

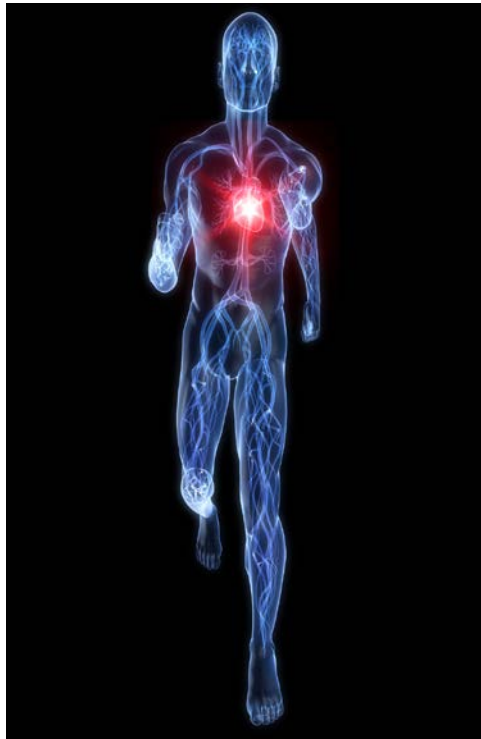
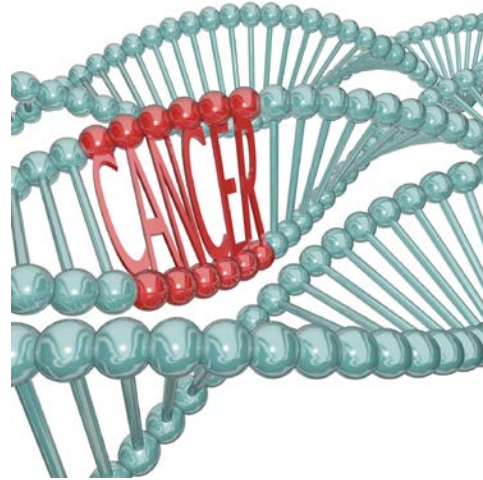
# **Presentation to the Panel Review Federal Environmental Assessment Process**



**Kamloops Physicians for a Healthy  
Environment Society**

# Webpage – an education tool on health impacts

[www.kphe.ca](http://www.kphe.ca)





# Health & the Environment

- Health is dependent upon
  - Air
  - Water
  - Soil
  - Food

AND

- Socio-economic security

“AND” not “OR”



# **Assumption #1:** A project would not be considered if very questionable in safety. Right?

**Reality:** a **precautionary principle** is not used for projects in Canada. The proponent does not need to prove “no harm”.

- Under FOI we learned the Medical Officer of Health for our region had a 9 page letter of concern not entered into proceedings.
- April 2013 our Provincial Health Officers passed a motion advising **full comprehensive health impact assessment** be required for large industrial projects in BC.

**Solution:** Align responsibilities and reporting structures such an important motion goes up a chain of command. Effect this motion into policy at the municipal, provincial and federal levels.

# Full Health Impact Assessments

- Public Health best practice
- The principal components of the HIA – screening, scoping, assessment, recommendations, reporting, monitoring and evaluation – are consistent with the BC Environmental Assessment Act.
- Considers positive and negative health impacts from economic, social, environmental, heritage, and cultural implications from a project.
- Meaningful public participation – should be an expectation at all levels
- Several jurisdictions in the world use HIA frameworks.



## **Assumption #2: We still have a Medical Officer of Health watchdogging this right?**

**Reality:** We have challenges in the Health and Environment Ministries – funding and demand mismatch.

- Public Health is under Ministry of Health, is challenged to watch dog big projects on top of regular jobs of Fentanyl overdose crises, contaminant leaks, water standards, catastrophe responses.
- Our local representative was re-org'd out of existence.
- The MHO and the Centre for Disease Control have significant capacity issues.
- The Ministry of Mining is relatively well-funded by comparison. Jobs focus by government makes for an imbalance.

**Solution:** Level the playing field. Set standards for the units of time available to focus on the review of applications and fund the affected Ministries proportionately. We cannot allow proponents to police themselves.



