

Environmental Assessment - Project Comments

Submission ID

e0fd974a

Submission Date

07/02/2026 14:26

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

Please extend full consideration and comment to the community of Salt Springs before proceeding with this project

Name:

Email:

City/Town

Trenton

Postal Code

B0k 1x0

Attachment(s):

Drag & drop or [choose file](#) to upload

Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls, xlsx

Maximum number of files allowed: 10

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Environmental Assessment - Project Comments

Submission ID

34134efe

Submission Date

07/02/2026 15:08

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

Concerns have been raised by several members of the Nova Scotia Bird Society regarding this project and its proximity to large areas of habitat frequented by numerous bird species, some uncommon and threatened and which would be protected by federal law - we feel the EA carried out does not cover a large enough area to give a true sense of the projects impact.

Name:

Email:

City/Town

Cape Forchu

Postal Code

B5a 5g7

Attachment(s):

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Environmental Assessment - Project Comments

Submission ID

6da5d03b

Submission Date

07/02/2026 21:31

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

Why Does Pictou County Have Such Low Self-Esteem?

Sixteen years ago, when my husband and I bought an old house off the internet near Salt Springs; everyone we knew in Toronto told us it was a terrible idea. The warnings came from every direction. Even the bank agent who handled our Toronto mortgage refused to approve the new one and actually yelled at us for considering Nova Scotia. People had all kinds of strange, outdated ideas about this province.

All we knew was that we wanted to devote our time to our own small business. And we're proud to say that over the past sixteen years, the vast majority of our clientele has come not only from outside Nova Scotia, but from outside Canada entirely. A large portion of our income has never taken anything from Nova Scotia. We don't extract, pollute, or damage the natural beauty of this place we consider paradise.

Yet every time we turn around, there's a new industrial extraction or pollution threat; always in the name of "jobs." It seems to me that what Nova Scotia, and Pictou County in particular, really needs is more remote workers like us: people who realize how valuable this place is.

Do you remember when MoneySense Magazine declared New Glasgow the "Worst place to live in Canada"? The irony is that the quality of life here, in so many ways, is far superior to what my husband and I have experienced in other parts of Canada, the U.S. or overseas. This is the place. We've even joked that we must have died, gone to heaven, and ended up here.

together and separately we've lived, worked and travelled in multiple countries. When we arrived, we found a paradise unlike anything we'd seen before. Nowhere have we found a higher quality of life. Nova Scotia is majestic in countless ways.

We were astonished that all the negative things we'd heard were completely untrue. By taking a chance, we found our paradise.

But then; what's that horrendous stench? Oh, the pulp mill. That mill was the only depressing thing we encountered here, and it was bad. The smell; like a mix of vomit and a dirty diaper; blanketed Pictou and surrounding areas. We've attended outdoor events like the Lobster Carnival on days when that debilitating, soul-crushing odour permeated everything. I remember looking around and wondering how people had lived with it for so long, and why they still had to. The attitude seemed to be: "This is just industry... because... jobs?" As if Pictou County must trade clean air and cancer-causing pollutants for employment.

Now, after 60 years of pollution, we the people are on the hook for a half Billion dollar cleanup, as a minimum.

That same amount would pay over 10,000 decent salaries in today's dollars; far more than the mill ever did in it's entire lifetime; without the terrible health burdens on families and our medical system.

But this Nova Scotia government doesn't want to learn the lesson.

They are determined to "expand natural resource development", a nice, friendly, greenwashing way of saying fracking methane and unearthing uranium.

I don't mean to be insensitive. I understand that in the past, survival here was harder. I'm not condemning Nova Scotia's coal-mining history. But progress exists for a reason. Just because your community was once a mining town doesn't mean your children have no other opportunities.

I had never even heard of Alberta oil patch jobs until we moved here. It seems that many people in Nova Scotia believe that's the only kind of job available to them. But things are changing. There are more opportunities now than there used to be, and my husband and I are living proof of that.

We don't plan to leave; but now our own water supply is under threat as yet another extractive industry arrives to abuse, deplete, and destroy the land. As an appointed citizen member of the Municipality of Pictou County's Planning Advisory Committee, I'm sorry to say I don't have much faith in the Municipality's ability to protect residents from this, especially when the provincial government appears determined to push it through. And let's be honest: calling methane gas "green energy" is pure greenwashing.

Replacing coal with methane is not a practical solution to meeting our climate targets, it's just another plunder.

Name:

Email:

City/Town

Postal Code

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Salt springs and Marshdale toxic power plants

Date Sun 2026-02-08 4:16 PM

To Environment Assessment Web Account <EA@novascotia.ca>

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

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I recently heard that IESO and our government wants to poison school children in the communities of Salt Springs and Marshdale here in Nova Scotia. The RCMP has also made me aware that I'm not legally allowed to say what I want about IESO and our government since they both have a long history of poisoning people. If these toxic power plants are approved, citizens should considered civil war as an option to stop our government. Thank you for understanding that the health and well being of a community will never be jeopardized because of failing power companies. Go poison someone else IESO! WE HATE YOU!
Sent from my iPhone

Response to the Environmental Assessments for the Marshdale and Salt Springs Natural Gas Power Generation Facility Projects

Submitted by: _____, executive members of the Margaree Environmental Association, Cape Breton, NS.

February 8, 2026

We and our organization have been involved in a wide range of environmental issues, including the promotion of alternative energy, and have campaigned actively to reduce the use of fossil fuels to generate power. Our organization was formed in 1988, and over the past four decades we have challenged government policies and programs, advised government and industry on forestry and environment, and have developed projects to further human and environmental health.

We reviewed the Environmental Assessments for the proposed Marshdale and Salt Springs 300MW natural gas power generating facilities and find these assessments to be both inadequate and suspicious. They are inadequate because they fail to properly investigate non-fossil fuel alternatives, and suspicious because they do not establish the need for natural gas power development in the current Nova Scotia context.

We contend that new fossil fuel-based power generating plants are not needed here at this time. Instead, we should continue to build new alternative infrastructure, make deals with Quebec for supplementary hydro power, and use our existing coal fired power plants for back-up when wind, solar, and hydro power are inadequate.

To augment our use of alternative power, more battery storage should be built instead of expensive natural gas power plants. Once the capital cost of battery storage is expended, the maintenance of the storage is minimal, versus the on-going high cost of natural gas.

Burning natural gas has excessive operating costs and unconscionable environmental costs to both the climate of the planet, and through the inevitability of fracking, the geology of Nova Scotia. It will be the ratepayers, the public and the environment that bears the onerous costs if these gas power plants are built.

Our provincial government has recently announced an austerity plan in light of provincial debt and deficit, and in the premier's words, we must start with government. Why then, has the provincial government created the new IESO agency to manage power generation in the province, when the skills and resources exist to do that already. The formation of the IESO is both suspicious and contradictory.

The two proposed 300MW natural gas power generation projects, the process by which the government has initiated them, the long-term costs to be borne by the rate-payers and the public, the failure to consider better alternatives and best practices, together lead us to think that there is something fishy here; that there are other agenda at play; the whole thing just doesn't pass the sniff test.

Instead, it is our conviction that Nova Scotia should continue to expand wind power, build more battery storage, negotiate a deal with Quebec for supplementary hydro power, and make responsible use of existing coal plants for back-up power when needed.

Sincerely,

Re: Response to Environmental Assessments for Marshdale and Salt Springs Natural Gas Power Generation Facility Projects

Date Mon 2026-02-09 1:59 PM

Cc Environment Assessment Web Account <EA@novascotia.ca>

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Well said.

On Sun, Feb 8, 2026 at 5:22 PM

Please see attached our response on behalf of the Margaree Environmental Association regarding the Environmental Assessments for the two 300MW natural gas power generating projects being
Nova Scotia.
y questions you may have regarding our submission.

Fast Acting Natural Gas Power Generation Facility - Marshdale, Pictou County and Fast Acting Natural Gas Power Generation Facility – Salt Springs, Pictou County

Date Mon 2026-02-09 3:59 PM

To Environment Assessment Web Account <EA@novascotia.ca>

XTERNE **

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Department of Environment and Climate Change
PO Box 442
Halifax, NS, B3J 2P8

Email ea@novascotia.ca

Re: Fast Acting Natural Gas Power Generation Facility - Marshdale, Pictou County and Fast Acting Natural Gas Power Generation Facility – Salt Springs, Pictou County

To whom this may concern,

Thank you for this opportunity to provide public comments on these projects.

It is unclear in these filing documents whether one or two fast-acting gas power facilities are being proposed by the IESO. The documents state that multiple locations were considered, but do not indicate whether one receives EA approval if the other is still in the works. Without clarity, essentially, two plants equal twice the concern.

While understanding Nova Scotia's Energy Plan and federal requirements to phase out coal energy by 2030, the justification for this development remains clouded. Without a domestic gas supply in hand, dependence on the Maritimes-NorthEast pipeline promotes continued North American fossil fuel procurements and importation of hydraulically fractured gas from the United States and/or other parts of Canada. There is no way to know where the gas originated once in the pipe. Although the current government in NS has ill-advisedly removed the fracturing ban in Nova Scotia to provide potential for a local onshore supply, and has called for renewed interest in offshore investments, no bids are publicly known to be forthcoming.

Evidence of detrimental health and environmental effects caused by fracking and associated gas infrastructure is abundant, though it is unfortunately and continually ignored by industry regulators. Public concerns regarding natural gas reach much farther than the immediate fallout zone of PM emissions from these proposed plants and must be considered in the long-term impacts associated with an imported or locally sourced natural gas supply.

The cumulative effects of leaking pipelines, flaring gas wells, fracking fluids, and environmental disruption are not minimal on the planet, and should not be ignored in the overall assessment of these projects. Regulations are not set, nor traditionally upheld sufficiently, across the board. Simply being “cleaner than coal” is not an ideal solution for future energy production in Nova Scotia, and the impacts on environmental and citizens' health across a fracked continent are not negligible. See examples: <https://endocrinedisruption.org/audio-and-video/fracking-related-health-research-database/search-the-database#keywords=&stream0=animal&stream1=human&stream2=in+silico+and+risk%2Fhazard+assessment&stream3=in+vitro&action=search>

<https://concernedhealthny.org/category/documentation/peer-reviewed/>

It is apparent that a clear bias towards continued expansion in wind turbines exists within these proposals, and that other viable alternative energy sources may not have been adequately investigated by the IESO, including upgrades to existing small hydro, investment of in-stream hydro (<https://www.smart-hydro.de/renewable-energy-systems/hydrokinetic-turbines-river-canal/>), pumped hydro energy storage (https://atb.nrel.gov/electricity/2022/pumped_storage_hydropower), compressed air and gravity energy, (https://www.e3s-conferences.org/articles/e3sconf/pdf/2020/22/e3sconf_icpeme2020_01001.pdf), and algae – capable of carbon capture at existing coal burning facilities and producing biofuels. (<https://pondtech.com/>).

Section 3.4.211 Vegetation management should include a ban on broad-spectrum pesticides and herbicides that may migrate from the project site and adversely affect neighbouring properties.

Groundwater modelling should be implemented in the planning process, and assurances must be made to MOPC that ensure public water quantity and quality will not be negatively affected.

If approved, continuous emission monitoring equipment must be installed to ensure public safety and regulatory compliance.

I believe that the privatization of Nova Scotia's current energy production was a mistake made by previous governments, and that all new energy infrastructure should remain the property of citizens of the province and not be controlled by any private company, even in partnership with First Nations.

As another alternative option, IESO could renew negotiations with the Churchill and Muskrat Falls hydro facilities to provide affordable rates, not only for New Yorkers, until 2041. Those project cost overruns should not prevent Nova Scotians from benefiting from these existing Canadian clean energy producers.

Thank you for your time and attention.

