

Environmental Review Dec. 08, 2016

I have had some experience with both a Federal Environmental Assessment and a Provincial Environmental Assessment. I hope my comments will be helpful to the needs of this federal panel. Because of the failure of both Federal and Provincial Environmental Reviews, much pressure and hardship is being forced on small communities whether aboriginal or non-aboriginal. I have categorized my comments into four categories:

1. Build up Regulations around Habitat and Quality of Life for Citizens

I believe many Federal Laws and Regulations have been stripped from the Fisheries and the Navigable Waters Act, during the Harper government years and since these laws have not been reinstated, sustainable food and fishing for commercial purposes are being undermined due to the low threshold of protection. For example, it seems that there is no requirement on proximity of a project to important or endangered habitats. If there were, you would think it would be entirely impossible to initiate a project such as Pacific North West on Lelu Island in the heart of one of the richest salmon habitats of this coast, or for that matter, Nexen-CNOOC's LNG on Digby Island.

2. Transparency from the Ground and Water Up

Foreign owned companies have behind closed doors carried on meetings with governments, government agencies and other favoured companies such as pipeline producers, and have made decisions entirely without the knowledge of the human inhabitants that will be affected most. The multi-million dollar corporations are on our

doorsteps like old time door to door salesmen, trying to convince us that they can give us jobs. Our local governments such as Improvement Districts, Municipalities and Regional districts find out they have become targets as well. No amount of consideration is given to the communities' strongest objections; if they continue with their proposed project, the proponent is often taking our jobs away, while replacing them with others not compatible to us, and also taking our local governments' protection of its people.

Why is it that these companies are allowed to negotiate with the most vulnerable government entities, representing the people and the roots of democracy, and which have the most to lose and are critically dependent upon the sustainability of their resource environment? My friends that I have worked with on a provincial environmental review said I should talk about legacy or history. But priority for life all comes down to sustainable food and a healthy environment. Without them our community will dissolve and our small footprint will be stamped out by a fossil fuel giant, in our case, Aurora LNG project, expected to emit more GHG per year than the Tar Sands. It will produce 20-40 MTpa liquid natural gas. Next door approximately 5 km. away the PNW-LNG is slated to produce 6 million tonnes per annum and and emit 13.9 Mt of CO₂ per year. (Pembina Institute). Why is it that one LNG terminal can undergo a Federal Review and another one adjacent with even larger climate change emissions be signed off to the province? All Environmental Assessments need outside watchdogs.

3. Peer-Reviewed Science

The one positive outcome of the heavy concentration of Fossil Fuel banditry in this region is that excellent peer-reviewed scientific studies

have been conducted on the Skeena River Salmon and the Specific Sediment Properties of Flora Bank. These scientific studies should form the backbone of any environmental assessment. The hired scientists that work for the proponents should be the ones trying to argue the facts....or work within them. Shoddy or biased science is not what the Environmental reviews should be based on. The Canadian Government should have the highest regulations and standards put in place before the salesmen come to their door. Studies such as Prince Rupert's watershed study should have been done before any proponent gets a Permit for Export, let alone 14 permits. The first step should be social license and meeting all regulations in the affected communities. If the company wants social license they need to start with the smallest common denominator and there has to be room for the word "no".

4. Equal Opportunity, Equal Protection

As far as I know there are no grants available for small communities being faced with large environmentally destructive projects, under Provincial Assessment, such as Nexen's Aurora LNG on Digby Island. We are told many times that specific issues will be addressed in the application and there will be additional opportunities for public participation. What we say on paper, for draft purposes, for comments, for the whole process, does not stop the proponent. We are told that the issues will be addressed in the application. When we say the destruction of this habitat cannot be mitigated, they will continue to mitigate. It does not erase the destruction. We are told human health is a VC, a valued component, but the actions of the corporations prove that we are not or they would not continue the destruction of our habitat. We are told environments, social and human effects will be identified and assessed in the application, but assessment does not

help my community as I see it struggle, with scientific language, understanding of environmental review processes, differences of opinion on how to handle what seems to be a steam-rolling over our livelihood of one project after another, hell bent it seems on destroying the ecosystems we have relied on to create our small unique culture, our sacred places, our sustainable lifestyle. Our particularly quirky muskeg water is precious to us as an industry threatens our watershed; Water, fish and clean air represents to us what we need so we do not become a liability to the government.

There must be a way that all governments can share the responsibility of protection of our resources in a way that does not compromise the very livelihood of others. Transparency in every step and equal importance in the process may be an answer to a very simple question that my 7 year old granddaughter asks, "Why did they have to choose our home?"

Carol Brown