## **Assumption #3:** There is lots of time to review this right?

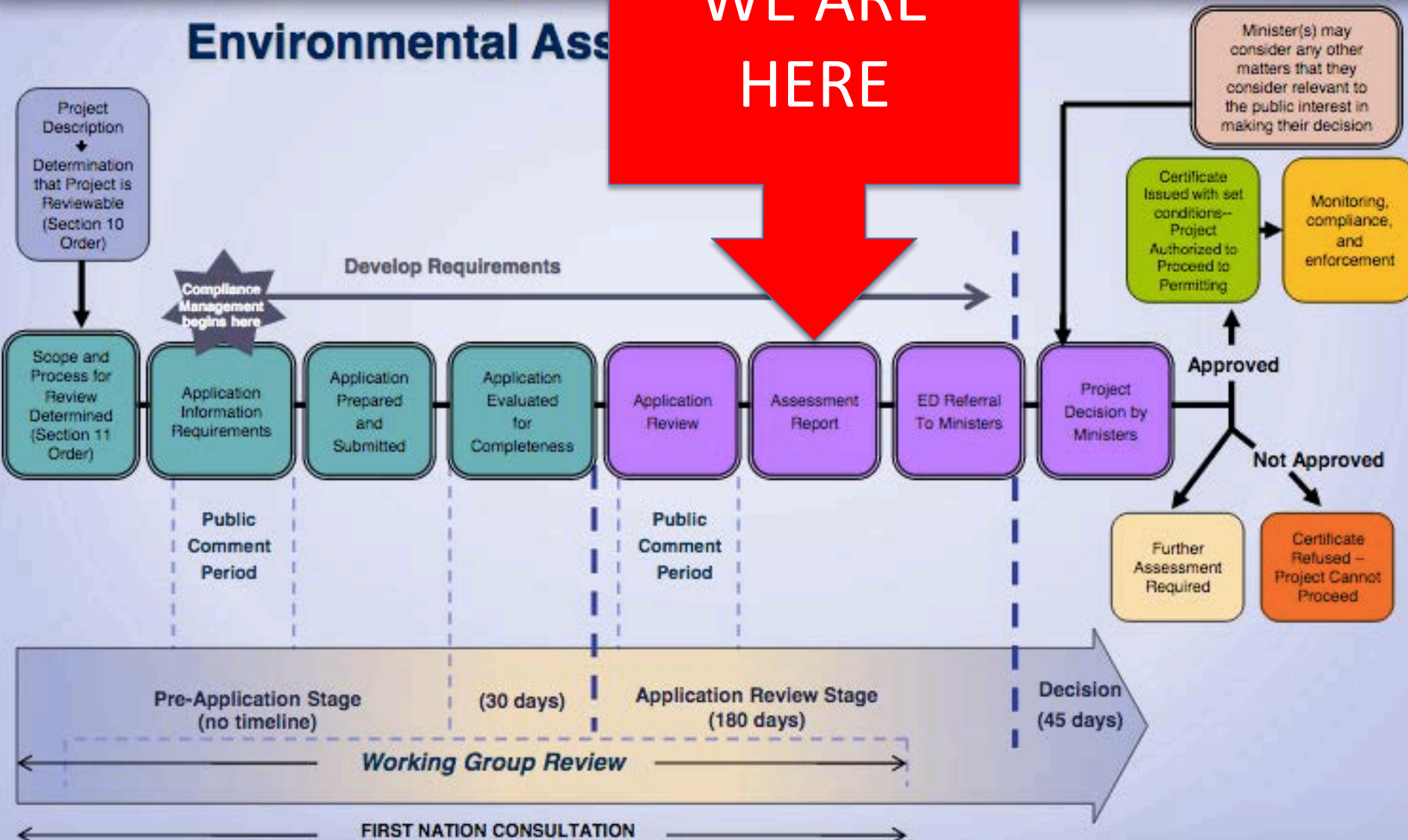
**Reality:** The proponent gets unlimited days and can stay the process at any point. The public gets 90 days and even with re-application, no additional days.

- Community groups have to go into “watch dog” mode without a budget
- “Go-fund-Me” is not really a solution
- “Hired guns” to critique these projects are criticized themselves as biased by the payer.

# Environmental Assessment Office

## Environmental Assessment Process

**WE ARE  
HERE**







**Assumption #3:** There is lots of time to review this right?

**Solution:** Level the playing field on time. If the proponent takes years to apply, the review could take equal time to reproduce the modeling or “studies” in the application.



## **Assumption #4: We would not be using models and calling them studies.**

### **Reality:**

- Models are used and numbers adjusted by assumptions
- Study a mine that already exists? 94% mitigation of all dust?
- The number needed to purport “zero harm” north of Aberdeen drive.
- Dust estimates, vibrations estimates, sound estimates . . . mines are not meeting their agreed upon numbers.
- Fines = not effective. Pay vs shutdown.
- Maybe they can never meet their theoretic targets?

**Solution:** New protocols need to be developed to require real life studies on real life projects and not rely of models with inherent errors and lack of post-operational accountability.



**Assumption #5:** Cumulative effects or combined effects of multiple projects is part of the process.

**Reality:** Each project “triggers” a review based on novel application and is not considered in tandem with other pre-existing projects. Expansion, once established, may not trigger a review that would have changed acceptance of the original proposal. This leads to a step-wise approval of projects with significant cumulative impacts.

**Solution:** Air, Water and Soil management must be set up to transcend political silos of municipal, regional, provincial jurisdictions.



## **Assumption #6:** The highest bar would be used to pass this project right?

### **Reality:**

- The standards of the HHRA at the Federal level (Hazards quotient 0.2) NOT used by the proponent, BC level of 1.0 allowed to be entered into discussion.
- There is a substantial lag in toxicity studies getting published in time to influence toxicity reference levels.
- Cadmium not included – known bio-accumulation agent.

### **Solution:**

- Mandated realistic compensation estimates
- Use a precautionary principle if unsafe, unproven, early / yet to be confirmed.



## Assumption #7: Consent is required to part of an unprecedented human study

**Reality:** No it is not.

- To prove there has been an impact, baseline studies before and after exposure is needed. These are not required. Who pays?
- Post-fact “proving harm” really occurred would need to know where you started from.
- Blood, hair, water, soil . . . Quite the human population study that is not required for the application.
- The “Benefits Package” or “Compensation Package” is not even close to the estimates from other real life situations.

**Solution:** Mandated public disclosure, realistic compensation estimates and a precautionary principle when the facts are not yet known.

**Thank you!**



**Kamloops Physicians for a Healthy  
Environment Society**