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For the Gaspé citizen's group *Non- Merci, Pozzolan Dalhousie*  
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**New Carlisle, February 11, 2025**

Mr. Steven Guilbeault,  
Minister of Environment and Climate Change  
House of Commons  
Ottawa, Ontario K1A 0A6  
Canada  
ministre-minister@ec.gc.ca

RE: Application for Environmental Impact Assessment  
Open-pit Pozzolan Mine Project, Dalhousie, New Brunswick

Dear Minister;

We are contacting you to request your intervention regarding the open pit pozzolan mine project in the municipality of Heron Bay (Dalhousie sector), New Brunswick, as proposed by EcoRock Dalhousie Inc. (EcoRock). Specifically, we are asking you to intervene by exercising your discretion under subsection 9(1) of the *Impact Assessment Act* (Act) to subject this project to a federal impact assessment.

As we read the Act, and based on the facts set out below, the operation of this mine is likely to result in adverse effects and/or adverse direct or incidental effects within federal jurisdiction. Indeed, the operation of this mine will certainly lead to significant changes in the habitat of salmon and other fish, various aquatic species including endangered species, as well as migratory birds, in the estuary of the Restigouche River and Chaleur Bay.

In addition, given the geographical location of the mine, negative health, economic and social effects, as well as a potential infringement of Indigenous rights, are anticipated. It is therefore essential that an impact assessment not be limited to the environmental dimension alone, but that it also takes into account, the social and economic aspects of the project as a whole, as provided for in the Act.

Furthermore, at an information session held in Carleton-sur-Mer, QC on October 29, 2024, EcoRock acknowledged "that part of the project, the dredging of the [Dalhousie] harbour, would require a federal impact assessment anyway."<sup>iii</sup> In our view, this assessment should include all mining activities and not be limited exclusively to the dredging of the port.

In the following sections of this letter, you will find the key facts and arguments necessary to justify a favourable decision to implement a full federal impact assessment for this project.

Principal Applicant:

Jean-Marc Beaulieu, co-spokesperson for the group  
Non-Merci, Pozzolan Dalhousie

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Contact Information for the subject of this application:

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**A. Location of the EcoRock Open-pit Pozzolan Mine and its Physical Activities**

a. Location

EcoRock intends to mine pozzolan from an existing open-pit gravel quarry, the Stewart Quarry, owned by L.C.L. Excavation (2006) Inc. (L.C.L.) and operating through a grandfather clause (*a legal Non-conforming Use*) on lands zoned for housing and conservation<sup>ii</sup>. This quarry is located in the Dalhousie sector, in the municipality of Heron Bay, which runs along the estuary of the Restigouche River and is located at the western end of the Chaleur Bay, in New Brunswick.

The Stewart Quarry is 87 ha in size<sup>iii</sup>, of which only 11 ha have been exploited to date<sup>iv</sup>. EcoRock says it wants to increase the area exploited to 80 ha,<sup>v</sup> an increase of over 50%. A recent amendment to the municipality's zoning by-law<sup>vi</sup> could, in effect, allow mining to operate on the three lots already in operation and two additional adjacent lots, bringing the potential usable area to 104.75 ha<sup>vii</sup>.

The territorial boundaries of the pozzolan mine are approximately 200 m from the closest of two high schools, in the same area (École Aux Quatre Vents),<sup>viii</sup> 500 m from private residences, and 250 m from the shores of Chaleur Bay and the Restigouche Estuary. The distance from the mine to the opposite shore in Quebec is 6.44 km from Escuminac; 4.85 km from Nouvelle and 6.3 km from Miguasha National Park, a UNESCO World Heritage Site<sup>ix</sup>.

In addition to the existing territory, EcoRock appears to be interested in acquiring, or has already acquired, certain infrastructure and operating rights and privileges relating to the Canadian National Railway facilities and certain municipal and provincial lands, Olin Chemical Inc., as well as to the American Iron and Metal Company Inc. and the Port of Dalhousie<sup>x</sup>.

b. Physical activities

The company proposes to operate the mine in two phases. In phase 1 (quarrying), the stone (pozzolan) will be blasted, crushed and sold in the form of aggregates. In phase 2 (mine), part of the aggregates will be finely ground to produce pozzolan<sup>xi</sup>. Coarse crushing of the aggregates (would) take place from the mine, and then be transported by conveyor, truck or train to an industrial complex located at the Port of Dalhousie<sup>xii</sup> on the shores of Chaleur Bay. At this location, the final milling of the aggregates into fine dust would take place and the dust would be stored in silos. For both Phases 1 and 2, the product would be transported by ship from the Port. EcoRock has expressed the need to request permission to dredge the bottom of the waters of the Chaleur Bay in order to create a passage deep enough to accommodate the increased draught needs of the ships<sup>xiii</sup>. The negative effects of this dredging are explained in Section C of this letter.

