

FORMAL ENVIRONMENTAL COMPLAINT

Irving, Forestry, Glyphosate, Clear-Cutting and Air Quality in New Brunswick

To: Minister of Environment and Climate Change
Government of New Brunswick

From: Marie-Soleil Seshat Landry
Community: Moncton, New Brunswick
Date: August 20, 2026

Subject: Request for a Comprehensive Investigation into Cumulative Environmental Impacts in New Brunswick

Dear Minister,

I am writing as a concerned New Brunswick resident to request a comprehensive review of the province's approach to environmental protection, particularly concerning industrial activity, forestry practices, glyphosate use, clear-cutting and air quality.

My concern is not limited to one facility, one company or one environmental issue. It concerns the **cumulative impact** of industrial and forestry activities on New Brunswick's air, forests, waterways, wildlife and communities.

New Brunswickers deserve to know that the environment they depend upon is being protected through transparent, independent and effective regulation.

1. AIR QUALITY AND INDUSTRIAL EMISSIONS

New Brunswick contains major industrial facilities, including facilities associated with the Irving group, operating in and around populated communities.

I am requesting a transparent assessment of:

- Air-quality monitoring around major industrial facilities;
- Reported emissions and emission trends over time;
- Odour and air-quality complaints made by residents;
- Regulatory warnings, investigations and enforcement actions;
- The adequacy and independence of existing monitoring;

- Whether monitoring locations accurately represent conditions experienced by nearby residents;
- The cumulative effect of multiple industrial sources.

Residents should not have to wonder whether their concerns about air quality are being adequately investigated.

Where industrial facilities operate close to communities, the public deserves accessible information about emissions, monitoring results and regulatory compliance.

2. FORESTRY AND CLEAR-CUTTING

New Brunswick's forests are one of the province's most important natural resources.

However, extensive harvesting has transformed significant portions of the provincial landscape.

I am requesting greater transparency concerning:

- The total area harvested each year;
- The amount harvested through clear-cutting or intensive harvesting;
- The condition and age of forests before harvesting;
- Regeneration success following harvesting;
- Impacts on wildlife habitat and biodiversity;
- Effects on watersheds, rivers, streams and wetlands;
- Soil disturbance and erosion;
- Impacts on carbon storage;
- The cumulative effects of harvesting across watersheds.

Replanting trees should not automatically be considered equivalent to replacing a mature forest ecosystem.

The government should evaluate whether forest management is maintaining biodiversity, mature forest habitat, soil health, water quality and long-term ecological function.

3. GLYPHOSATE AND FORESTRY HERBICIDE USE

I am also requesting full transparency regarding glyphosate use in New Brunswick forestry.

The public should be able to determine:

- Where glyphosate has been applied;

- How much has been applied;
- Which companies or contractors conducted applications;
- The purpose of each application;
- What environmental assessments were conducted;
- What monitoring occurs before and after applications;
- What buffers apply around homes, waterways and sensitive areas;
- What independent testing has been performed;
- What scientific evidence the province relies upon when authorizing or permitting such practices.

This request does not assume that every application of glyphosate is necessarily harmful.

It is a request for **transparency, accountability and independent verification**.

People have a legitimate interest in knowing when herbicides are being applied in the forests surrounding their communities and what safeguards are being used.

4. IRVING AND CUMULATIVE ENVIRONMENTAL IMPACTS

Irving companies are a major economic presence in New Brunswick.

Economic importance, however, should not mean reduced environmental scrutiny.

Where companies associated with the Irving group operate across petroleum, pulp and paper, forestry and other resource-related sectors, the province should provide clear information about the cumulative environmental impacts of those activities.

I am requesting information concerning:

1. Irving-related forestry operations and their geographic extent;
2. Forestry harvesting volumes and practices;
3. Herbicide use associated with forestry operations;
4. Air emissions from Irving-related industrial facilities;
5. Environmental monitoring;
6. Public complaints;
7. Government investigations;
8. Enforcement actions;
9. Environmental approvals and conditions;
10. Whether cumulative impacts from multiple operations are assessed together.