Regards,

Concerned Citizen



Impact Assessment Agency of Canada
200-1801 Hollis Street
Halifax, Nova Scotia B3J 3N4

Marshdale Natural Gas Power Generation Facility Project
Project reference number: 90111
Email: Marshdale@iaac-aeic.gc.ca

Salt Springs Natural Gas Power Generation Facility Project
Email: SaltSprings@iaac-aeic.gc.ca
Project reference number: 90114

Environmental Assessment Branch
Department of Environment and Climate Change
PO Box 442
Halifax, NS, B3J 2P8
Email: ea@novascotia.ca; EA@gov.ns.ca

February 9, 2026

RE: Fast Acting Natural Gas Power Generation Facility – Marshdale and Salt Springs

As physicians and healthcare providers representing the Canadian Association of Physicians for the Environment (CAPE) in Nova Scotia, we are submitting our concerns regarding the proposed fast-acting natural gas power generation facilities for Marshdale and Salt Springs in Pictou County, submitted by IESO Nova Scotia.

CAPE is a national non-partisan, physician-led organization with over 36,000 supporters and regional committees in 9 provinces, including Nova Scotia. We bring an evidence-based and health-focused approach to the intersecting issues of environment, health, and social justice.

For the purposes of this submission, CAPE Nova Scotia will address and refute the proponent's assumption that the construction and operation of these 300 MW gas power generating facilities in Marshdale— for a minimum of 30 years—pose negligible risk to the health and wellbeing of Nova Scotians.

What Is Natural Gas?

While the industry frequently uses the term "natural gas" to suggest a clean or organic energy source, this phrasing is a marketing descriptor rather than a scientific one. From a medical and environmental health perspective, it is more precise to identify the substance by its primary chemical component: methane (CH₄).

Therefore, below we refer to methane gas and the fast acting methane gas power generating facilities.

Methane is a supercharged greenhouse gas that is well known to accelerate global heating.

Burning fossil fuels is the primary cause of climate change¹

This is no longer a matter of serious debate. The United Nations, the World Health Organization, the International Energy Agency, and the Canadian government have all issued warnings and reports calling for the rapid reduction of burning fossil fuel and a transition to renewable energy. Their reports and statements underscore the grave dangers posed by the escalating climate crisis, biodiversity crisis, and air pollution—and their cascading effects on human health and mortality.

Health Effects Arising from Climate Change

The warming climate in Nova Scotia is already resulting in preventable injury, illness, and death. National data confirms that climate change is a primary driver of health effects related to rising temperatures, extreme heat, and the expansion of zoonotic diseases.²

- **Extreme Heat and Respiratory Health:** In Canadian cities, extreme heat increases mortality rates by 2% to 13%.³ Furthermore, air pollution from fossil fuel combustion and increasing wildfire smoke already causes approximately 15,300 premature deaths in Canada annually.⁴
- **Infectious Diseases:** Warming temperatures have facilitated the northward expansion of ticks, making Lyme disease a permanent and growing health threat in our region.⁵ In just the last five years we have seen the emergence of two other tick-borne infections in Nova Scotia: anaplasmosis and babesiosis.
- **Mental Health and Displacement:** The devastating floods and wildfires Nova Scotia has experienced are not just infrastructure crises; they are mental health crises. We see spikes in PTSD, anxiety, and depression following these events.

¹ [Causes and Effects of Climate Change | United Nations](#)

² Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

³ Ibid

⁴ Health Canada. (2022). *Canada's Changing Climate: Implications for Health and Well-being*.

⁵ Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

Impact on Healthcare Delivery and Infrastructure

Extreme weather events and wildfires, which are becoming more frequent because of climate change, also directly impact healthcare workers, their clinics, and hospitals. When wildfires occur, smoke infiltration can compromise the air quality within medical facilities, and evacuation orders can force the closure of community clinics, disrupting essential care. Severe flooding and storms can block transit routes, preventing healthcare staff from reaching their shifts and delaying emergency response times. These disruptions create a secondary health crisis where the system's capacity to respond is diminished exactly when the community's need is greatest.⁶

Why does this project worry us?

There is no doubt that Nova Scotia is, as is the rest of the world, experiencing the adverse effects of climate change. Given the release of methane associated with the processes of its exploration, extraction, transportation, and use, Nova Scotia should not be developing technologies that rely on fossil fuel extraction to support electricity generation. Additionally, the exploration and extraction of methane frequently rely on fracking, with clearly demonstrable short and long term adverse health effects.

Local Health Risks of Methane Gas Plants

Burning methane gas doesn't just fuel climate change. It comes bundled with toxic pollutants that threaten our health. These include volatile organic compounds, particulate matter, and smog-forming gases that can lead to premature death, breathing and heart problems, and even cancer. A report from the Health and Environment Alliance estimates that gas plant emissions cause 2,800 premature deaths in Europe as well as ~15,000 cases of respiratory illness including lung cancer, COPD, and childhood asthma, and incurring health and productivity costs in excess of 8.7 billion euros (US\$9.11 million USD)⁷ Even though the air quality modeling in the environmental assessment shows levels of pollutants below nationally recommended thresholds, there is no guarantee that any level of these toxins is safe for humans.^{8 9}

⁶ Berry, P., Enright, P., et al. (2022). "Adaptation and Health System Resilience." In *Health of Canadians in a Changing Climate*.

⁷ Health and Environment Alliance. Health and Environment Alliance. 2022 [cited 2024 Dec 31]. False fix: the hidden health impacts of Europe's fossil gas dependency. Available from: <https://www.env-health.org/false-fix/> in *Cradle to Grave: The Health Toll of Fossil Fuels and the Imperative for a Just Transition*. September 2025 by the Global Climate and Health Alliance <https://climateandhealthalliance.org/cradle-to-grave-the-health-toll-of-fossil-fuels-and-the-imperative-for-a-just-transition-2nd-edition/> accessed February 9 2026

⁸ [Health Impacts of Air Pollution in Canada: Estimates of morbidity and premature mortality outcomes – 2021 Report](#)

⁹ [Mortality and Morbidity Effects of Long-Term Exposure to Low-Level PM2.5, BC, NO2, and O3: An Analysis of European Cohorts in the ELAPSE Project - PubMed](#)

Summary

In this submission, we focus on the direct health implications of methane, primarily as they relate to its role in driving climate change. However, we are equally concerned about the risks associated with hydraulic fracturing (fracking) should there be any intention to source gas locally within Nova Scotia.

Until the full scope of the supply chain is disclosed and a comprehensive health risk assessment is conducted, this project should be paused.

Sincerely,

Chair, Canadian Association of Physicians for the Environment – Nova Scotia (CAPE NS)



Nova Scotia EIA Submission – Marshdale Gas Plant

February 9, 2026

Executive Summary

Sierra Club Canada Foundation submits these comments to the Nova Scotia Department of Environment and Climate Change in respect of the proposed Marshdale Natural Gas Power Generation Facility, pursuant to the provincial Environmental Assessment Regulations under the *Environment Act*.

The decision before the Minister is whether the Environmental Assessment Registration Document (EARD) and associated materials provide a sufficient and defensible basis to grant approval – including conditional approval – for the Project, without unacceptable adverse environmental effects and with confidence that any residual effects can be effectively mitigated through enforceable conditions.

Based on a detailed review of the EARD, Sierra Club Canada Foundation submits that the current EA record does not meet that threshold.

Across multiple issue areas, the assessment exhibits a consistent and material pattern: potential adverse effects are systematically understated, not because evidence demonstrates they are insignificant, but because key analytical steps are deferred, scoped narrowly, or based on assumptions that are neither defined nor tested within the EA record itself. This pattern recurs across climate change and greenhouse gas emissions, project need and alternatives, human health and air pollution, water and groundwater, wetlands and terrestrial habitat, species at risk and migratory birds, fish and fish habitat (including Atlantic salmon), and cumulative effects.

Taken together, these deficiencies mean that the Minister is being asked to approve the Project on the basis of assumptions about future system behaviour, mitigation effectiveness, and regulatory follow-up, rather than on a record that conservatively bounds environmental effects at the time of decision.

Climate Change and Greenhouse Gas Emissions

The assessment claims the project aligns with climate goals, but it doesn't specify how often the facility will run or what its long-term emissions might be. There are no enforceable limits or detailed analysis of worst-case scenarios. Without this information, it's impossible to know if the project's climate impact is being underestimated.

Project Need and Alternatives

The assessment claims that new dispatchable power generation is necessary and presents the project as a solution to broader energy planning goals. But it doesn't offer any concrete numbers or details to show exactly why this facility, at this size and schedule, is needed. Instead of laying out its own analysis, the EIA leans on outside planning documents—like Integrated Resource Plans—without actually including the supporting data or reasoning. This leaves important questions unanswered about whether the project is truly justified.

Similarly, alternatives are acknowledged but not assessed through transparent, comparative analysis. Non-gas alternatives — including storage, demand-side measures, and system-level solutions — are referenced but not evaluated using consistent metrics or scenarios. This approach prevents the Minister from determining whether the Project's effects are avoidable or whether non-fossil fuel alternatives could meet the same objectives. In the absence of a defensible need and alternatives analysis within the EA record, approval is not justified.

Human Health and Air Pollution

Human health effects are assessed primarily through compliance-based air dispersion modelling. Regulatory compliance is treated as a proxy for safety, without a project-specific assessment of population exposure, cumulative pollutant loading, episodic emissions, or vulnerability. In particular, fine particulate matter (PM_{2.5}) is modelled for compliance but not evaluated for health effects below regulatory thresholds or under worst-case operating conditions.

This approach understates potential adverse effects on human health, especially where emissions may be intermittent, climate-amplified, or coincident with other pollution sources.

Water, Wetlands, and Ecological Systems

Across water resources, wetlands, and terrestrial and aquatic habitats, the EA record relies on compartmentalized and area-based assessment rather than integrated, function-based analysis. Groundwater and surface water interactions are assessed without climate-informed stress testing or watershed-scale context. Wetland impacts are characterized primarily by mapped area and mitigation intent, without evaluation of ecological function, connectivity, or cumulative loss in a region already subject to historic depletion.

Similarly, fish and fish habitat — including Atlantic salmon and cold-water systems — are addressed through fragmented analysis of water quality, hydrology, and habitat alteration, without an integrated assessment of system integrity or population-level vulnerability. This fragmentation masks potential adverse effects protected under provincial law and policy and prevents the Minister from assessing whether ecological impacts may be more significant, persistent, or less reversible than presented.

Endangered Species, and Cumulative Effects

The EA record relies heavily on presence/absence surveys, proximity-based screening, and project footprint boundaries to assess effects on species at risk protected in NS. Functional habitat loss, landscape context, and cumulative pressures are not assessed at a scale commensurate with species ecology.

More broadly, effects are considered in valued component (VC) silos rather than through an integrated, system-level analysis, without evaluating how climate change, emissions, habitat alteration, and hydrologic change may interact over time and across the region. This approach systematically understates cumulative and regional effects.

Deferral to Future Permitting

Across multiple issue areas, the EA record defers critical analysis – including mitigation effectiveness, compensation design, operational limits, and climate sensitivity – to future permitting and approvals. While future regulatory processes play an important role, deferral at the approval stage is not neutral. Where key uncertainties remain unresolved, deferral functions to understate risk rather than to demonstrate that effects are well understood and insignificant.

Taken together, the deficiencies identified in this submission demonstrate that the Marshdale Project has the potential to result in adverse environmental effects that are not adequately characterized in the current EA record.

Detailed Comments

1. Purpose of These Comments

Sierra Club Canada Foundation submits these comments to the Nova Scotia Department of Environment and Climate Change in respect of the proposed Marshdale Natural Gas Power Generation Facility, pursuant to the provincial Environmental Assessment Regulations under the *Environment Act*.

2. Project Overview and what the Minister is Being Asked to Accept

The Marshdale Project is described as an approximately 300 MW simple-cycle natural gas-fired generating facility, with the ability to operate on light fuel oil, proposed for a greenfield site in Nova Scotia. The proponent states that the facility will operate for a minimum of 30 years, extending well beyond Canada's 2050 net-zero target.