On December 4, 2024, on its website, EcoRock announced that it intends to produce three million tons annually by 2027, including two million tons of pozzolan and one million tons of aggregate.<sup>xiv</sup> During its information sessions, EcoRock has also committed to capping annual production at three million tons, regardless of market demand<sup>xv</sup>. It should be noted that this reported quantity is only 500,000 tons below the threshold to trigger a federal impact assessment<sup>xvi</sup>. Therefore, allowing EcoRock to avoid the legal obligation of an impact assessment at the federal level of government, despite the increased environmental risks of a project of this enormity.

In this regard, we note that Cimbec Inc., the promoter of a similar project in Port-Daniel-Gascon, QC, the McInnis cement plant had committed to manufacturing 800,000 tons of cement per year. Despite this, the cement plant has, in fact, installed a production capacity of 2.2 million tons annually<sup>xvii</sup>, more than double the original project intentions. Given that Cimbec Inc. is one of the promoters of EcoRock, we fear that, like the cement

plant project, EcoRock's parameters, in terms of volume operated, could be reassessed upwards once the project has begun its operations. Furthermore, a document entitled *Cimbec Dalhousie Natural Pozzolan Project*, (April 2022), states:

**Phase I** is the North side of the quarry where there are 232 million tons of permitted reserves above sea level with potentially additional 100 million tons below. **Phase II** is the South side of the quarry with an additional 150 million tons of reserves<sup>xviii</sup>.

Unless the proponent increases annual production, the citizens of the region and the environment could be exposed to the negative effects of the mine for more than 100 years.

## **B. Pozzolan**

Pozzolan consists of natural stone originating from volcanic projections that date more than 400 million years ago. According to analyses conducted on behalf of EcoRock by Co-Alia, Dalhousie pozzolan is composed of an average of 54.6% silicon dioxide (SiO<sub>2</sub>), 16.7% alumina or aluminum oxide (Al<sub>2</sub>O<sub>3</sub>) and 7.2% iron (Fe<sub>2</sub>O<sub>3</sub>).<sup>xix</sup> The health risks of microparticles, ultra-fine particles, and especially silicon dioxide, are described in section C of this letter.

## **C. Adverse Effects of the Pozzolan Mine Project**

As mentioned in our introduction, we have reason to believe that the operation of EcoRock's open pit pozzolan mine will have significant and potentially irreversible negative effects, as described below.

### **a. Dredging**

EcoRock plans to export pozzolan aggregates and milled pozzolan by sea from the Port of Dalhousie, near the Restigouche Estuary and in the Chaleur Bay. To do so, the company intends to dredge the bottom of the bay, leading to the port, to create a passage for the transportation by ship.

In the *Cimbec Dalhousie Natural Pozzolan Project* report, (April 2022) it is written that the current draught of 9 m can accommodate a capacity of 30,000 KT of aggregates or pozzolan. The report notes the desirability of increasing this draught to 14 m in order to accommodate a capacity of 60,000 KT.<sup>xx</sup> A report prepared by Cimbec Inc. and Carboniq, entitled *Dalhousie Pozzolan Project, Preliminary Project Description* (July 2022), further states: "*Dredging of the East wharf could be necessary if vessels with a draft greater than 10 meters are used.*"<sup>xxi</sup>

### **b. Contaminated area**

- c. In addition, according to Michel Chouinard, strategic advisor to the *Conseil de l'Environnement de la Gaspésie*, this sector of Chaleur Bay is one of the most contaminated shorelines in North America, in terms of mercury, lead and arsenic sediments. This observation was already made in 2005 in a report entitled: *Cancer in New Brunswick Communities*, in these terms:

*Over the past 40 years, hundreds of federal and provincial government reports, studies and environmental assessments have documented contamination of air, water, soil, fish, wildlife and/or vegetation in Saint John, Belledune, Miramichi, Bathurst and Dalhousie<sup>xxii</sup>.*

This contamination is due to the industrial history of this region and a bygone era. Environment Canada reported in its *Bilan régional Gaspésie-Sud-Baie-Des-Chaleurs, Zone d'intervention prioritaire 20* (Le Bilan régional, 1997) that:

*Several major industrial establishments are located on the south shore of the Baie des Chaleurs: three pulp and paper mills (in Atholville, Dalhousie and Bathurst), three thermal power plants (two in Dalhousie and one in Belledune), a chlor-alkali plant in Dalhousie, etc. These industries have largely contributed to the contamination of the south shore of Chaleur Bay by toxic substances, including cadmium, lead and mercury<sup>xxiii</sup>.*

This contamination creates a serious problem with respect to the dredging of the seabed. The Regional Report states in this regard that:

*Maintenance dredging of harbours, fishing harbours and marinas is a source of contamination when it releases toxic substances that would otherwise be isolated from the aquatic environment in the deep layers of sediment<sup>xxiv</sup>.*

More precisely, the Marine Pollution Bulletin reported in 2015:

*... concentrations of total mercury (THg) were measured in coastal marine sediments near a former chlor-alkali plant in Chaleur Bay, New Brunswick. ...Whilst sediment THg contaminant concentrations are lower than those previously reported, most of the contaminant inventory remains intact below the sediment surface, with the potential risk for future contaminant disturbance or resuspension. [...] In order to properly understand potential management options, such as dredging or ecological risks associated with contaminated sediments in Chaleur Bay, more information related sediment characteristics are required<sup>xxv</sup>.*

Mr. Chouinard agrees and has also mentioned more recently that, EcoRock's dredging work will have the effect of recirculating the heavy metals buried in the sediments of the Chaleur Bay, both on the New Brunswick and Quebec sides, especially given the gyratory current of the Bay and the continuous passage of larger and more frequent transport ships.

It is interesting to note that EcoRock similarly raised this possible transboundary impact during an information session<sup>xxvi</sup> and, as quoted in the introduction, "that part of the project, the dredging of the [Dalhousie] harbour, would require a federal impact assessment anyway."<sup>xxvii</sup> We agree with this, especially since the Chaleur Bay and the Restigouche River estuary are critical areas for migratory fish such as, Atlantic salmon (*Salmo salar*), the American eel (*Anguilla rostrata*) and the sea trout (*Salmo trutta*), in the river's main branch and upstream tributaries<sup>xxviii</sup>.

***Impact on fish (including salmon) and other aquatic species:***

We are aware of the National Strategy and the Government of Canada's efforts to protect and preserve Atlantic salmon<sup>xxix</sup>. Atlantic salmon decline is a grave concern, given the significantly low returns in most salmon rivers, in eastern Quebec and New Brunswick.

Consequently, the Government of Quebec has restricted fishing conditions during the 2024 season<sup>xxx</sup> and announced additional restrictions for the 2025 season<sup>xxxi</sup>. Any additional disturbance, particularly within the migration corridor at the mouth of the Restigouche River, could lead to a further decrease in the salmon population in this river and that of the ten salmon rivers farther upstream, and could result in its complete disappearance in the area.

In addition, on the Quebec side, dredging could lead to contamination of the Miguasha Shellfish Bank, only 6 km from the Dalhousie Port. This mollusk bank remains one of the few remaining sites accessible to the public on the Quebec side of Chaleur Bay and plays an important role in the local heritage<sup>xxxii</sup>. This area is also home to a long tradition of ice fishing for rainbow smelt and lobster, primarily for the region's Indigenous communities.

Mining activities, described in Part A, including dredging, but also the continuous passage of carrier vessels and blasting 250 m from Chaleur Bay will likely have a negative impact on salmon, their habitat, and other aquatic species (cockles and lobster). An independent and comprehensive impact assessment by the Federal level seems essential, given the fragile circumstances of these waters.

***Impact on wetlands, waterways and species at risk***

At least two reports, the *Rezoning Report, Rock Quarry Expansion L.C.L. Excavation (2006) Inc. and Cimbec*, prepared by the Regional Restigouche Commission (Commission Report) and the *Field Studies Update Wetlands Agenda*, by Engineering Fundy<sup>xxxiii</sup>, identify wetlands and watercourses (at least one of which flows directly into the estuary) on the mine's intended territory.

The Commission's Report states:

*Since the whole quarry floor would be excavated within the pit, the existing wetlands, watercourses and other features would be completely removed and replaced by compensation measures that need to be discussed between the proponent and provincial authorities. The proponent mentions that the expected location to construct a compensatory wetland would be the lower Olin Chemical boundary<sup>xxxiv</sup>.*

EcoRock also states that "there are 4 ha of wetlands in the project area." The company claims that it wants to contact the New Brunswick Department of Environment to discuss compensation measures for the affected wetlands<sup>xxxv</sup>.