5. INDEPENDENT ENVIRONMENTAL MONITORING

Public confidence requires more than assurances that regulations are being followed.

I am requesting stronger independent environmental monitoring in communities affected by major industrial and forestry operations.

Environmental monitoring data should be:

- Publicly accessible;
- Easy for ordinary residents to understand;
- Published promptly;
- Available historically so trends can be identified;
- Accompanied by information about testing methods and detection limits;
- Subject to meaningful independent scientific review.

Where appropriate, the government should also consider community-based monitoring and independent third-party verification.

6. CUMULATIVE ENVIRONMENTAL EFFECTS

Residents do not experience environmental impacts one regulatory approval at a time.

They experience the combined effects of:

Industrial emissions + transportation + forestry harvesting + habitat loss + herbicide application + dust + smoke + wildfire smoke + changing climate + impacts on water and ecosystems.

Environmental regulation should therefore consider cumulative effects rather than assessing each activity entirely in isolation.

A project may appear acceptable when considered individually while the combined environmental burden on a community or ecosystem may nevertheless be significant.

7. REQUESTS FOR GOVERNMENT ACTION

I respectfully request that the Government of New Brunswick:

- Conduct a comprehensive review of air quality in communities affected by major industrial facilities;
- Publish historical industrial emissions and air-quality data in an accessible format;

- Publish information concerning environmental complaints and government responses;
- Review the independence and adequacy of industrial air-quality monitoring;
- Publish comprehensive information concerning forest harvesting throughout the province;
- Provide transparent records concerning forestry glyphosate applications;
- Assess the cumulative ecological effects of intensive forest harvesting;
- Review the environmental consequences of clear-cutting at the watershed level;
- Strengthen independent environmental oversight;
- Ensure meaningful public participation in significant environmental decisions;
- Require transparent environmental monitoring associated with major industrial and forestry operations;
- Review whether existing regulations adequately protect residents, forests, waterways and wildlife from cumulative environmental impacts.

8. ACCOUNTABILITY AND PUBLIC TRUST

The central issue is public trust.

New Brunswickers should not have to choose between a strong economy and a healthy environment.

Forestry, manufacturing, energy production and economic development are important to this province. But economic development must be accompanied by responsible environmental stewardship.

If government and industry maintain that current practices are safe, sustainable and adequately regulated, then the evidence supporting those conclusions should be readily available to the public.

Residents should be able to see:

- What is being emitted;
- What is being applied;
- What is being harvested;
- Where it is happening;
- What is being monitored;
- What violations have occurred;
- What enforcement has followed;
- And what measures are being taken to prevent future problems.

CONCLUSION

This complaint is ultimately about the right of New Brunswick residents to live in communities with clean air, healthy forests, protected waterways and a government that is transparent and accountable about environmental decisions.

The province's natural environment belongs to all New Brunswickers, not simply to the companies and industries that use its resources.

I therefore respectfully request a written response addressing the concerns and requests outlined in this complaint.

I also request links or copies of the relevant environmental approvals, monitoring data, emissions information, forestry records, glyphosate-use information, complaint records and enforcement information necessary for the public to independently evaluate the province's environmental performance.

Clean air, healthy forests and thriving communities should not be treated as competing interests. They are fundamental public assets that deserve protection.

Respectfully,

Marie-Soleil Seshat Landry
CEO, Landry Industries

Atmospheric Burden and Regulatory Capture: A Comprehensive Assessment of Irving Industrial Operations on Air Quality and Public Health in New Brunswick