Throughout the EARD, the Minister is asked to accept several core assumptions, including that the Project will operate primarily as a low-utilization, fast-acting resource; that its greenhouse gas emissions will be limited or offset through changes elsewhere in the electricity system; that alternatives have been adequately considered through external planning processes; that air quality and human health impacts will be minor and compliant with standards; that water, wetland, and ecological impacts are localized and readily

mitigated; that cumulative effects can be addressed through scoping rather than integrated analysis; and that remaining uncertainty can be addressed through future permitting and approvals.

For the Minister's purposes, the issue is not whether these assumptions are plausible in theory. The issue is whether the EA record provides sufficient, project-specific, enforceable information for the Minister to rely on them in approving the project.

As discussed below, it does not.

3. Climate Change and Greenhouse Gas Emissions

(At issue: Systematic Understatement of Long-Term Emissions)

3.1 What the EA Record Asks the Minister to Accept

The EARD asserts that the Marshdale Project is compatible with Nova Scotia's climate objectives and with Canada's broader emissions-reduction commitments. It suggests that emissions associated with the Project will be mitigated or displaced through reduced operation of other fossil-fuel facilities as renewable generation increases. The EARD further implies that the Project's role as a fast-acting resource will limit its utilization and, by extension, its emissions profile over time. (EARD, project rationale and climate policy context at pp. 6–9; greenhouse gas emissions overview and conclusions at pp. 60–67).

3.2 What the EA Record Does Not Provide

For the Minister's approval purposes, the EA record does not provide sufficient information to assess whether these assumptions result in an understatement of climate impacts. (EARD, greenhouse gas emissions discussion and assumptions at pp. 60–67).

In particular, the EARD does not provide the Minister with critical information that would allow him to fully assess the climate impacts of the project. (EARD provides high-level emissions estimates but does not define an operating profile or displacement mechanism; see pp. 60–67). It omits:

- a clear operating profile showing expected annual hours of operation under different system conditions;
- analysis of how utilization may change under extreme weather events, supply disruptions, or delays in renewable build-out;
- binding, enforceable commitments demonstrating that emissions from Marshdale will be displaced by reductions elsewhere;
- cumulative emissions analysis if Marshdale operates concurrently with other proposed or existing gas-fired generation; and,
- an evaluation of how a 30-year fossil-fuel asset aligns with provincial climate obligations over its full operating life.

Instead, the EA record relies on assumptions about future system behaviour and policy alignment that are not supported by project-specific modelling or enforceable constraints. (EARD, reliance on planning context and future system evolution rather than enforceable project constraints at pp. 60–67).

3.3 Why This Results in Understatement of Climate Impacts

In the absence of a defined operating profile and enforceable displacement mechanisms, the EA record biases emissions estimates downward. It assumes limited operation and effective displacement without demonstrating either. (EARD, absence of binding operational limits or displacement commitments within the emissions analysis at pp. 60–67), and,

(EARD, greenhouse gas emissions framed in relation to policy objectives rather than worst-case or cumulative outcomes at pp. 60–67).

Because there is no legitimate commitment or mechanism proposed to reduce emissions from other power plants and / or sectors in conjunction with approving this project, the project will threaten Nova Scotia's climate goals as well as Canada's federal emissions reduction commitments under the UNFCCC and national legislation. The absence of enforceable displacement measures undermines the integrity of national emissions inventories and compliance with Canada's 2030 targets and Clean Electricity Regulations.

Where emissions could reasonably be higher, more persistent, or more cumulative than presented, the EA record does not bound impacts conservatively – it minimizes them. (EARD, emissions estimates presented without sensitivity analysis or cumulative context at pp. 60–67).

3.4 Implication for the Minister's decision

The absence of clear, enforceable, and project-specific information on how frequently the Marshdale facility will operate, under what conditions, and for how long means that the EA record systematically understates the Project's potential greenhouse gas impacts. (EARD, greenhouse gas emissions analysis and conclusions at pp. 60–67).

In these circumstances, the Minister does not have a defensible basis to approve this project based on the information provided.

4 Need for the Project

(At issue: Insufficient Information to Assess Whether the Project is Needed)

4.1 What the EA Record Asks the Minister to Accept

The Environmental Assessment Registration Document (EARD) asserts that the Marshdale Project is required to address electricity system reliability, support electrification and load growth, facilitate coal phase-out, and provide fast-acting dispatchable capacity to complement variable renewable generation.

The EARD further implies that the scale and configuration of the Project – a 300 MW dual-fuel, simple-cycle combustion facility – appropriately reflect this need and that this scale of new generation is necessary to maintain system reliability.

The Minister is therefore being asked to accept that the asserted need is both well-defined and appropriately matched to the Project as proposed.

4.2 What the EA Record Does Not Provide

For the Minister's approval process, the EA record does not provide sufficient information to assess whether the asserted need necessitates a project of this scale and type, or whether the same objectives could be met through means that would avoid or reduce potential effects within provincial jurisdiction.

In particular, the EARD does not provide :

- a clear definition of the specific reliability problem the Project is intended to solve, including the conditions under which it arises and the consequences of non-intervention;
- quantified information on the magnitude, timing, and duration of any capacity shortfall;
- an explanation of why the asserted need requires a single 300 MW facility rather than smaller, modular, or portfolio-based resources; an expected operating profile linking the asserted need to actual hours of operation and emissions; and,
- an assessment of whether the asserted need is short-term, transitional, or persistent over the Project's stated 30-year operating life.

Instead, the EA record relies on generalized references to provincial planning documents and policy objectives without incorporating the relevant analytical detail into the EA record itself.

4.3 Why This Results in Understatement of Environmental Effects

The absence of a clearly articulated and quantified need matters for the Minister's decision making role because need directly shapes the scale, duration, and interaction of potential effects within his jurisdiction.

Without understanding how often the facility will operate, under what conditions it will be dispatched, and whether alternative means could satisfy the same objectives, the Minister cannot assess whether climate, air quality, water, ecological, and cumulative effects are being presented conservatively.

Where need is defined broadly and qualitatively, and where utilization assumptions are left implicit, the EA record defaults toward lower-impact scenarios without

demonstrating that those scenarios are realistic or enforceable. This results in systematic understatement of potential effects.

4.4 Implication for the Minister's Decision

Because the EA record does not provide sufficient information to link the asserted system need to the Project's scale, configuration, and operating profile, there is no defensible basis to conclude that the Project's potential effects are unavoidable or proportionate.

Where uncertainty about need results in understatement of effects, project approval is not warranted.

5. Alternatives

(At issue: The Minister Cannot Assess Whether Environmental Effects Could Be Avoided or Reduced)

5.1 What the EA Record Asks the Minister to Accept

The EARD acknowledges that alternatives to the Project exist, including renewable generation, energy storage, demand-side management, and interprovincial imports. It asserts that these alternatives have been considered through provincial planning processes and found insufficient to meet the system's fast-acting reliability needs.

The Minister is therefore being asked to accept that reasonable alternatives have been adequately considered and that the Project, as proposed, represents the most appropriate means of meeting the asserted objectives.

5.2 What the EA Record Does Not Provide

The EA record does not provide sufficient information to evaluate these claims.

In particular, the EARD does not provide the Minister with:

- a comparative assessment of alternatives using consistent metrics, including greenhouse gas emissions, air quality, water use, land disturbance, and cumulative effects;
- modelling outputs showing how non-combustion alternatives or portfolios of alternatives would perform relative to the Project;
- an explanation of how performance requirements such as "fast-acting" capability were defined or tested against non-fossil options;
- a sensitivity analysis addressing uncertainty in storage costs, demand response potential, import availability, or transmission constraints;
- an evaluation of whether alternatives could meet the asserted need over shorter timeframes or with lower long-term impacts.

Instead, the EA record relies on conclusory statements that alternatives were considered elsewhere, without incorporating that analysis into the EA record.

5.3 Why This Results in Understatement of Environmental Effects

Where alternatives are dismissed without transparent, comparative analysis, the EA record implicitly assumes that the Project's effects are necessary rather than contingent. This assumption biases the record toward acceptance of higher-impact options by default.

In the absence of a transparent alternatives analysis, the EA record systematically understates the degree to which greenhouse gas emissions, air quality impacts, water use, habitat disturbance, and cumulative effects could be avoided or reduced.

5.4 Reliance on Off-Record Planning Processes

The EARD repeatedly relies on Integrated Resource Plans and other planning documents that are not incorporated into the EA record. As a result, the Minister is being asked to accept conclusions without access to the underlying assumptions, scenarios, or sensitivity analysis. For approval purposes, this reliance on off-record analysis prevents the Minister from independently assessing whether the Project's effects have been minimized.

5.5 Implication for the Minister's Decision

Because the EA record does not provide the Minister with sufficient information to assess whether reasonable alternatives could avoid or reduce adverse effects within provincial jurisdiction, the Project should not be approved.

6. Human Health and Air Pollution

(At issue: Reliance on Compliance-Based Modelling Masks Potential Health Effects)

6.1 What the EA Record Asks the Minister to Accept

The Environmental Assessment Registration Document (EARD) concludes that air quality effects associated with the Marshdale Project will be minor and compliant with applicable standards. It asserts that emissions will be managed through standard controls and that predicted concentrations of criteria air contaminants, including fine particulate matter (PM_{2.5}), will not result in significant adverse effects on human health.

The Minister is therefore being asked to accept that compliance with regulatory thresholds is an adequate proxy for protection of public health, and that potential exposure to PM_{2.5} and other pollutants will be limited in frequency, duration, and magnitude.

6.2 What the EA Record Does Not Provide

For approval purposes, the EA record does not provide sufficient information to assess whether potential human health effects are being understated.

In particular, the EARD does not provide:

- a project-specific human health impact assessment;

- a characterization of baseline PM_{2.5} exposure in nearby communities, including existing cumulative sources;
- an assessment of exposure during peak operating periods, start-up events, or extreme weather conditions;
- analysis of cumulative exposure where Marshdale operates concurrently with other combustion sources; and,
- an evaluation of impacts on vulnerable populations, including children, older adults, and individuals with pre-existing respiratory or cardiovascular conditions.

Instead, the EA record relies primarily on modelled concentrations under assumed operating conditions and on regulatory compliance as a surrogate for health protection.

6.3 Why This Results in Understatement of Health Effects

Fine particulate matter (PM_{2.5}) is widely recognized as a pollutant for which no safe threshold exists. Health effects occur at concentrations below regulatory standards, particularly where exposures are chronic or cumulative.

Where the EA record assumes limited utilization without enforceable constraints, relies on averaged concentrations rather than peak or episodic exposure, and does not assess cumulative exposure from multiple sources, it systematically biases health impact characterization downward.

6.4 Implication for the Minister's Decision

The absence of a project-specific human health impact assessment, combined with reliance on modelling assumptions that minimize exposure, means that the EA record understates potential human health impacts associated with PM_{2.5} and other air contaminants.

Where health risks may be greater, more persistent, or more cumulative than presented, the Minister does not have a defensible basis to approve the Project.

7. Water and Groundwater

(At issue: Understatement of Climate-Amplified Hydrologic Effects)

7.1 What the EA Record Asks the Minister to Accept

The EARD assesses surface water and groundwater effects as localized and manageable. It concludes that water withdrawals, stormwater management, and potential interactions with nearby watercourses will not result in significant adverse effects following standard mitigation and future permitting. (EARD, groundwater and surface water baseline and effects discussion at pp. 117–145; stormwater management and watercourse interaction discussion within this section at pp. 130–145).

The Minister is therefore being asked to accept that groundwater withdrawals will not affect availability or connected surface waters, that baseflow contributions to nearby streams will not be meaningfully altered, and that climate change will not materially affect water availability or hydrologic interactions. (EARD, conclusions re withdrawals, connectivity and effects management at pp. 133–145).