According to information gathered from NatureServe and iNaturalist, there are several species of birds and plants that are threatened and at risk in New Brunswick and are found in the Dalhousie area. These species include the monarch butterfly (*Danaus plexippus*), the Baltimore oriole (*Icterus galbula*), the bank swallow (*Riparia riparia*), the barn swallow (*Hirundo rustica*), the wood thrush (*Hylocichla mustelina*), the pellerin falcon (*Falco peregrinus*), bedstraw (*Galium obtusum*), the scoundrel or celery-leaved buttercup (*Ranunculus sceleratus*), the brown-crested arnica (*Arnica lonchopylla*), and viviparous knotweed (*Polygonum viviparum*).

### ***Impact on migratory birds***

As reported on the Nature NB website, the Restigouche River is a major migration and feeding site for several species of seabirds. In the spring of each year, thousands of birds flock to the estuary to migrate or to settle on adjacent shores<sup>xxxvi</sup>. In 2000, the estuary was declared an "Important Bird Area" (IBA), a status granted to sites of international importance for the protection of birds and biodiversity<sup>xxxvii</sup>. In Dalhousie, birds of all kinds can be found:

*..., birds of all kinds rise above the open water: double-crested cormorants, long-tailed ducks, common mergansers and many others. In the spring of each year, thousands of birds flock to the Restigouche River estuary to migrate or settle on the shores of this spectacular corner of New Brunswick<sup>xxxviii</sup>.*

### ***Impact on human health, the economy and the social fabric***

With respect to human health, Dalhousie pozzolan is composed of 54.6% silica, a toxic component in its crystallized form. Several reports indicate that inhaling crystallized silica can lead to serious health problems, including silicosis (an irreversible lung disease).<sup>xxxix</sup>

The town of Dalhousie is already one of the cities most affected by heavy industry and its citizens have been negatively impacted. According to *Cancer in New Brunswick Communities*:

*Human health risk assessments have been done in several communities over the past 10 years as part of proposed industrial expansion, development or remediation projects. They concluded that current levels of ... arsenic in Dalhousie ... posed cancer and non- cancer health risks to residents<sup>xl</sup>.*

Considering that in Dalhousie, the prevailing winds are from the Northwest, the activities of the EcoRock pozzolan mine (drilling, blasting, transporting and milling aggregates and pozzolan into fine powder, all release fugitive dust), therefore pose a clear and direct risk to the residents of Dalhousie and surrounding areas. Consider the well-being of school students and teaching staff of the *École des quatre-vents* located 200 m from the limits of the mine's territory, as well as the families living only 500 m away. Surrounding municipalities, including Indigenous communities, wildlife, birds and many hectares of untouched forests will be gravely impacted. The potential damage to local waters, rivers, Chaleur Bay and the Restigouche River estuary must be rigorously assessed.

When asked about the potential dangers of silica, EcoRock's answer was unfortunately laconic and half-reassuring. EcoRock said "no guarantee can be given, but the issue will be addressed in the environmental impact study".<sup>xli</sup> In another forum, EcoRock made a point of clarifying that it is crystallized silica that is toxic, while conceding, following an additional question, that it does not know whether finely ground Dalhousie pozzolan will contain silica in its *crystallized form*<sup>xlii</sup>.

The noise of the mine's physical activities, especially the crushing and trucking of aggregates and pozzolan equally represent a major negative impact on the community. Constant trucking and daily blasting cause incessant noise and strong vibrations, repeated in the short, average and long term, will destroy any possible quality of life for Heron Bay citizens for generations to come; according to EcoRock, for 60 to 100 years!

From an economic, cultural and social point of view, the Chaleur Bay region represents an important economic engine. According to the Conservation Council of New Brunswick:

*...About a hundred coastal communities depend on the resources and services offered by this ecosystem by participating in the "blue" economy. These include fishing, seafood processing, aquaculture, maritime transport, tourism, not to mention the conservation of the marine, coastal and terrestrial environments of the watershed. These sectors are vital to the region in terms of regional development and the maintenance of a strong cultural identity<sup>xliii</sup>.*

As part of the strategy specifically targeting Atlantic salmon populations, the Honourable Diane Lebouthillier recognized the importance of the fishing industry as key,

*... a popular recreational activity for residents and visitors, promoting tourism and appreciation of Eastern Canada's natural beauty. The species [in this case, salmon,*

*but we believe other species as well] is vital to the ecological, cultural and economic well-being of our coastal communities<sup>xliv</sup>.*