Industrial Architecture and Point-Source Emission Profiles

The atmospheric chemistry of southern New Brunswick is largely defined by the industrial footprint of the Irving conglomerate, an integrated corporate network with operations spanning petroleum refining, marine logistics, chemical pulp production, and paper manufacturing¹. The operational centerpiece of this industrial matrix is the Irving Oil Refinery in Saint John, which constitutes the largest crude oil processing facility in Canada, maintaining a nameplate capacity of approximately 320,000 barrels per day¹. The refinery is the primary stationary point source of both greenhouse gases (GHG) and criteria air contaminants (CAC) in the province². Data submitted to Environment and Climate Change Canada's National Pollutant Release Inventory (NPRI) and the Greenhouse Gas Reporting Program demonstrates that the refinery releases approximately 3 million tonnes of carbon dioxide equivalent (CO₂e) annually⁴. This volume consistently exceeds the emissions of provincial electrical utilities, including the Belledune coal-fired station and the Coleson Cove generating facility, establishing the refinery as the single largest contributor to provincial atmospheric emissions⁴.

In addition to greenhouse gases, petroleum processing generates criteria air contaminants and hazardous air pollutants (HAPs), including sulphur dioxide (SO₂), nitrogen oxides (NO_x), fine particulate matter (PM_{2.5} and PM₁₀), carbon monoxide (CO), and volatile organic compounds (VOCs)⁷. National Pollutant Release Inventory filings document that the refining complex releases airborne toxic chemicals and carcinogens into adjacent residential communities, notably benzene, polycyclic aromatic hydrocarbons, nickel, lead, and arsenic². Benzene emissions represent a severe localized occupational and public health concern due to the compound's volatility and established classification as a Group 1 human leukemogen². Ambient air monitoring downwind of refinery infrastructure has recorded benzene

concentrations reaching 0.45 parts per billion (ppb), a level more than three times higher than the ambient air quality criteria enforced in comparable Canadian jurisdictions, such as Ontario's threshold of 0.14 ppb¹¹.

Complementing the petroleum refining sector, J.D. Irving, Limited operates major pulp, paper, and forestry processing facilities that discharge distinct chemical emissions into the regional airshed³. The Irving Pulp & Paper Reversing Falls mill and the adjacent Irving Paper mechanical mill in west Saint John, along with Lake Utopia Paper in Charlotte County, represent major stationary sources of particulate matter and reduced sulfur compounds⁴. The kraft chemical pulping process utilized at the Reversing Falls mill relies on the sodium hydroxide and sodium sulphide digestion of wood chips, generating large volumes of Total Reduced Sulphur (TRS) gases¹⁴. Process characterization indicates that these non-condensable gas streams consist of methyl mercaptan (CH_3SH), which frequently comprises over 50% of the total TRS volume, alongside hydrogen sulphide (H_2S), dimethyl sulphide (DMS), and dimethyl disulphide (DMDS)¹⁶. While provincial operating permits regulate TRS primarily to prevent acute physiological toxicity, these sulfurous compounds possess extremely low human olfactory detection thresholds, causing persistent and noxious odours across the urban core of Saint John¹⁴.

Facility and Location	Industrial Classification	Dominant Atmospheric Contaminants	Reported Release Quantities and Regulatory Benchmarks
Irving Oil Refinery (Saint John)	Petroleum Refining & Petrochemicals	CO_2e , SO_2 , NO_x , $\text{PM}_{2.5}$, VOCs, Benzene, Heavy Metals	~3,000,000 t/yr CO_2e ; SO_2 and NO_x capped at 4,500 t/yr ⁴
Irving Pulp & Paper (Saint John)	Kraft Chemical Pulp Mill	Total Reduced Sulphur (TRS), H_2S , CH_3SH , SO_2 , $\text{PM}_{2.5}$	95,257 t/yr CO_2e ; primary point source of urban TRS odor ⁴

Irving Paper Limited (Saint John)	Newsprint & Mechanical Pulping	PM _{2.5} , PM ₁₀ , SO ₂ , NO _x , Combustion Gases	Major industrial combustion source in Southern Air Zone ⁴
Lake Utopia Paper (Charlotte County)	Corrugating Medium Pulp Mill	SO ₂ , TRS , PM _{2.5} , Organic Particulates	Monitored under provincial air approvals via Rte 780/785 stations ¹⁰
Irving Marine Terminal (East Saint John)	Hydrocarbon Logistics & Transshipment	Fugitive VOCs , Benzene, Petroleum Hydrocarbons	Chronic fugitive venting; VRU offline 37% of 2012–2015 operating window ¹³