7.2 What the EA Record Does Not Provide

For decision making purposes, the EA record does not provide sufficient information to assess whether water-related effects are being understated. (EARD, hydrogeology, groundwater use and hydrology discussion at pp. 117–145).

In particular, the EARD does not provide: (EARD provides baseline hydrogeology and water features but limited climate-stress testing and watershed-scale connectivity analysis; see pp. 117–145, particularly pp. 133–145).

- a climate-informed assessment of groundwater availability over the Project's operating life;
- an analysis of groundwater–surface water connectivity under low-flow or drought conditions;
- an evaluation of cumulative water withdrawals within the watershed; and,
- an assessment of how climate change may amplify hydrologic stress or variability; quantified analysis of baseflow contributions to downstream aquatic systems.

Instead, the EA record treats water resources largely as static systems assessed under present-day conditions. (EARD, present-condition framing of hydrology and groundwater discussion at pp. 117–145).

7.3 Why This Results in Understatement of Water-Related Effects

Climate change is expected to alter precipitation patterns, increase the frequency of droughts, and intensify hydrologic variability. In this context, assessments that rely on current conditions risk understating future impacts. (EARD acknowledges climate context but does not provide climate-informed hydrologic stress testing in groundwater/withdrawal analysis; see pp. 117–145).

Where groundwater withdrawals are assessed without stress-testing under climate scenarios, evaluating cumulative demand, or accounting for hydrologic connectivity, the EA record minimizes the likelihood and magnitude of downstream effects, including effects on fish habitat and aquatic ecosystems.. (EARD, groundwater withdrawal and effects discussion at pp. 133–145).

7.4 Deferral to Future Permitting

The EARD repeatedly defers detailed water-related analysis to future permitting processes. (EARD, permitting/approvals and monitoring commitments for water resources at pp. 140–145).

If key uncertainties about water availability, connectivity, and climate amplification are unresolved at the approval stage, the Minister is being asked to assume that future processes will manage risks that have not yet been characterized.

7.5 Implication for the Minister's Decision

The absence of climate-informed, watershed-scale water analysis means that the EA record understates potential water-related impacts that could interact with fish habitat and aquatic ecosystems. (EARD, groundwater/surface water analysis and conclusions at pp. 117–145).

8. Wetlands and Terrestrial Habitat

(At issue: Area-Based Assessment Understates Functional and Landscape-Scale Loss)

The EA record characterizes wetland and terrestrial habitat impacts primarily by area and mitigation intent, without evaluating ecological function, landscape context, or cumulative loss in a region already subject to historic wetland depletion. The absence of functional assessment, connectivity analysis, and demonstrated compensation equivalency results in an understatement of ecological effects. This prevents the Minister from determining whether residual impacts to wetlands and associated habitat may be more significant, persistent, or less reversible than presented.

8.1 What the EA Record Asks the Minister to Accept

The Environmental Assessment Registration Document (EARD) identifies wetlands and terrestrial habitats within and adjacent to the Project Area and concludes that impacts will be localized, manageable, and capable of mitigation or compensation. It treats wetland effects largely in terms of mapped area and proposes future compensation to address residual loss.

The Minister is therefore being asked to accept that:

- wetland loss is limited and not functionally significant;
- remaining wetlands are replaceable through compensation;
- terrestrial habitat effects are minor and confined to the Project footprint; and,
- broader landscape context does not materially affect significance.

8.2 What the EA Record Does Not Provide

The EA record does not provide sufficient information to assess whether wetland and habitat impacts are being understated.

In particular, the EARD does not provide the Minister with:

- a functional assessment of affected wetlands, including roles in groundwater recharge, baseflow maintenance, flood attenuation, and water quality regulation;
- an analysis of wetland connectivity at the watershed or sub-watershed scale;
- information on historic wetland loss in the region and its relevance to residual ecological capacity;
- identification of proposed compensation locations or demonstration of functional equivalency; and,
- an assessment of time lags between wetland loss and any restored function.

Instead, wetland impacts are characterized primarily by area and mitigation intent, without sufficient evaluation of ecological function or cumulative loss.

8.3 Why This Results in Understatement of Ecological Effects

In landscapes where historic wetland loss has already reduced ecological resilience, remaining wetlands often play disproportionately important functional roles. Assessments that focus narrowly on area lost, without accounting for function or landscape context, tend to understate ecological effects.

This matters because wetlands:

- mediate surface water and groundwater interactions;
- support downstream aquatic ecosystems;
- influence habitat availability for endangered species; and
- contribute to climate resilience.

Where wetland compensation is proposed but not specified or evaluated, the Minister is being asked to assume future success without evidence that equivalent functions will be restored.

8.4 Implication for the Minister's Decision

The absence of functional wetland assessment and reliance on undefined future compensation means that the EA record understates the ecological significance of wetland loss and habitat alteration.

Where wetland and habitat effects may be greater, more persistent, or less reversible than presented, the Minister does not have a defensible basis to approve the Project..

9. Species at Risk

(At issue: Understatement of Functional Habitat and Cumulative Pressure)

9.1 What the EA Record Asks the Minister to Accept

The EARD identifies species listed under the *Endangered Species Act*, that may occur within the broader Project Area. It concludes that effects will be limited, mitigable, and not significant. (EARD, species at risk and migratory birds baseline surveys and screening at pp. 210–238; migratory birds discussion at pp. 240–255).

The Minister is therefore being asked to accept that:

- species presence is limited or incidental;
- habitat loss does not affect population viability;
- disturbance effects are temporary and localized; and
- cumulative pressures on already stressed species are negligible.

(EARD, effects characterization and significance conclusions for wildlife and birds at pp. 228–238, 245–255).

9.2 What the EA Record Does Not Provide

For approval purposes, the EA record does not provide sufficient information to assess whether effects on endangered species are being understated. (EARD, methodology for species screening and effects assessment at pp. 210–238).

In particular, the EARD does not provide the Minister with:

- functional habitat assessments for listed species beyond presence/absence determinations;
- an analysis of indirect effects, including habitat fragmentation, hydrologic change, and disturbance;
- an evaluation of seasonal use;
- an assessment of cumulative habitat loss across the region; and,
- consideration of climate-amplified stressors interacting with Project effects.

(EARD relies on presence/absence surveys and distance-based screening; see pp. 214–220, 226–232; limited indirect/cumulative effects analysis at pp. 233–238).

Instead, the assessment relies heavily on screening by distance, survey timing, and footprint. (EARD, emphasis on footprint-based and survey-based screening at pp. 214–232).

9.3 Why This Results in Understatement of Wildlife Effects

For endangered species, effects are often driven not by direct mortality alone, but by loss of functional habitat, disruption of ecological processes, cumulative disturbance, and

reduced resilience under climate change. (EARD does not assess functional habitat loss or population-level effects; see pp. 226–238, 245–255).

Where assessments focus narrowly on site-specific presence and immediate effects, they tend to understate impacts on populations already subject to multiple stressors.

9.4 Implication for the Minister's Decision

The absence of functional habitat analysis and cumulative effects assessment for species at risk and migratory birds means that the EA record understates the likelihood and significance of adverse effects within his jurisdiction. (EARD, wildlife and birds effects conclusions at pp. 233–238, 245–255).

10. Atlantic Salmon and Cold Water Species

(At issue: Fragmented Aquatic Assessment Masks System-Level Fisheries Effects)

10.1 What the EA Record Asks the Minister to Accept

The Environmental Assessment Registration Document (EARD) acknowledges the presence of Atlantic salmon and other cold-water aquatic species within the broader watershed but concludes that the Project will not result in significant adverse effects on fish or fish habitat. This conclusion is based largely on the Project's distance from mapped salmon habitat and the assumption that localized mitigation measures will prevent downstream effects.

The Minister is therefore being asked to accept that:

- groundwater withdrawals and surface disturbances will not affect downstream cold-water systems;
- baseflow contributions to salmon-bearing streams will remain intact;
- Project-related effects will not interact meaningfully with climate-driven stressors; and,
- any remaining uncertainty is negligible for approval purposes.

10.2 What the EA Record Does Not Provide

For the Minister's approval process, the EA record does not provide sufficient information to assess whether effects on salmon and cold-water systems are being understated.

In particular, the EARD does not provide him with:

- watershed-scale analysis linking groundwater withdrawals to surface water flow and temperature;
- an assessment of baseflow dependence for downstream salmon-bearing streams;
- an analysis of how drought, low-flow conditions, or elevated temperatures may amplify Project-related stress; and,

- an evaluation of cumulative stressors affecting salmon populations within the watershed.

Instead, the assessment relies primarily on screening by proximity rather than on hydrologic and ecological connectivity.

10.3 Why This Results in Understatement of Effects

Atlantic salmon and other cold-water species are highly sensitive to changes in groundwater-supported baseflow and stream temperature. Even modest hydrologic alterations can have disproportionate biological consequences, particularly under warming climate conditions.

Where assessments do not evaluate watershed-scale processes, they tend to understate risks to fish habitat protected under the federal *Fisheries Act*.

10.4 Implication for the Minister's Decision

The absence of watershed-scale, climate-informed analysis means that the EA record understates potential effects on salmon and cold-water aquatic systems.

Where fish and fish habitat effects may be greater, more persistent, or more cumulative than presented, the Minister does not have a defensible basis to approve the Project.

11. Cumulative and Regional Effects

(At issue: Understatement Through Piecemeal Scoping)

11.1 What the EA Record Asks the Minister to Accept

The EARD assesses cumulative effects within a limited spatial and temporal scope and concludes that cumulative impacts will not be significant. It treats the Project largely as an isolated undertaking, with cumulative effects considered only in relation to a narrow set of existing activities. (EARD, cumulative effects methodology and scoping discussion at pp. 38–45; cumulative VC conclusions repeated across VC chapters, e.g., air quality pp. 84–87; wetlands pp. 150–165; wildlife pp. 228–238).

The Minister is therefore being asked to accept that:

- cumulative effects are minimal;
- interactions with other proposed or foreseeable projects are limited; and,
- broader regional or system-level effects do not warrant further assessment.

(EARD, cumulative effects significance conclusions across VC sections at pp. 38–45 and within individual VC chapters).

11.2 What the EA Record Does Not Provide

For approval purposes, the EA record does not provide sufficient information to assess cumulative effects at a scale commensurate with the Project's potential impacts. (EARD, cumulative effects scoping framework at pp. 38–45).

In particular, the EARD does not provide the Minister with:

- an analysis of cumulative greenhouse gas emissions from multiple gas-fired facilities proposed in the region;
- an assessment of cumulative air quality and PM_{2.5} exposure;
- an evaluation of cumulative water withdrawals and wetland loss;
- an integrated assessment of cumulative stress on species at risk and migratory birds; and,
- consideration of climate change as a cumulative effect amplifier.

(EARD does not integrate cumulative GHG, air quality, water, habitat, and species effects across projects; see cumulative framework pp. 38–45 and VC-specific chapters throughout).

Instead, cumulative effects are constrained by scoping choices rather than by evidence demonstrating that broader effects are unlikely. (EARD, scoping choices limiting cumulative effects to narrow spatial/temporal bounds at pp. 38–45).

11.3 Why This Results in Understatement of Environmental Effects

Cumulative effects are, by definition, more likely to be understated when projects are assessed in isolation. Where multiple stressors interact—climate change, habitat loss, pollution, and hydrologic alteration—the combined effect may be greater than the sum of individual components. (EARD acknowledges multiple stressors but does not integrate them analytically; see pp. 38–45 and VC chapters).

11.4 Implication for the Minister's Decision

Because cumulative effects are scoped narrowly rather than assessed comprehensively, the EA record understates the Project's contribution to regional and system-level effects. (EARD, cumulative effects conclusions at pp. 38–45).