Private sport fishing camps are one of the industries that generates the greatest economic benefits for the region. Cockle digging has recently been the subject of ethnographic and documentary research by CIRADD, a college centre for technology transfer, affiliated with the Carleton-sur-Mer campus of the *Cégep de la Gaspésie et des Îles*. It was noted that "*in the spring, but also in the fall, hundreds of Gaspésians gather along the coast to fish for soft-shell clams (Mya arenaria), a mollusk better known as the "cockle".*

For several years, the people of the MRC d'Avignon have developed a socio-economic recreational tourism model based on nature (spas, cottage rentals, and camping, water sports and activities, including sport fishing, etc.). The town of Nouvelle has invested in an inn and is preparing to take possession of its wharf from Fisheries and Oceans, Canada (DFO), to eventually develop a marina. Businesses in Miguasha, among others, fear for their economic future<sup>xlv</sup>.

Tourists, attracted by the beauty of the Quebec shoreline of Chaleur Bay, its clean air, water and pristine tranquility, and especially the variety of outdoor activities offered, return year after year, providing jobs for the local populations. People settle in the region for the same reasons, vibrant natural beauty and healthy living, particularly in Escuminac, Miguasha and Nouvelle in recent years. The visual and light pollution will mar the present scenic offshore view from the Quebec shoreline. The environmental noise of the mining activity will be amplified by the bay's waters and these detrimental impacts will substantially diminish any potential tourism to the area, let alone, the quality of life for its present and future inhabitants.

In order to ensure adequate recognition of the concerns raised by the residents of the Gaspé coast of the Chaleur Bay, the National Assembly of Quebec unanimously adopted a motion, on November 29<sup>th</sup>, 2024. It "asks the government of New Brunswick to take into account the impacts on Quebec territory before authorizing the project."<sup>xlvi</sup> A project that has environmental effects in more than one province should always be subject to a federal impact assessment, so that the province in which the project is proposed is not approved without sufficient consideration of the effects in another province.

It should also be noted that the region is recognized nationally and internationally for its natural attractions. The upper part of the Restigouche River (a 55 km stretch on the New Brunswick side) has been designated as one of the 40 Canadian Heritage Rivers since 1998, because of its "outstanding" natural, historical and recreational values, a rare recognition of its special and unique character<sup>xlvii</sup>.

The Chaleur Bay is recognized as one of the most beautiful bays in the world<sup>xlviii</sup>. As such, the municipality of Carleton-sur-Mer, together with the municipality of Tadoussac, will be the co-hosts of the 2025 convention of the *Club des plus belles baie du monde*, welcoming delegations from all over the world. This Club, founded in 1998, showcases bays scattered around the world, in addition to promoting the protection of biodiversity and ecosystems<sup>xlix</sup>.

Finally, Miguasha National Park, located directly across from Dalhousie Harbour, is a rare fossil site, listed on the UNESCO World Heritage List since 1989. The Honorable Minister Guilbeault would certainly be aware, as the Miguasha Fossil Museum which falls under his care, as part of Parks Canada, a dossier which he must certainly oversee with great care. The UNESCO designation not only generates great national pride and economy but also entails important obligations:

*...By signing the Convention, each country commits not only to the proper conservation of the World Heritage sites on its territory, but also to the protection of its national heritage.*

It is inconceivable that this frontier region, known not only in Canada but also worldwide for its natural features and unique value, would be the cradle of a revival of such harmful mining activities. The operation of EcoRock's open pit pozzolan mine, without a thorough analysis of its potential negative effects, seems incompatible with the quality of such a renowned site.

#### **D. Aboriginal Unceded Territory**

One of the most important considerations is that the territory targeted by the EcoRock Pozzolan Mine Project is located on the ancestral unceded lands of the *Mi'gmaq* Nation, *Gespe'gewa'gik*. Three other communities are located near the project: *Ugpi'ganjig* (Eel River Bar), *Listuguj* and *Gesgapegiag*. The interests of these communities are also an important issue, in accordance with section 35 of the *Canadian Constitution* and international commitments.

Moreover, these communities are developing a healthy and prolific economy thanks to the abundance and management of certain resources that are likely to be compromised by the EcoRock Dalhousie project, such as the commercial lobster fishery, the access to salmon that each community enjoys, as well as the significant tourist attraction of a natural environment for wild fauna and flora. In addition to being a social driver, these initiatives, rooted in the relationship to the land and resources, maintain the link with *Mi'gmaq* traditions. This allows residents to maintain, integrate and modernize practices that are in harmony with the environment, but also to maintain a healthy lifestyle, more independently and closer to their cultural identity.