The geographic concentration of these industrial assets produces an asymmetric distribution of criteria air contaminants within New Brunswick². Historical data from the National Pollutant Release Inventory illustrates that industrial point sources in Saint John have released between 500 and 800 metric tonnes of fine particulate matter (PM_{2.5}) per year, whereas the provincial capital of Fredericton reported fewer than 50 metric tonnes annually, and the city of Moncton reported negligible industrial point-source discharges⁷. This spatial concentration exposes the population of the lower Saint John river basin and coastal zone to an elevated atmospheric baseline of combustion byproducts, volatile aromatics, and sulfur gases¹⁰.

Meteorological Interactions, Dispersion Dynamics, and Unregulated Fugitive Discharges

The biological and atmospheric impact of Irving's industrial emissions is amplified by the physical geography and coastal meteorology of southern New Brunswick¹⁴. Saint John is situated along the Bay of Fundy, where the continuous interaction between cold marine water and warmer continental air masses regularly triggers low-level temperature inversions and dense coastal fog¹⁴. These atmospheric inversions create a physical boundary that restricts vertical mixing within the local airshed, preventing stack plumes and low-elevation industrial emissions from dissipating into the upper troposphere¹⁴. Consequently, criteria air contaminants, toxic metals, and reduced sulfur gases become trapped in residential valleys and low-lying coastal neighborhoods, including Champlain Heights, Forest Hills, Red Head, Silver Falls, and the West Side⁹.

Beyond baseline continuous stack emissions, surrounding residential communities are subjected to episodic discharges and fugitive releases caused by process upsets, maintenance

operations, and containment failures⁹. The Fluid Catalytic Cracking Unit (FCCU) at the Irving Oil Refinery has historically been a recurring source of uncontrolled particulate emissions¹². During unit startups, shutdowns, or sudden mechanical failures, catalyst fines comprising synthetic silica-alumina structures and associated trace process chemicals have bypassed electrostatic precipitators, resulting in particulate fallout across east Saint John neighborhoods⁹.

Operational Event and Date	Primary Facility Involved	Nature of Discharge and Chemical Composition	Dispersion Pattern and Impacted Receptors	Administrative Findings and Regulatory Response
FCCU Catalyst Release (August 2010)	Irving Oil Refinery (Saint John)	Silica-alumina catalyst fines; grey/white gritty dust	Five-kilometer dispersion radius covering Silver Falls, Champlain Heights, and Loch Lomond ¹²	Provincial review identified three unnotified discharges; no statutory penalties; deemed non-hazardous ¹²
Vapor Recovery Downtime (2012–2015)	Irving Marine Terminal (East Saint John)	Hydrocarbon vapors, Benzene fractions, VOCs	Fugitive venting into coastal airshed during marine export vessel loading operations ¹³	Investigative reporting revealed unit non-operational 37% of time; informal remediation without charges ¹³
Particulate Deposition Event (November 2017)	Refinery FCCU (Saint John)	Catalytic cracking particulate matter ("white snow")	Heavy fallout coating residential homes, vehicles, and vegetation in Red Head and Forest Hills ¹²	Company issued written apologies and \$30 fuel cards; regulator characterized event as an aesthetic

				"nuisance" ¹²
Grainy Emission Event (2018)	Refinery Main Complex (Saint John)	Unidentified black, grainy carbonaceous matter	Ground-level particulate fallout throughout residential Champlain Heights ⁹	Corporate letters issued to residents; specific chemical constituents not publicly disclosed by the department ⁹

Containment failures have also compromised marine transshipment and storage infrastructure¹². At the Irving Marine Terminal in East Saint John, millions of barrels of refined gasoline, distillates, and crude feedstocks are transferred annually¹³. Operational evaluations revealed that the terminal's Marine Vapor Recovery Unit (VRU)—installed specifically to capture volatile hydrocarbon vapors and mitigate carcinogenic fugitive benzene plumes during vessel loading—experienced persistent mechanical downtime, remaining inoperable for 37% of the operational period between December 2012 and March 2015¹³. During these periods, uncombusted volatile organic vapors were vented directly into the coastal atmosphere¹³.