12. Deferral to Future Permitting

(At issue: Reliance on Unexamined Assumptions)

12.1 Pattern of Deferral in the EA Record

Across multiple issue areas—including air quality, human health, water resources, wetlands, species at risk, migratory birds, and cumulative effects—the EARD defers detailed analysis to future permitting and approvals. This deferral is framed as reassurance that risks will be managed later. (EARD, repeated reliance on future

permitting and monitoring commitments across VC chapters, including air quality pp. 84–87; water resources pp. 140–145; wetlands pp. 150–165; wildlife/species pp. 228–238; fisheries/aquatic pp. 304–328).

12.2 Why Deferral Matters at the Approval Stage

For approval purposes, deferral is not neutral. If impacts are not fully characterized, mitigation measures are not specified or tested, and uncertainty is resolved only after approval, the Minister is being asked to rely on assumptions rather than evidence. (EARD, framing of mitigation and effects management as future permitting conditions across VC chapters, see pp. 84–87, 140–145, 150–165, 228–238, 304–328).

Deferral tends to bias the EA record toward understatement, as unresolved risks are treated as manageable by default. (EARD, cumulative reliance on post-registration permitting, monitoring, and adaptive management commitments rather than upfront analysis).

12.3 Implication for the Minister’s Decision

Where key uncertainties are deferred rather than examined, the Minister does not have a defensible basis to approve the project when the potential effects are insignificant or adequately understood. (EARD, deferral of unresolved risks to future approvals across multiple VC sections).

13. Conclusion

Taken together, the issues identified in this submission do not reflect isolated gaps, but a consistent pattern in the EA record. Across issue areas, potential adverse effects are assessed using unbounded assumptions, fragmented analysis, and deferred decision-making, rather than conservative, integrated, and enforceable evaluation. Effects are considered in valued component silos rather than through a system-level lens, alternatives are acknowledged but not tested, and critical uncertainties are deferred to future permitting.

The Minister’s role is not to accept assertions made in the EARD at face value, but to assess whether the proponent has demonstrated that the designated project is justified, considering its environmental, health, and climate impacts.

The question before the Minister, then, is whether the Project’s full range of potential effects is sufficiently understood to justify its approval. On the record before the Department, that threshold has not been met.

As demonstrated throughout this submission, the EARD relies on asserted need rather than demonstrated necessity, dismisses reasonable alternatives without comparative analysis, understates fossil fuel lock-in and lifecycle greenhouse gas emissions, and treats human health, wetlands, water, species at risk, and climate change as discrete issues rather than interacting system-level risks.

Approving the Marshdale Project at this stage would pre-judge questions that go to the heart of the public interest, including climate compatibility, cumulative environmental degradation, long-term human health risk, and Nova Scotia's responsibilities with respect to biodiversity and fish habitat.

For these reasons, Sierra Club Canada Foundation respectfully recommends that the Minister not approve the Marshdale Project.

The Minister is also being asked to assess a second proposed gas-fired plant at Salt Springs. Because of the interconnected nature of the impacts of these plants (i.e.: the need for, project description, scale, scope, impacts, and cumulative impacts), we further recommend a joint assessment for these plants.

Appendix A: Key Record References (EARD)

Section	Issue Area	Key EARD Pages Cited
Section 3	Climate Change & GHG Emissions	pp. 6-9; 60-67
Section 4	Project Need	pp. 3-4; 20-21; 25; 73
Section 5	Alternatives	p. 25; p. 73
Section 6	Human Health & Air Pollution (PM _{2.5})	pp. 12; 68; 84-87
Section 7	Water & Groundwater	pp. 117-145; 130-145
Section 8	Wetlands & Terrestrial Habitat	pp. 123-129; 150-165
Section 9	Species at Risk & Migratory Birds	pp. 210-238; 240-255
Section 10	Salmon & Cold-Water Aquatic Systems	pp. 134-136; 304-328
Section 11	Cumulative & Regional Effects	pp. 38-45; VC chapters
Section 12	Deferral to Future Permitting	pp. 84-87; 140-145; 150-165; 228-238; 304-328

Environmental Assessment - Project Comments

Submission ID

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SUBMITTED



All comments received from the public consultation will be posted on the department's website for public viewing, following the necessary redactions of personal information in accordance with the Freedom of Information and Protection of Privacy Act.

By submitting your comments to the Department, you are consenting to the posting of your comments on the department's website.

The name, email address, and contact information of people who submit comments on behalf of an organization, such as a community group, business, or non-government organization (NGO) will be included with their comment posted on the website.

The name, email address, and contact information of individuals will be removed before their comments are posted on the website.

Privacy Notice

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We collect and use your personal information to administer the environmental assessment review process, to verify comments, and to assess the project's proximity to you.

We may only use or disclose your personal information for another purpose if we are authorized by law to do so, or if we obtain your consent.

By submitting your personal information to us, you acknowledge that the information provided to us is correct and accurate, and you understand that any personal information you provide is collected, used, and disclosed for the purpose of administering the review process.

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

February 09, 2026

Public Comment on NS Project Environmental Assessment:

Re: Fast Reacting Fossil Fuel Gas power plants

- comment to both [1] Saltspring, NS and [2] Marshdale, NS

[1] NO to new fossil fuel power plants -there should be no approval to using combustion carbon fossil fuel technology due to the fossil fuel combustion air pollution and increased carbon accumulative impacts over the proposed 30 years - we need change and we have a clean tech option

[2] NO to the location and concept model - while fast reacting power plants on demand are needed for grid balance the should be decentralized and distributed along the grid and clean technologies that do no release air pollution or carbon emissions

[3] Agriculture and local food security relies on rural lands air and water --so it is not the place to construct brand new fossil fuel combustion power plants to release small

Particulate matter pollution.

[4] Current Federal and Provincial laws set a path to mitigate carbon emissions and shift to clean energy supply – so with real options - an approval would not comply with the mandate of our laws.

===What we need to do ===

More Wind and more solar and more grid scale batteries distributed along the grid.....plus now is the time to deploy Canadian made fast reacting Hydrogen PEM Fuel Cells ...clean power to meet demand supply and balance the power grid.

TO BE CLEAR -- NO to the fossil fuel GAS Plants -- based on the impacts of pollution and carbon release.

So...PLEASE deny the project the Environment Assessment --- and Please CONSIDER the options and opportunity to deploy fast reacting clean tech power plants that do not pollute and align with Canadian laws and pollution goals to protect our environment and health and our economy as discussed here:

=== the Options ===-

..NOTE those loyal to Texan oil cartel empire plan a gas plant is in NB.....and now NS – half regulator and grid system controller and half independent energy system operator association non profit ?????? --huh??? --NS IESO --is “now ” acting as proponent and back room deal speed and wants to get approval for same fast reacting fossil fuel carbon pollution power plants here in Saltsprings and Marshdale- both in Pictou County NS..... and then sell it to a private operator????,,using our tax dollars to do so???---- an oil cartel loyal game play that is as it appears.....up to 300MW plant in each place.....after oil loyal NSPOWER failing to procure cheaper wind power for over a decade since Comfit eradevelopers plans shelved back then...until the Hydrogen hype from water to ship to EU markets...now we be gettin wind built...but Houston and the oil cartel still want to sell oil and gas and monetize known reserves and pollute us all ...so.....SHAME on the DELAY and ongoing air pollution our youth and natural world must endure...and they want to approve more pollution????..for the oil cartel loyal – say NO.

---so...not sure if NS Assembly of Chiefs and KMKNO team or Pictou Landing team have been consulted at all...

---the NS Assembly of Chiefs should say No to these proposed Pictou County NS gas combustion power plants --but then advocate for a clean technology option ---an option for 'standby on demand fast reacting power supply" --- which is what the provincial energy strategy says is needed to meet supply demand as we shift to mostly Wind and Solar as well as Storage Batteries....

--the option which is correct - was discussed in NS Energy Strategy itself are -- Hydrogen PEM Fuel Cells a zero carbon fast reacting standby power plant... ..so why now Oil Cartel multi-generator gas plants and one other project planned in NB too!!.....more lies and delays as they cling to drilling and monetizing oil and gas reserves and all of it controlled by the OIL CARTEL...

---so instead of Gas plants -- the Assembly could demand NS buy Canadian clean tech like the Germans are doing--- our World Leader - the Germans and EU and others buy Canadian - Ballard Power Systems of BC - Hydrogen Proton Exchange Membrane Fuel Cells -- stationary power plants for Grid or Building scale or for buses trains etc----no combustion, .no spark no carbon....instead Hydrogen Gas is pulled through a membrane to join with oxygen which forms pure clean water vapour while the Fuel Cell produces an "electrochemical current" -- a clean source of electricity ..on demand....much more Fast reacting...zero pollution...clean electricity.

NS is building Wind....with proposed Hydrogen Production Plants....but that 'electrolyser tech is expensive.....there is a better more economical process to produce the greenest hydrogen gasclean hydrogen from pollution....like Waste we now landfill... or industrial effluents or even emissions,

--NS has 18 municipal owned Landfills plus others by industry....be it noted that the Germans and EU are now recently contracting "other Canadian CleanTech" to process

industrial society Waste instead of landfilling which will restructure elements of waste and produce useful products for circular industrial supply chains, such as Hydrogen Gas - that tech is an Electric powered Plasma Torch Thermal Processing Waste Restructuring Plant -- the waste gets zapped to gaseous state where base elements separate and can be recovered and restructured to useful materials --Hydrogen Gas, and solid Carbon material, and some metals are streamed off, and the rest is cooled to an inert slag rock for aggregates markets - inert meaning you can use it is a fish tank and the rock will not leachate elements to the water Aggregates and metals and carbon all have markets....and the Hydrogen Gas is for Ballard Power Fuel Cells – the developed clean tech to supply Fast Reacting on demand power plant to meet Grid supply demand.

---win win win--- problem solving option --- no fossil fuel gas plant not needed since we have Hydrogen Fuel Cells ----no need to frack NS or extract oil globally any longer than needed ----no landfilling waste and releases of other pollution since we can process it to restructured recovered resources .and for energy supply too...PLUS it is paid for by selling Hydrogen Gas and products from waste as well as the cost of current waste and pollution disposal and mitigation...towards zero pollution release.—the economic cost of not pollution - versus the infinite increasing cost of pollution – we need closed loop industrial processes, circular industrial supply and decarbonized energy – not new fossil fuel gas plants approved for 30 years.

---Hydrogen Fuel Cells are scaled and distributed along the Grid – since industrial waste can be processed at a landfill that means more landfilling - so put the Fuel Cells at the 18 Landfills -Plasma Torch Waste Restructuring Plant then pipes Hydrogen Gas to the tank...and the Fast Reacting Fuel Cells can ramp to full power in mere seconds or off again at strategic locations along the Grid.....close to where the grid needs to meet demand.....the German Grid model ...and now they also plan to process the methane at landfills and the new solid waste to stop landfilling to make Hydrogen Gas for their power Grid supply demand and for ev fuel cell motive power for buses and Trains....Mercedes Citaro Buses started selling test pilot buses to global transit fleets in 1999 and they and Ford were both Major shareholders in Ballard Power Systems of Canada --- buy Canadian...

----so since NS and others are problem stretching gas ---- they need regulatory direction to a modern more harmonious with nature pollution solving option and a strong NO on a new Gas plant project.

--the Oil loyal drillheads on the gravy train dont give up

---so... I hope the Chiefs of NS look at partnerships and opportunities to invest in our future and can move forward problem solving clean tech progress for a harmonious more civilized power supply ----and bring us out of the Premier Houston dark ages of barbaric polluting oil cartel gas plants.

--- Take note on Fuel Cells and hydrogen -- the US granted \$94 million last year to Ballard Power Systems to attract a new giga-factory for fuel cells production in Rockwell Texas... but now that is delayed by policy changes of the current administration-- drill drill drillheads...and delays by lies

--- so say NO to any approval for 30 years of fossil fuel combustion emissions “air pollution and carbon impacts” at both proposed gas plants in NS [and one in NB], based on the health and climate impacts.