## **E. Social acceptance: The EcoRock Company and the lack of transparency**

Recognizing the importance of social acceptability during the implementation of significant projects such as this one, we bring to your attention the history of the project and some elements, certainly non-exhaustive, but nevertheless worrying.

The pozzolan mine project was first launched by Quebec companies Cimbec Inc. and Carboniq in 2019-2020. In order to move the project forward, these companies have taken several steps which, for the most part, are documented in the *May 2022 Rezoning Report of the Restigouche Regional Service Commission*<sup>li</sup> as well as a report prepared by these companies, entitled *Preliminary Description of the Dalhousie Pozzolan Project*<sup>lii</sup> (revised July 2022).

In July 2024, EcoRock Dalhousie Inc. was formed, with its financing made possible through efforts by Cimbec Inc. and Carboniq. This funding allowed these companies to hire Mr. Forlini, who became the general manager of EcoRock; while the officers of Cimbec Inc. and Carboniq, Mr. Rousseau and Mr. Carrier, joined the board of directors of this new company<sup>liii</sup>.

In September and October 2024, EcoRock held three information sessions, two in the municipality of Dalhousie and one in Carleton-sur-Mer<sup>liv</sup>. During these meetings, EcoRock said that the project was in its early stages, that nothing had yet been defined, that no feasibility or environmental impact study had yet begun<sup>lv</sup>.

However, based on documents obtained under the *New Brunswick Access to Information Act*, including the two reports mentioned above, we note that the project is much more advanced than insisted upon, repeatedly by Mr. Forlini of EcoRock at each public information session.

Thus, according to the *Preliminary Description of the Pozzolan Project*, the project would have started in 2018-2019. It discusses the infrastructure available and necessary for the project. For example, we learn that in November 2020, an agreement was signed between the Port of Dalhousie and Cimbec Inc. granting Cimbec Inc. the rights and privileges necessary to facilitate the export of pozzolan. Also, the document refers to the analyses, carried out in 2021, on aggregates from the existing quarry and for which the Cimbec company obtained the rights and operating guarantees, also in 2021<sup>lvi</sup>. The document also describes the various components of the project, including the exploitable territory, the acquisition of mine rights, the processing steps and transportation to the port.

As for the Commission's rezoning report, it shows that in 2021-2022, L.C.L. and Cimbec Inc. were working together on a rezoning application resulting in the expansion of the quarry's territorial boundaries. In July to August of 2022, the Heron Bay's municipal council

members were made aware of these two reports. Nothing was disclosed to the Heron Bay citizens until council initiated the zoning amendment procedures in the spring of 2024.

EcoRock's claims that nothing has been defined and that the project remains no more than a "concept" seems to underrepresent reality. In addition, there have been blatant contradictions at several levels. One example of this is, as *the Commission's Rezoning Report indicates*, EcoRock intends to operate 7 days a week, from 6 AM to 9 PM<sup>lvii</sup> and to increase production from the quarry to two million tons per year. In public information sessions, EcoRock stated that it did not want to operate in the evenings or on weekends<sup>lviii</sup>, while aiming for a higher productivity of three million tons per year. This paradox demonstrates that the quantity mined by EcoRock could be increased, if so desired, even if it triggers a federal impact assessment. We strongly believe that this potential scenario must be quelled immediately, and prior to any of the afore mentioned negative impacts are realized.

The lack of clarity, timely and open communication has been ongoing (a fact that EcoRock admits to in a July ,2024 correspondence<sup>lix</sup>). The apparent lack of sincerity regarding the impacts and questionable process of the project, have the effect of undermining the confidence of the communities most affected by the project. The reports of the information sessions reflect this lack of trust and the accumulated frustration of citizens. Clearly, social acceptability is far from obvious at all three information sessions, especially that presented in Carleton, QC. Job promises another flagrant example

For the reasons cited, we ask you, Honorable Minister Guilbeault to intervene under your authority and that of the IAA, to ensure a comprehensive Federal impact assessment process that will be efficient, transparent, and considerate of the surrounding communities, both native and non- native, in Quebec and New Brunswick. All inhabitants share this bay's rare, fragile beauty, and, only on the basis of a non-biased and informed decision, can the viability of the Pozzolan Mine Project be made.

We thank you for your attention to this crucial request and remain available for any further information or discussion needed.