Epidemiological Consequences and Environmental Health Disparities

The prolonged atmospheric exposure of the Saint John population to industrial air contaminants has produced documented public health disparities². Epidemiological investigations conducted by the Conservation Council of New Brunswick (CCNB), utilizing diagnostic registries from the New Brunswick Cancer Network and Statistics Canada vital statistics, demonstrated that Saint John residents experience elevated rates of respiratory oncology compared to control populations in other urban centers². Specifically, incidence rates of lung cancer among Saint John residents were established to be 40% to 50% higher than those recorded in Fredericton and Moncton, and between 30% and 38% higher than the overall provincial average². A critical epidemiological aspect of these findings is the distribution of behavioral risk factors, particularly tobacco consumption². Rather than elevated cancer rates being explained by higher regional smoking rates, public health survey data confirmed that adult smoking rates in Saint John were lower than or equivalent to provincial and national averages during the study periods¹². This indicates that lifestyle confounders alone cannot account for the statistical elevation in lung malignancies, pointing toward chronic exposure to environmental toxicants—specifically airborne polycyclic aromatic hydrocarbons, volatile organic carcinogens, and catalytic metal dusts—as a significant contributing factor².

The physiological mechanism of fine particulate matter ($PM_{2.5}$) involves deep alveolar penetration, where particles smaller than 2.5 microns cross the lung-blood barrier, inducing systemic inflammatory responses, cellular oxidative stress, and vascular endothelial damage⁷. In the Saint John airshed, ambient particulate matter carries adsorbed surface condensates of heavy metals, uncombusted hydrocarbons, and sulfur compounds emitted by refining and pulping complexes². The World Health Organization and Health Canada maintain that there is no threshold below which $PM_{2.5}$ exposure is free of adverse health effects, meaning chronic exposure to baseline industrial emissions increases the incidence of ischemic heart disease, chronic obstructive pulmonary disease (COPD), and premature mortality⁷.

Epidemiological and Health Exposure Parameter	Saint John Industrial Airshed (Zone 2)	Moncton / Fredericton Control Zones	Comparative Ratio and Clinical Significance
Male Lung Cancer Incidence	38% to 51% above provincial average ²	Matched to baseline provincial norm ²³	Statistically significant clustering linked to long-term toxicant inhalation ²
Industrial Air Pollution Multiplier	Baseline industrial core (1.0) ¹⁹	Moncton: 1/243; Fredericton: 1/38 ¹²	Saint John experiences 38× to 243× higher industrial release density ¹²
Downwind Ambient Benzene Levels	Peak levels up to 0.45 ppb [cite: 12]	Trace baseline background ¹²	Exceeds Ontario health guidelines (0.14 ppb) by more than 300% ¹¹
Population Tobacco Smoking Rates	Comparable to or below provincial rates ¹²	Standard provincial baseline ²⁰	Confirms elevated lung cancer cannot be attributed solely to smoking ²
Avoidable Mortality Classification	Top ranked for avoidable respiratory deaths ²⁷	Lower per-capita avoidable death rate ²⁷	High prevalence of avoidable pulmonary mortality

			linked to environment ²⁶
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In addition to carcinogenic risks, chronic exposure to Total Reduced Sulphur gases from the Reversing Falls pulp mill causes persistent neuro-sensory and respiratory irritation in West Saint John¹⁴. Although regulatory bodies have often treated ^{TRS} exposure primarily as an aesthetic issue, medical literature demonstrates that continuous exposure to environmental ^{H₂S} and methyl mercaptans induces clinical symptoms, including chronic cephalea (headaches), ocular mucous irritation, persistent nausea, and sleep disruption, while aggravating pre-existing bronchial asthma in vulnerable pediatric and geriatric populations¹⁴.

