

From: Peter McCartney <email address removed>

Sent: June 23, 2016 6:44 PM

To: EA Review / Examen EE (CEAA)

Subject: Wilderness Committee Submission

To whom it may concern,

My name is Peter McCartney and I am the Climate Campaigner for the Wilderness Committee. Our organization has 60,000 supporters across the country and I write today to provide our comments on the draft terms of reference for the expert review panel of environmental assessments.

We have a number of serious concerns with the terms of reference as they currently stand. First and foremost among them is what seems to be a fundamental misunderstanding of or break from the purpose of environmental assessments.

The terms of reference refer to "identifying opportunities to avoid, eliminate or reduce a project's potential adverse impact." This does not, in our opinion, encompass the true purpose of a CEAA review.

An environmental assessment needs to determine whether or not a project should be built, not merely attach conditions to mitigate the environmental impacts. When projects are a foregone conclusion from the outset, it hampers participation within the process and erodes its credibility.

Beyond this significant flaw in the direction of this process, there are a number of novel things the panel must explicitly address. While environmental assessments have traditionally looked at biodiversity and water/air quality, a modern review process has additional factors to consider.

Many of the proposed projects in Canada have implications for the global climate at a time when the country has committed to trying to limit global warming to 1.5 degrees above pre-industrial levels. A real environmental assessment would consider all greenhouse gas emissions associated with any proposed project – including the carbon pollution from the eventual combustion of fossil fuel exports.

Megaprojects also have impacts on the human rights of Canadians, Indigenous Peoples in particular. Environmental assessments should include a review of these issues in order to understand what is at stake in a project.

Finally, industrial-scale projects have consistently been ignored by the environmental assessment process because they are distributed in scope. Logging is a striking example of a process which does not trigger a federal review, but where the cumulative environmental impacts are immense.

Terms of reference for the panel should include explicit instructions to address carbon emissions, human rights and cumulative impacts of proposed projects. This would help to bring Canada's environmental laws up to the standard the public expects.

Thank you,

Peter McCartney

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Peter McCartney | *Climate Campaigner*
[Wilderness Committee](#) | *Keeping it wild for over 35 years*
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