While awaiting your reply, we ask you, Honorable Minister Guilbeault, to accept the expression of our distinguished greetings.

c.c. The Honourable Diane Lebouthillier, P.C., M.P., Minister of Fisheries, Oceans and the Canadian Coast Guard, M.P. for Gaspésie—Les-Îles-de-la-Madeleine (Québec)

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Mr. Benoit Charette, M.N.A, Minister of the Environment, the Fight Against Climate Change, Wildlife and Parks, Québec

[ministre@environnement.gouv.qc.ca](mailto:ministre@environnement.gouv.qc.ca)

Hon. Gilles LePage, Minister of Environment and Climate Change, Minister responsible for the Regional Development Corporation, Nouveau-Brunswick, M.P. Restigouche West

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Ms. Catherine Blouin, M.P., Parliamentary Assistant to the Minister of Health, Quebec, M.P. Bonaventure (Québec)

[Catherine.Blouin.BONA@assnat.qc.ca](mailto:Catherine.Blouin.BONA@assnat.qc.ca)

## Signatures

### Companies / NPOs / support groups

- EST Éco-cabines (Louise Landry, propriétaire)
- Mères au Front
- Cimes Aventure (Élodie Brideau, présidente directrice générale)
- V Plongee
- Parti Québécois de Bonaventure (Claude Lussier, président exécutif)
- Gaspésie Côtière (Andrew Murphy, co-propriétaire)
- Café Acadien Bonaventure
- Écoforesterie Gaspésienne enr. (Robert Eichenberger)
- Conseil central GÎM-CSN (Serge St-Pierre, Président)
- Club des naturalistes du Restigouche Naturalists Club
- Collectif le Récif
- collectif La Pigeonnière

### Individuals from Quebec and New Brunswick

- Élodie Samuel-Leduc (Citoyenne impliquée dans Mères au Front)
- Marie-Josée Racine (Géographe - impliqué dans Mères au Front)
- Claudie Thibaudeau (Citoyenne impliquée dans Mères au Front)
- Anne-Sophie Frémond (Citoyenne impliquée dans Mères au Front)
- Michelle Secours (Présidente de Frëtt Solutions, impliqué dans Mères au Front)
- Claire Moeder (Citoyenne impliquée dans Mères au Front)
- Émilie Smith-Lauzon (Citoyenne impliquée dans Mères au Front)
- Laurie-Anne Cloutier - (Citoyenne impliquée dans Mères au Front)
- Sarah Auger (biologiste)
- Joseph St-Denis (Boulangier)
- Mariève Boucher (Agente de développement - Citoyenne impliqué dans Mères au Front)
- Veronique Laplante
- Luc Potvin (Agriculteur et organisateur communautaire)
- Véronique Reich
- Aurélien Bisson (retraité)
- Martin Wallden (Citoyen engagé)
- Leonard Jordaan
- Stéphanie Minot
- Ian Provencher (agronome)
- Nicole Grenier
- Nicole Babin (ostéopathe)

- Joëlle Nadeau
- Monique Paré (retraîtée, grand-mère de 4 enfants)
- Ann Guilbeault
- Reine Degarie (Citoyenne concernée par la pollution dans mon environnement immédiat et planétaire.)
- Owen Fugère
- Doriane Landry (Comptable)
- EmilieJade Fredette
- Juliette bergeron
- Marc-Alexandre Martin (entrepreneur)
- Donna Murphy
- Pauline Cyr Bujold (Retraité)
- Normand Desjardins (retraité)
- Suzanne LeClair
- Marianne Morin (intervenante communautaire)
- Ève Dugas (membre du groupe Non merci, Pozzolan Dalhousie)
- Daniel Bernard
- David Doucet
- Mirka Roberge (conseillère beauté)
- Patricia Chartier
- Carolle Babin (Retraîtée)
- Joyce Stewart
- Richard Loubert (retraité)
- Annie Chénier (entrepreneure)
- Réal Leblanc
- Nicholas Caissy (Coordinateur de programmes- préparation à l'emploi)
- Roger Pitre
- Katia Guité
- Johanne charest
- Sylvie Bélanger
- Donna LaPointe
- Nicole Bergeron-Ruffo (Cotoiyenne de Baie des Hérons)
- Josiane Torresan (Ostéopathe)
- Camille Chiasson
- Natacha Chiasson
- Isabelle Brodeur (Conseillère recherche et innovation, fonctionnaire (MSSS))
- Robert Eichenberger (Écoforestier)
- Francis Toupin
- Lancelot Tremblay (Capitaine de bateau)
- Dannie Cormier Physiothérapeute
- Camille Bordeleau
- Lori Baker (Homeowner in Dalhousie, NB)
- Geneviève Hamelin (Travailleuse autonome)
- Josée Kaltenback (citoyenne de New Richmond)
- Marc-André Bernard (biologiste)
- Sabrina Paquet
- François Bélanger
- Léo Ouellet
- Joanne Morency (écrivaine)
- Geneviève St-Hilaire
- Denis Garnier (vice-président chez GE Vernova)
- France Bienvenue (RSGE)