Structural Asymmetries in Monitoring Networks and Institutional Oversight

The administration of air quality monitoring in New Brunswick reflects an asymmetry between public oversight and industrial self-monitoring¹⁰. Under the provincial Clean Air Act, the Department of Environment and Local Government (^{DELG}) oversees ambient monitoring across three geographic air zones¹⁰. However, within the Southern Air Zone—which contains the highest density of heavy industry in Atlantic Canada—the physical monitoring infrastructure is predominantly owned, maintained, and operated directly by the regulated corporate entities¹⁰. Of the 14 continuous air monitoring stations stationed in the Greater Saint John industrial corridor, 10 are owned and managed by Irving enterprises, primarily Irving Oil and Irving Pulp & Paper, while the provincial government operates only 4 public reference stations¹⁰. This administrative structure delegates ambient telemetry collection, fenceline sensor calibration, and preliminary data validation to the corporate operators². Consequently, public access to real-time, independent validation of volatile organic compound plumes, short-term flaring releases, and fugitive emissions remains restricted²⁸.

Monitoring Station Name	Operating Authority	Geographic Placement	Monitored Chemical Species	Primary Surveillance Objective
Champlain Heights Elementary	Irving Oil Limited	111 Champlain Drive, Saint John	PM _{2.5} , SO ₂ , TRS , VOCs [cite: 10]	Surveillance of refinery fenceline emissions at school site ⁹

Forest Hills	Irving Oil Limited	Mountain Road, Saint John	NO ₂ , O ₃ , PM _{2.5} , SO ₂ , TRS, VOCs, Met ¹⁰	Comprehensive downwind tracking of urban industrial plume ¹⁰
Grandview West	Irving Oil Limited	730 Bayside Drive, Saint John	SO ₂ , NO ₂ [cite: 10]	Monitoring of combustion gases near terminal and tank farms ¹⁰
Expansion Avenue / Silver Falls	Irving Oil Limited	Expansion Ave / 21 Champlain Dr	SO ₂ [cite: 10]	Dedicated boundary monitoring for refinery sulfur emissions ¹⁰
Bridge St / Milford / Sherbrook	Irving Pulp & Paper	West Saint John (3 Stations)	TRS [cite: 10]	Fenceline network tracking kraft pulping sulfur gas releases ¹⁰
Lake Utopia (Rte 780 / 785)	J.D. Irving, Limited	Route 780 / Route 785, Utopia	SO ₂ , TRS [cite: 10]	Perimeter surveillance of rural pulp and paper processing ¹⁰
Castle Street	DELG (Provincial)	8 Castle Street, Saint John	CO, NO ₂ , O ₃ , PM _{2.5} , SO ₂ , Met ¹⁰	Public urban baseline station in city center ¹⁰
West Side	DELG (Provincial)	476 Lancaster Avenue, Saint John	NO ₂ , O ₃ , PM _{2.5} , SO ₂ , TRS	Provincial surveillance station tracking kraft mill