--- and say No to Nuke Plants in Ontario – instead wake up and talk Ballard into building the NEW Fuel Cells in Canada -- a new giga factory global export plant in Ontario and expanded BC facility And then order 1200MW plus for Ontario Fuel Cells and shutter the 1200 MW of planned GE Hitachi Small Nukes planned to be built in one central plant place ...no – deploy our Fuel Cells – and drive economy of scale for sales of Fuel Cells to EU and global markets == stationary and motive energy supply

---then for NS --order 600 MW of Fuel Cells for NS....and distribute them to all 18 landfills ...and stop landfilling and use Plasma tech to make the Hydrogen gas on site... Fast Reacting Hydrogen PEM Fuel Cells.....the same ones the EU and Germans and others are integrating for clean power...

--wake NS ECC and federal IAACthis gas plant plan is a new delay by the oil

cartel....they love to pollute our families and any approval does not align with our carbon and pollution goals

--say NO to gas plants and I and others hope the CHIEFS say No too.

--stop polluting us all and our Earth.

--oh and how does the carbon emissions get captured at these new state of the art small multigenerator fast power plants....or do they plant to capture any carbon emissions??

-- Please Note - Plasma Torch Process is a cheaper way for Pathway Alliance to do the Carbon capture MPO project which is also a source of waste to hydrogen gas supply --So.. we need to partner and to fund and support the deployment of Plasma Torch Thermal "emissions" Processing systems at the target Carbon Capture project oil processing facilities, for Alberta and for other facilities for Methane emissions reductions elsewhere. Note - if the oil industry uses steam reformation to process the captured hydrocarbon emissions now pressure vented and flared during oil and gas processingthey then need to store the CO2 formed while getting the hydrogen gas to sell...which is a major cost for storing CO2 and a pipeline --.HOWEVER -- if they use the patented Hydrocarbon emissions Plasma Torch process developed and patented by Pryrogenesis of Canada who is stepping out as the world leader - then that plasma process produces hydrogen gas and also solid carbon material is recovered for markets.....meaning there is no CO2 produced that needs stored and delivered to a major underground storage system via a major CO2 pipeline....

--NOTE - and those oilsands tailings can all be processed via closed loop clean tech - and including plasma processes --solids - emissions -effluents-.

===Canada has an opportunity here ===

--mass production scale factory of Ballard Fuel Cells new plant in Ontario.....and for the long waiting viable clean hydrogen supply --support mass production- and deployment--selling globally -- and buying our own Canadian Clean tech HERE in NS and NB for fast reacting fuel cells ...not Fossil fuel turbines and pollution impacts or the Nuke Plants in Ontario.

---then we take manhattan ...then berlin. - oh right .the Germans already plan to use our plasma tech to make hydrogen from industrial waste...so.. deploy our solutions to pollution

--say no to gas plants...and yes to progress...fuel cells and plasma tech processes are ready....stop pollution releases-solids - emissions - effluents-selling restructured waste to useful products such as hydrogen gas for Fuel Cells—we invest in closed loop industrial processes - circular industrial supply waste to resources - we mine our pollution for resources - and stop releases of pollution

--change can require regulatory motivation to lead investment

===Pollution - carbon imbalance - Climate impacts-- habitat losses to industry - Biodiversity loss==

==Canadian legal mandates to protect a healthy environment and meet climate goals===

===say NO to approvals for fossil fuel gas plants based on the 30 years accumulative pollution impacts - ===we have Options - clean tech solutions to pollution...we mine our pollution for Hydrogen and elemental resources towards zero pollution releases

--30--

Submitted Feb 9,2026

Name:

Email:

City/Town

Truro, NS

Postal Code

— — —

Attachment(s):

Drag & drop or [choose file](#) to upload

Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls, xlsx

Maximum number of files allowed: 10

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

The Ecology Action Centre is concerned about the development of the proposed Marshdale Gas plant.

These gas plants will not support decarbonization and ultimately limit environmental progress. Our comments are based upon the EA Registration Documents for the proposed project Marshdale.

- 1) The proponent – IESO – is a non-for profit responsible for the planning and reliable operation of Nova Scotia’s bulk electricity system. Whereas the purpose of EA is to promote sustainable development by protecting and conserving the environment, the EAC seeks to identify and assess adverse effects on the environment. The involvement of NGOs and the general public is crucial to achieve this goal, and the EAC appreciates the opportunity to engage with the IESO on the construction of gas plants. The Proponent’s Guide to Environmental Assessment notes that “in certain circumstances, special consultations may be held with First Nations.” The EAC urges the proponent to engage in the aforementioned special consultations given the relative proximity of both projects to Pictou Landing First Nation, and the history of environmental racism in Nova Scotia. Nova Scotia environment minister Iain Rankin has referred to decades of effluent dumping in Boat Harbor as one of the worst cases of environmental racism in Canada, and it is important that both the proponent and the Department of Environment and Climate Change (NSECC) ensure that the consultation process for the EA is perceived as legitimate by the general public and Mi’kmaq people specifically. Every opportunity should be taken to consult with First Nations, and we strongly believe special consultation is warranted as the part of this EA process.
- 2) In section 3.3.2.3 Freshwater, pg 19, it states that “A sustainable groundwater supply will be required for power plant operation. Preliminary desktop investigations estimate a peak raw water consumption of 175 m³/hr and average annual consumption of 23 to 31 m³/hr based on the expected power plant operation.” Both the 2022 and 2025 Climate Change Risk Assessments identify increased risk of drought, and less snow and water in the coming decades, which may reduce the availability of fresh water. These risks – along with rising water rates exacerbated by industrial demand on local water supplies – could harm residential access to water. The gas plants require 24/7 operation, and the resulting water usage could further increase the risk of drought, while decreasing local capacity to respond to wildfires.
- 3) Section 3.5 Project timelines. According to S&P Global, overall demand for gas plants has increased sharply – driven by AI, as well as demand in other sectors. Wait times are as

- 4) much as seven years in the US, and costs are up 2.5 percent in some US markets¹. The EAC questions the feasibility of timeline for construction and operation of both gas plants presented by the proponent, and is concerned about the impact of potential delays and rising costs on consumers. Nova Scotia's clean power plan calls for the development of 300MW of Battery Storage, noting that battery prices haven't fallen by 95% in recent decades and that Nova Scotia is also home to world-class expertise in batteries, and rapidly growing new firms specializing in Battery Energy Storage Systems (BESS). The proponent's Request for Expressions of Interest (REOI) for fast-acting power generation imposed unnecessary limitations on the type of generation requested – namely simple cycle, fast acting, combustion turbine package – when other forms of dispatchable generation could provide the same benefits to the grid with a lowest risk of delays and cost overruns, GHG emissions produced as a result of the operation of both gas plants are subject to Nova Scotia's output-based pricing system (OBPS) as each facility exceeds 50,000 tCO₂e, with associated costs passed on to ratepayers. The projects will be subject to emissions limits under the Clean Electricity Regulations, diminishing associated system benefits and reliability benefits for ratepayers, particularly when compared to other forms of dispatchable generation such as BESS projects
- 5) Issues with Section 7 under Mitigation pg. 91. The EAC is skeptical about the feasibility of producing renewable natural gas. No fossil fuel can become renewable, nor can it become low carbon. Advertising fossil fuels as such is misleading, coercive and greenwashing. Carbon capture storage (CCS) only buries carbon eliminating it from the atmosphere and is not an effective long term solution as continuing to do so will cause further waste and overcrowding to existing land mass due to domination by CCS facilities.
- 6) In Section 9.2 – Wetlands - If a wetland meets the criteria for a potential WSS it should not be altered. This includes WL4 at the Marshdale site (potential WSS).
- 7) In Section 10.3 – Terrestrial Fauna - The proponent should also create a Wildlife Management Plan in cooperation with NSNR which includes plans to respond to moose sightings on site.
- 8) In Section 10.4 – Avifauna - Mitigation measure should include avoiding the destruction or disturbance of habitat for the SAR bird species observation on site. The known and predicted habitat of these SAR-listed species at the site should be avoided as per SARA (and the Migratory Birds Convention Act).

¹ <https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply>

- 9) The EAC communicated our preference for a technology neutral REOI at a meeting in December. This sentiment is reflected in our comments as well. We would like to note that it was unclear to EAC staff that their request for a meeting with the EAC was understood by the proponent as a component of their engagement for the proposed gas plants.
- 10) The application for 2 gas plants of 300MW each indicates an overbuild of gas larger than what was defined in the clean power plan (300MW). There is no indication of retrofitting existing assets to meet dispatchable energy needs. The Clean Power plan indicates that only 300 MW of New dispatchable power generators be added to meet the 2030 goal. These plants do not include the pre-existing 450 MW of oil/gas that is said to be included in the plan. This is in addition to 100MW to be received in a new deal for a portion as new gas peaker plant output recently announced with New Brunswick Power. Overbuilding of gas generation would be ineffective, inefficient, and environmentally damaging, and costly, especially when there are lower carbon alternatives. The dash to gas risks negative and unnecessary impacts on the environment and on ratepayers. Similarly, EAC is skeptical of the feasibility of sustainable hydrogen and forestry biomass use as a fuel input for these gas plants. The US Department of Energy² estimates that the maximum amount of hydrogen can be blended and carried in natural gas pipelines is theoretically 15%, and the EAC is concerned that plants will lock in emissions with little chance of GHG reduction as a result of hydrogen blending.
- 11) Section 2 . EAC would like to reiterate that batteries and battery storage have not been adequately evaluated as a viable low carbon alternative to the proposed gas plants. The REOI does not address battery storage as a dispatchable energy resource. Unlike gas, BESS plants would not be subject to OBPS or volatility in the price of fuel inputs and will be integral to deployment and integration of intermittent renewable energy resources in Nova Scotia – including offshore wind. Similarly, there are pre-existing shovel ready projects. In the Pictou County region Mi'kmaq majority-owned, shovel-ready 150 MW/600-1,200 MWh BESS exists in Trenton. The EAC is concerned that the deployment of these gas plants will undermine this business case for the deployment of these BESS plants, and that competitive procurement based on a technology neutral REOI would provide better value to ratepayers while adhering closely to the Nova Scotia Clean Power Plan.

² [Hydrogen Pipelines | Department of Energy](#)

Environmental Assessment - Project Comments

Submission ID

464c1845

Submission Date

09/02/2026 23:21

Submission status

SUBMITTED



All comments received from the public consultation will be posted on the department's website for public viewing, following the necessary redactions of personal information in accordance with the Freedom of Information and Protection of Privacy Act.

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The name, email address, and contact information of people who submit comments on behalf of an organization, such as a community group, business, or non-government organization (NGO) will be included with their comment posted on the website.

The name, email address, and contact information of individuals will be removed before their comments are posted on the website.

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We collect and use your personal information to administer the environmental assessment review process, to verify comments, and to assess the project's proximity to you.

We may only use or disclose your personal information for another purpose if we are authorized by law to do so, or if we obtain your consent.

By submitting your personal information to us, you acknowledge that the information provided to us is correct and accurate, and you understand that any personal information you provide is collected, used, and disclosed for the purpose of administering the review process.

To read more about how government respects your privacy when interacting with us, review our full [privacy statement](https://beta.novascotia.ca/privacy) (<https://beta.novascotia.ca/privacy>). For questions about how your personal information is handled by the program, you may contact us at 902-424-3600 or ea@novascotia.ca (<mailto:ea@novascotia.ca>).

Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

I have mixed feeling about these natural gas plants. I would prefer no fossil fuels but when it's a huge difference compared to coal and the timeline involved, it's hard to argue. However, there are significant concerns that I don't feel have been properly addressed/researched yet to make an informed decision if you're the government that is, anytime soon. I know we're under the gun for 2030 but we have to get this right if it's going to be done here and or in Salt Springs. I will copy and paste a document that I wrote-up and had touched-up a bit by AI for reading clarity:

Marshdale Natural Gas Plant – Community and Environmental Concerns

In regard to water:

Summer 2025 produced a significant drought in our area. The East River flowing through Stellarton was so low that rocks were visible above the water — something I cannot recall seeing in my 39 years living here. We experienced several consecutive weeks without rain.