- Gino Cloutier (Opérateur, CSN)
- Anne-Sophie Lépine Landry
- Marie Poirier
- Diane Cyr (éducatrice)
- Lisa Fraxe
- Linda Rail (retraîtée)
- Mic Dufour (pigiste)
- Marie Hudon
- Jacques Ouellet
- Andrée-Anne Mercier
- François Bujold
- Hardy Caroline
- Mariève Boucher
- Alexandra Cyr Poirier (orthopédagogue)
- Alex Landry (chef monteur de lignes)
- Guy Poirier (retraité)
- Laurie L'Abbé
- Marie-Mylène
- Laura-Ève Boudreau
- Andréanne Cavanagh (orthopédagogue)
- Blanche Michaud (Citoyenne et contribuable de Baie des Hérons, NB)
- Edith Cyr
- Dorina Allard
- Benoit Toupin (tuyauteur)
- Marylène Desjardins
- Malcom Tannier
- Réjean Luce (retraité)
- Jade St-Aubin
- Jean-Claude Plourde
- Elaine Poirier
- Sylvia Babin (retraîtée)
- Charlotte Ribotta
- Nicole Bouchard (Coordonnatrice, Direction adjointe scientifique au CRCHUM)
- Gaston Allard (retraité)
- Pierre Cyr
- Sara Kim Bourdages (Citoyenne de New Richmond)
- Joanne Lantaigne
- Charles H. Stewart
- Joyce Stewart
- Nicole Robichaud
- Chantal Robichaud
- Mathieu Leclair
- Céline Martin
- Nicholas Caissy
- Carissa Dempsey
- Claudine Valleranel
- Claude Lussier
- Théodan Gauthier (Citoyen de Saint-Alexis)
- Théo Rottuel
- Ruby Arrowfield
- Marine Plissanier

- Monique Chiasson McNare
- Miriam Lebeau
- Caroline Dugas
- Suzanne Lauzon (Citoyenne de la Baie-des-Chaleurs)

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<sup>i</sup> TRANSFERT ENVIRONNEMENT ET SOCIÉTÉ, *Minutes of the public meeting on the pozzolan project of October 29, 2024*, in Carleton-sur-Mer, November 27, 2024, pp. 7 and 19.

<sup>ii</sup> MCIP AND RESTIGOUCHE REGIONAL SERVICE COMMISSION, *Rezoning Report, Rock Quarry Expansion L.C.L Excavation (2006) Inc. and Cimbec*, Town of Dalhousie, NB, May 2022, p. 3.

<sup>iii</sup> MCIP AND RESTIGOUCHE REGIONAL SERVICE COMMISSION, *Rezoning Report, Rock Quarry Expansion L.C.L Excavation (2006) Inc. and Cimbec*, Town of Dalhousie, NB, May 2022, p. 4.

<sup>iv</sup> TRANSFERT ENVIRONNEMENT ET SOCIÉTÉ, *Report of the Public Meetings on the Pozzolan Project on September 20, 2024*, in Baie-des-Hérons, October 8, 2024, p. 3.

<sup>v</sup> TRANSFERT ENVIRONNEMENT ET SOCIÉTÉ, *Report of the Public Meetings on the Pozzolan Project on September 20, 2024*, in Baie-des-Hérons, October 8, 2024, p. 3.

<sup>vi</sup> **By-law No. 806-24-01: A by-law to amend By-law No. 806-11, Town of Dalhousie Zoning By-law; By-Law No. 805-24-01: A By-Law to Amend By-Law No. 805-08 Municipal Plan By-Law**

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<sup>ix</sup> The distances were taken from Google maps.

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<sup>xiii</sup> TRANSFERT ENVIRONNEMENT ET SOCIÉTÉ, *Minutes of the public meeting on the pozzolan project of October 29, 2024*, in Carleton-sur-Mer, November 27, 2024, p.14; CIMBEC INC. AND CARBONIQ INC., *Dalhousie Pozzolan Project, Preliminary project description*, July 2022, p. 18.

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