			[cite: 10]	emissions ¹⁰
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This monitoring model operates alongside broader institutional entanglements between the conglomerate and provincial administrative bodies¹. The Irving group represents a dominant economic presence in New Brunswick, employing approximately one in every twelve workers across the province and up to one in three in Saint John, generating significant political leverage¹. The movement of personnel between corporate leadership and the provincial civil service is exemplified by former Premier Blaine Higgs, who served 33 years as an executive at Irving Oil before transitioning into provincial politics as Minister of Finance and subsequently Premier². Former corporate executives have similarly occupied strategic advisory posts within the Premier’s Office and the Department of Transportation and Infrastructure². These relationships have coincided with legislative and regulatory actions that favored corporate operations¹. In 2023, the provincial government passed legislation allowing Irving Oil to transfer the compliance costs of federal Clean Fuel Regulations—estimated at approximately 7 cents per liter—directly to retail petroleum consumers via a statutory "carbon adjuster" formula³. Concurrently, provincial environmental regulators have declined to introduce binding statutory ambient standards for airborne carcinogens such as benzene, maintaining an outcome-based compliance system that relies on broad guidelines rather than strict limits³. Public discourse regarding industrial pollution was historically shaped by the Irving family’s ownership of Brunswick News Inc., which maintained a monopoly over all three English-language daily newspapers (*The Telegraph-Journal*, *The Daily Gleaner*, and *The Times & Transcript*) alongside numerous weekly publications, until the assets were sold to Postmedia in 2022¹. Official inquiries, including the 1970 Senate Special Committee on Mass Media and the 1981 Kent Commission, noted the adverse democratic implications of this media concentration². This consolidation restricted investigative reporting on industrial air emissions, regulatory warnings, and occupational health concerns¹. Where air quality standards have been strengthened, the changes have largely resulted from sustained community interventions rather than internal regulatory initiatives⁹. The late citizen advocate Gordon Dalzell, working with the Saint John Citizens Coalition for Clean Air, challenged the operating conditions of the Irving Oil Refinery during its statutory five-year operating approval renewals⁹. Submitting a 200-page technical brief detailing 33 separate environmental and safety issues, Dalzell intervened as the sole public participant, successfully compelling the provincial government to enforce stricter regulatory caps⁹. These interventions resulted in mandatory 18% and 13% reductions in the refinery’s allowable annual limits for NO_x and SO₂—capping both at 4,500 tonnes per year—and forced the adoption of lower allowable thresholds for fine particulate matter⁹.

Environmental Governance Reforms and Airshed Remediation Pathways

The cumulative impact of Irving operations across petroleum refining, chemical pulping,

logistics, and forestry management presents an ongoing challenge for environmental protection and public health in New Brunswick². The spatial concentration of emissions within the Saint John basin, combined with coastal meteorological inversions, creates an elevated exposure profile for industrial air contaminants in nearby residential areas². The resulting health data reveals elevated rates of lung cancer and respiratory conditions that cannot be explained by tobacco use alone, highlighting the role of continuous exposure to industrial air pollutants². Addressing these environmental disparities requires a transition from isolated facility approvals toward a cumulative regulatory model²⁸. Meaningful modernization of New Brunswick's air quality governance requires the implementation of several foundational policy and structural reforms:

- **Public Governance of Monitoring Networks:** The provincial government must transition the 10 industry-operated monitoring stations in Saint John to independent public oversight under the direct management of the Department of Environment and Local Government or an independent scientific body, incorporating continuous public data feeds and lowered detection thresholds for toxic volatile organic compounds¹⁰.
- **Statutory Ambient Carcinogen Standards:** The province should enact legally binding ambient air quality standards for known chemical carcinogens, including benzene, 1,3-butadiene, arsenic, and polycyclic aromatic hydrocarbons, based on peer-reviewed health criteria rather than industrial feasibility models².
- **Independent Community Health Studies:** The Department of Health should conduct a multi-year, independent epidemiological assessment in Saint John, comparable to the 2005 Belledune health study, to evaluate clinical links between industrial point-source emissions and elevated rates of respiratory disease and cancer².
- **Automated Fenceline Surveillance:** Operating permits for refineries, marine terminals, and pulp mills should mandate continuous optical fenceline monitoring with automated, real-time public reporting protocols for hydrocarbon leaks, vapor recovery failures, and TRS spikes¹⁰.
- **Cumulative Airshed Emissions Capping:** Environmental regulators must replace single-facility reviews with airshed-wide cumulative emission limits, establishing caps on total combined loads of SO_2 , NO_x , $\text{PM}_{2.5}$, and VOCs across all industrial sources within the Southern Air Zone to align total atmospheric discharges with the ecological capacity of the regional environment⁹.

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