Drilling is taking place at depths of approximately 500 metres. Based on publicly available information, it is unclear where groundwater at this depth ultimately discharges. Water must flow somewhere. Even in the absence of a known surface stream or conduit leading from the proposed site to the East River, subsurface connections cannot be ruled out. Has any groundwater tracing or monitoring (for example, tracer studies) been considered to determine where this water ultimately ends up?

The water used at the site is converted to steam. Can this steam be captured, condensed, and reused — for example, to support or restore nearby marshes?

Even if groundwater is accessed at depth, removing this volume of water daily over decades raises concerns about long-term impacts that may not be immediately apparent. I hope contingency plans exist to address unforeseen consequences. The surrounding natural environment and nearby communities depend on careful, precautionary planning.

Is it confirmed that this groundwater source can reliably sustain the required flow rate 24 hours a day, year-round, for the next 30 years? If this water supply becomes constrained in the future, does this pose a risk of creating a stranded asset?

Regarding the controlled release of treated water:

Could this water be used to create or enhance marshes within the immediate area or elsewhere in Pictou County? Restoring wetlands outside the county to meet regulatory requirements does not feel equitable. If wetlands are impacted locally, restoration should occur locally whenever feasible, particularly since migratory birds return to specific areas for ecological reasons.

Will a detailed environmental assessment be conducted specifically on the release of treated water into the surrounding environment?

If monitoring later shows that nearby wetlands are being dried or altered as a result of groundwater withdrawal, what mitigation measures would be implemented?

In regard to birds:

The Environmental Assessment appears to focus primarily on the project footprint. It does not adequately assess adjacent properties, nearby roadways, or the broader surrounding area.

American Bittern are known to nest in the large wetland along the train tracks near Lorne Station Road, which falls within the emissions modelling area. Migratory birds reaching this marsh must fly through the affected airspace and will be exposed to both emissions and noise.

I propose that night-time operations be restricted during peak migration periods when birds are known to be actively migrating.

Birds in this area are widespread — not limited to one marsh. Along Culloden Road and Stellarton Trafalgar Road, for example, birds line thickets, trees, and adjacent farm fields. Many have migrated from Central America, South America, and the southern United States. These species rely on acoustic cues and clean air to locate breeding and staging habitat. Many can hear high- and low-frequency sounds beyond human perception, yet the noise model appears to be based on human thresholds.

I am concerned about construction and operational noise interfering with birds' and mammals' ability to communicate for breeding and rearing young.

Why were passive monitoring tools such as Audiomoths or radar not used to monitor birds continuously, day and night? Bird activity varies by species and time of day. For example, American Bittern typically vocalize shortly after dawn. Limited site visits cannot capture this complexity or adequately assess areas beyond the project boundary.

Why was the Nova Scotia Bird Society not contacted to help connect with local birders who know the area well? I, and others, would have volunteered to assist with counts.

Additional questions:

Will emissions be released at a height designed to minimize disruption to typical bird migration altitudes?

Will stacks be shut down at night during peak spring and fall migration periods?

Why does the EA reference “migrating geese” when Canada Geese are present year-round in Pictou County?

Will tailing ponds be covered to prevent bird access?

Will sound cannons be avoided entirely?

I do not see my eBird records — or those of other local observers — being used, despite documented sightings of Common Nighthawks, Black-billed Cuckoos, warblers, and many other species within the emissions zone. No surveys appear to have been conducted on neighbouring properties, and ground vibration effects on nearby wetlands were not addressed.

In regard to amphibians:

Will amphibians be collected and relocated to nearby suitable habitat, or is there a risk they will be displaced or destroyed during site preparation?

In regard to electricity:

Will new and existing transmission lines be fitted with bird-safe reflectors or line-marking devices to reduce collision and electrocution risk?

In regard to fuel:

Diesel is identified as a secondary fuel, with consumption listed at up to 75,000 litres per hour. Given that a standard tanker truck carries approximately 40,000 litres, this volume raises questions about logistics, emissions, and alignment with environmental goals.

Does diesel exhaust exit through the same stacks as natural gas combustion?

Will exhaust be treated with scrubbers?

Was air quality modelling conducted assuming diesel combustion, or only natural gas?

In regard to noise:

Noise modelling appears to be based on human tolerance levels. However, many species — including red fox, black bear, raccoon, deer, amphibians, birds, skunks, and porcupines — have more sensitive hearing across broader frequency ranges.

Black bears were reportedly detected via trail cameras, but for how long were cameras deployed, how many were used, and were neighbouring properties included? Wildlife does not adhere to property boundaries.

Will physical noise and vibration barriers (both above and below ground) be constructed

to limit sound propagation through air and soil? In a quiet rural environment like Marshdale, low-frequency hums can travel long distances at night.

Was sound monitoring conducted at a comparable fast-acting natural gas facility in a similarly rural setting? Urban facilities such as Dartmouth are not representative. A comparable rural reference site would provide a more accurate model.

In regard to construction, post-construction, and design:

Who will monitor workers for environmental compliance, and how frequently?

Lighting should be shielded and directed downward during and after construction.

Lighting can attract owls hunting rodents; poison use should be prohibited.

Roof design should prevent Killdeer nesting and uncontrolled snow shedding.

If green roofing is used, regular ecological monitoring will be required.

Temporary and permanent wildlife fencing should be installed.

Baseline and ongoing samples (water, soil, air) should be collected, documented, and retained.

Bird-safe glass or commercial deterrents (e.g., Feather Friendly) should be installed and maintained.

In regard to jobs:

Will Nova Scotia Power employees affected by coal plant closures be offered retraining or transition opportunities? Will former Northern Pulp workers have access to training or priority hiring if qualified?

What are the long-term health outcomes for workers exposed to emissions over many years? Have comparable facilities been consulted regarding worker health impacts?

In regard to trees:

Will trees removed during construction be replaced locally, watered, mulched, and maintained during early growth stages?

Will additional tree planting occur beyond one-for-one replacement to help offset emissions?

Can treated water be used to support these plantings?

In regard to consultants:

Hatch:

Why were they selected, and do they have experience conducting sound analysis for fast-acting gas plants in rural environments?

Strum:

Why did their assessment not extend beyond the project boundary, given that water, air, sound, and wildlife impacts extend well beyond property lines? If scope limitations were imposed, that raises concern about the adequacy of the assessment.

In regard to ethics:

IESO is publicly funded. How can the public be assured that environmental protection and community well-being are weighted alongside cost efficiency? Rural residents did not ask for industrial facilities near their homes, and long-term impacts to landscape character and peace deserve meaningful consideration.

In regard to property values:

For landowners who chose Marshdale for its quiet, views, and rural character — including those planning retirement homes or land sales — the presence of industrial stacks, emissions, and long-term truck traffic may negatively affect property values. Greater effort should be made to explore alternatives that minimize community disruption.

In regard to the Community Liaison Committee:

I joined the CLC out of concern that environmental considerations were being underrepresented. Given the number of unresolved issues, this concern remains valid.

Will CLC members be permitted to visit the site throughout construction and operation to verify compliance?

I will propose that qualified local naturalists and birders be granted monitored access to assist with independent observation.

In regard to ongoing monitoring:

I propose continuous, long-term monitoring using:

Acoustic bird recorders

Wildlife cameras

Air and water quality sensors

Ground vibration monitoring

Low- and high-frequency sound analysis

Monitoring should occur both on-site and in surrounding areas for the full life of the project.

In regard to wildlife deterrence:

Natural scent-based deterrents could be used to discourage wildlife from approaching fencing, ponds, and other hazards.

In regard to squirrels and birds:

Tree removal will inevitably displace squirrels and birds. Installing nesting boxes away from high-noise zones would help mitigate habitat loss.

In regard to emergencies:

With New Glasgow being the nearest paid fire department, do local and volunteer departments have the staffing, equipment, and training to respond to a major fire, explosion, or large-scale fuel spill? What contingency plans exist if volunteer capacity declines over time?

In regard to road traffic:

Heavy truck traffic will increase noise, safety risks, and road degradation. Will road maintenance be prioritized for the life of the project?

Additional measures could include:

Increased RCMP enforcement during construction

Penalties for repeat speeding violations by project vehicles

Rotating electronic speed display signs to improve compliance

Conclusion:

Both the Marshdale and Salt Springs projects raise serious concerns for me. While Marshdale appears more suitable than Salt Springs due to proximity to homes, natural gas — though cleaner than coal — still carries local environmental and community costs.

Perfect locations do not exist. However, projects of this scale must be assessed and monitored rigorously, transparently, and beyond property boundaries. Passive bird monitoring, expanded environmental assessments, and long-term oversight are essential if these projects are to proceed responsibly.

Respectfully,

Community Liaison Committee Member & Proud Nature Lover

Name:

Email:

City/Town

Postal Code

Attachment(s):

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Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls, xlsx

Maximum number of files allowed: 10

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Fast Acting Natural Gas Power Generation Facility – Salt Springs & Marshdale

Date Sun 2026-02-08 10:08 PM

To Minister, Env <Minister.Environment@novascotia.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>

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

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From:

South Lake Ainslie, N.S.

February 8, 2026

To:
Hon. Timothy Halman
Minister Department of Environment
1894 Barrington Street, Suite 1800
P.O. Box 442, Halifax, NS, B3J 2P8
Minister.Environment@novascotia.ca

Hon. Julie Dabrusin

Minister Environment

House of Commons

Ottawa, Ontario K1A 0A6

ministre-minister@ec.gc.ca

Re:

Re: Fast Acting natural Gas Power Generation Facility – Marshdale

I am writing this letter to express my concern with pushing ahead with these natural power gas power generation facility.

The cost of these installations plus long-term maintenance need to be more closely scrutinized. I do not think we need these plants at this time. There needs to be more research done to determine if there are better alternatives for power generation.

Why is our province pursuing the building of gas plants when they will be contributing to greenhouse gas and possible health concerns in the specific areas in which they are operating. They will be major users of fossil fuels. I believe we need to get off fossil fuel!!

Look at other alternatives for backup: Existing Coal Fired Power, Wind, buying from other suppliers (Hydro Quebec).

Build batteries at a fraction of the price of these plants as a backup system. It is a know fact that there is only a requirement for significant backup for only 5-7 days a year. Look at alternatives rather than building such an expensive system that the public will end up paying for while the oil and gas industry are the ones that stand to gain the most – not the private citizens

These EA's are biased and incomplete. Stop this development.

[Draft] Re: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County
CRM:0842166

From

To Minister, Env <Minister.Environment@novascotia.ca>

----- Original Message -----

Received: Tue Jan 27 2026 16:18:19 GMT-0400 (Atlantic Standard Time)

To: Premier's Office <premier@novascotia.ca>; Marco MacLeod MLA <info@marcomacleod.com>; ECO/OP - Premier <premier@novascotia.ca>;

Subject: Fw: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

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FYI

Forwarding to Minister, as requested by sender.

Also copying Minister assistant.

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Sent: Tuesday, January 27, 2026 4:03 PM

Subject: Re: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

Thank you for getting back to me. I appreciate you taking the time to respond.

My primary concern is that both the construction and operational phases of this project will have a significant detrimental impact on Nova Scotia's Atlantic salmon population.

For context, all rivers in Pictou County, with the exception of the Middle River, support Atlantic salmon. This is highly unusual within Nova Scotia, where only a few dozen rivers still maintain salmon populations. The West and East Rivers are the two most productive systems in the county, accounting for the majority of salmon in the region. While there are proposals to locate power generation facilities on both rivers — and impacts are likely in each — it is my professional opinion as a Marine Ecologist that constructing a facility at the proposed West River site would result in severe and potentially irreversible harm to the salmon population.

