulp & Paper, Ltd., EIA Project No.
1630**

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Comments:

Section 2.8.3 Stage III - Project Operation Maintenance:

- The increase in mill production and improvements to scrubbers are expected to enable the Reversing Falls Mill to produce its own energy, reducing reliance on NB Power. While Scope 1 emissions are expected to increase, Scope 2 emissions are projected to decrease, contingent on the continued high carbon intensity of the NB Power grid. However, there is a significant increase in Scope 3 emissions due to increased production, which has not been accounted for. The expected increase in production would result in an additional 27,361 trucks entering or leaving the mill and 5,961 railcars over the 50-year operational lifespan, contributing to a considerable amount of Scope 3 emissions.
- The increase in production will necessitate more biomass removal from managed forests, impacting upstream ecosystems, increasing erosion, and potentially affecting hydrology.
- Increased wood removal would require more herbicide spraying, exacerbating unsustainable forestry practices.

Air Contamination:

- Tables 36, 38, and 39 show air contamination levels pre- and post-project. Some tables show that NO₂ and SO₂ emissions are expected to increase, but after normalization, the

data shows a decrease in emissions. More clarification is needed on how the normalization is done.

Section 5.2 Pre-registration Engagement and Consultation:

- The section claims engagement with Indigenous communities but does not provide details on the outcomes or comments received from these communities. Additionally, the EIA references Appendix XII for more information, but this appendix is not available on the EIA [website](#).

Carbon Credits and NB Power:

- There is concern about selling excess power back to NB Power. Questions arise about whether carbon credits would be generated from this sale. The concern is that natural gas and other biofuels used to generate steam for cogeneration turbines might be contributing to fossil fuel use. Despite claims of green energy, the involvement of fossil fuels suggests that no carbon credits should be awarded.