The proposed Salt Springs facility would be located along Eight Mile Brook and Six Mile Brook, tributaries of the West River situated north of Salt Springs Provincial Park. These tributaries represent two of the most ecologically important salmon habitats in Pictou County and arguably within the province. They are among the primary spawning areas used by Atlantic salmon each spring, making their protection essential if conservation and recovery of the species is to be taken seriously.

The most significant risk associated with the proposed facilities is water use. According to documentation submitted by the IESO, the plants would withdraw groundwater from local aquifers for cooling purposes. After use, this water would be treated and stored in tailings ponds before being discharged back into the river system. This poses a major threat to salmon, brook trout, and American eel.

Spawning success in Eight Mile and Six Mile Brook is driven largely by their function as cold-water refugia — the largest and most consistent cold-water inputs in Pictou County. During summer months, water temperatures in the main stem of the West River regularly exceed 26°C, while temperatures in these tributaries typically remain around 16°C. Atlantic salmon and brook trout begin to experience temperature-related stress and mortality when water temperatures exceed approximately 22°C for prolonged periods, conditions that occur annually in this system. As a result, thousands of juvenile salmon and trout migrate into these tributaries each summer to survive periods of elevated temperature.

Groundwater withdrawal from nearby aquifers would reduce the natural cold-water inputs that sustain these refugia. Compounding this issue, treated effluent discharged from tailings ponds would be reintroduced at temperatures well above natural groundwater levels, as tailings ponds are incapable of cooling water below ambient surface temperatures. This combination represents a direct threat to the thermal stability of these critical habitats.

I would also note that the site was selected due to its proximity to the Maritimes Pipeline, high-voltage transmission lines, and what has been described as “low ecological significance.” However, the IESO and Strum report identifies the presence of Atlantic salmon (Endangered under COSEWIC), brook trout, American eel (Special Concern under COSEWIC), black bear, red fox, white-tailed deer, and Black Ash (Threatened under the Nova Scotia Endangered Species Act). If this assemblage constitutes “low ecological significance,” it raises serious questions about how ecological value is being defined.

With respect to infrastructure proximity, the Maritimes Pipeline and high-voltage transmission lines intersect at numerous locations across northeastern Nova Scotia, including along the Middle River, which does not support Atlantic salmon or American eel. In my view, selecting one of the most ecologically sensitive watersheds in the region when less impactful alternatives exist nearby represents a significant disservice to both the environment and the local community. The process appears rushed and insufficiently thought out.

I have raised these concerns repeatedly with Aaron Long, Project Manager at IESO. Despite this, he maintains that the project would not require a federal impact assessment and would not impact fish habitat — conclusions that are not supported by the ecological realities of this system.

For these reasons, I felt it necessary to bring this matter directly to your attention. I have submitted formal statements to both the Impact Assessment Agency of Canada and Nova Scotia Impact Assessment; however,

given the extremely short submission timelines, limited consultation, and lack of transparency from the IESO, I believe it is important that these concerns be clearly communicated at the ministerial level.

I respectfully ask that you relay these concerns to the Minister of Energy. If there is any additional information I can provide, or if you have any questions, please do not hesitate to reach out. I recognize this is a lengthy email, and I appreciate your time and consideration.

Sincerely,

On Fri, Jan 23, 2026 at 12:03 PM

How are you?

Sorry for the delayed response.

I appreciate the email, I learned a few things about the salmon population. I've fished over the years, but never salmon. Glad to hear we have a healthy population in the West River.

What is your main concern about the power generation facility re: salmon population health? Is it a catastrophic event may occur and harm the river? Or do you think regular operations would be detrimental to the salmon stock? I'm interested in the answer.

Here are the channels to connect with to register your concerns:

The IESO has submitted their Environmental Assessments for both sites to the Department of Environment and Climate Change. Please find details here: <https://novascotia.ca/nse/ea/fangpgf-salt-springs/> and <https://novascotia.ca/nse/ea/fangpgf-marshdale/>

I suggest engaging directly by submitting your written comments to

Environmental Assessment Branch Nova Scotia Environment & Climate Change

P.O. Box 442

Halifax,

NS B3J 2P8

Or by email at EA@novascotia.ca.

You can also submit your comments to the Impact Assessment Agency of Canada at www.iaac-aeic.gc.ca.

I encourage you to reach out through these channels, so those making decisions here your input.

Take care.

Sent: January 16, 2026 2:58 PM

Subject: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

Hi There,

I am a Stellarton resident and professional Marine Ecologist. I am writing to both of you regarding my concerns over the IESO proposal to construct two "fast-acting natural gas power generation facilities" in Pictou County. I'm sure you both are aware of the proposals but I am not sure whether you are aware of the potential impact these systems will have on critical Atlantic salmon habitat. A species that is not only extremely important to the people of Pictou County but also federally protected. While currently listed federally as "Threatened" as of Dec 5th 2025 COSEWIC has recommended the Southern Gulf of St. Lawrence sub-species to be listed as Endangered in Northern Nova Scotia as it already has been in the Bay of Fundy.

As proposed, one facility would be constructed in Marshdale, near the upper East River, with a second facility proposed for Salt Springs along the West River.

While both proposed sites raise concerns regarding potential ecosystem impacts, the Salt Springs proposal is of particular concern to myself and fellow conservationists. The proposed location is situated at the confluence of Eight Mile and Six Mile brooks, just a few hundred meters from Salt Springs Provincial Park and the mainstem of the West River. Both tributaries provide critical Atlantic salmon habitat a species that is federally protected in Canada. Six and Eight Mile brooks as well as the West River system as a whole are home to one of the few remaining healthy salmon population in Nova Scotia. Eight Mile Brook specifically is one of the few remaining cold-water tributaries in the West River system an attribute that has been especially important in sustaining fish stocks during recent summers and is fundamental to the success of the rivers' salmon population moving forward. There is a strong argument to be had that Eight Mile brook is the single most important tributary and stretch of Atlantic salmon habitat in the West River and one of the most important stretches in the province.

In addition to its ecological significance, the stretch of river from Salt Springs Provincial Park to the bridge on Eight Mile Brook is arguably the most heavily used section of the West River by fly anglers and Indigenous harvesters. Every fall people from around our province and beyond come to our County to peruse salmon as people here have done for millennia. This proposal risks ending this longstanding tradition in one of the very few places we have left.

I recognize the importance of power generation and that this is an opportunity for some economic growth in our community but I do not understand why this has to come at the expense of our wildlife, Provincial parks and culture. According to the assessment conducted by STRUM Consulting this area was picked due to its "low ecological importance" and proximity to the Maritimes Pipeline, that is an absolutely ridiculous statement there are only ten scheduled salmon rivers in this province and this is one of them, how can that be of low ecological importance? As an ecologist I can inform you that it is not. All the while a few kilometers to the East is the Middle River which does not have salmon anymore (thanks to it being damned at its mouth while a precious PC government was in power.) The Middle River is also intersected by the Maritimes Pipeline. Could this not be an alternative that allows for the power generation systems to be constructed without risking the existence of an endangered species? These seems like an easy win for the Province.

Please hear my concerns regarding this issue as I am far from the only person who feels this way. I am more than happy to speak further about this or provide recent study data to highlight the rivers' importance. I see a real opportunity here for the province to do the right thing ecologically speaking without having to compromise any economic output and still reach our energy generation goals.

Thank you for your time,

Re: Do Not Approve Nova Scotia Natural Gas Plants' EAs

Date Sun 2026-02-08 9:31 PM

To Minister, Env <Minister.Environment@novascotia.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>

Cc claudiachendermla@gmail.com <claudiachendermla@gmail.com>; info@iainrankin.ca <info@iainrankin.ca>; gpns@greenpartyns.ca <gpns@greenpartyns.ca>

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

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

Submission for EAs for natural gas plants for Marshdale and Saltspring Nova Scotia

NS Minister of Environment: Timothy Halman:

Federal Minister of Environment: Julie Dabrusin:

Dear Ministers of Environment:

I write to ask that you do not approve the two EAs for Nova Scotia's proposed gas plants.

Over the past 25 years my work as a volunteer, employee and business developer has been dedicated to broadening public understanding and informing public policy to reduce reliance on fossil fuels and thereby associated greenhouse gas emissions / air emissions to reduce the impact of climate change. This has included being a board member (EAC, NSEN, Renewable Energy Industry Association of NS, Clean Energy Now, Nova Scotia Environmental Network, Friends of Halifax Common).

Here are SOME of many reasons that Nova Scotia's newly formed Independent Energy System Operator's (IESO) effort to build new gas plants in Nova Scotia must be rejected:

- These gas plants unnecessarily lock the province & citizens into the fossil fuel cycle for at least 40 years. There is no role for new gas plants in a climate crisis-we are already consistently failing to meet our goals to reduce emissions.
- Nova Scotians strongly oppose fracking and supported a moratorium that the Premier undemocratically removed. These plants will rely on either imported fracked gas or the development of an NS fracking industry which no one wants. In any case we know nothing about the future source, availability, security or price of the fuel.
- Gas extraction is immensely damaging to the environment, requires and pollutes huge amounts of water - NS is a province filled with watercourses, lakes and one where many rural dwellers rely on individual wells or small water courses. Water security is a problem as we experienced in 2025

with a record drought and in both 2024 and 2025 with a record loss of homes and forests from out of control wild fires.

- Burning Gas is harmful to public health and environment because of both climate / ghg gases and air pollution.
- These plants will industrialize otherwise very rural settings and pollute the environs with air, light, noise and traffic pollution.
- Many better, cheaper options to continue an energy transition exist that need to be advanced first. These included but are not limited to the following:
 1. Retain an existing coal fired generating plant to act as a back-up. It's paid for, can fulfill this role and the fuel is more readily transported and stored.
 2. Expand the existing battery backup capacity-there is federal money available for this.
 3. Negotiate a deal with Hydro Quebec for whatever amount of firm power is available this year, and negotiate to add to this as future power becomes available. Importing electricity from Quebec was meant to be an outcome of the New Brunswick - Nova Scotia grid interconnect update. Why hasn't there already been an agreement negotiated?
 4. Expand on-shore wind capacity with a publicly owned business-this could use public lands such as the Cape Breton highlands, to operate publicly owned wind farms instead of subsidizing privately owned utilities.
 5. Expand solar farms with publicly owned businesses. Better to operate publicly owned solar than subsidize privately owned utilities.
- Stop anticipating ever expanding electricity needs / demands and work to reduce these more broadly within our society. For example:
 1. Change building codes to: a. ensure higher energy efficiency standards; to regulate the use of low embodied carbon materials / low global warming potential (GWP) for use in construction; b. require solar installation for all new buildings; c. protect right to light for solar installations. Provide subsidies for energy efficiency and solar retrofits for existing buildings. Regulate demolitions to reduce waste of buildings and their materials and associated embodied carbon. Improve public education on climate change to improve awareness and support for reduction of energy consumption.
 2. Change transportation to ensure better more efficient means that does not rely on fossil fuels- commuter rail, rural bus service, wide adoption of EVs (these can potentially be part of a battery back up strategy as is being tested in some jurisdictions).

We are long past the time when we can ignore the urgency of pursuing an energy transition away from fossil fuels. Why would our provincial or our federal governments and the NS Minister of Energy and the IESO lock Nova Scotians into a huge undisclosed monetary debt to take us in the wrong direction without even undertaking a full analysis of the need and the available better, cheaper options?

Twenty years ago NSPI executives and government bureaucrats within the Nova Scotia Department of Energy would speak of reducing reliance on fossil fuels by picking the low-hanging fruit such as energy efficient / LED lightbulbs. Could it be that many of the same personalities are still operating within the government and universities such that there is no awareness of how far advanced many other countries are in their efforts to shift their reliance on fossil fuels? Or that renewables are better for the environment and for the economy?

We cannot anticipate what the energy future will be, but we are obliged to work to ensure that fossil fuels play an ever diminishing role in it. That includes not constructing expensive new gas plants.

Thank you,

Vice-president, Black River Wind Ltd.

