

**From:** Greg Brown <contact information removed>  
**Sent:** July 18, 2016 10:57 AM  
**To:** EA Review / Examen EE (CEAA)  
**Subject:** Greg Brown's Submission to the Review of EA Processes

Monday, July 18th, 2016

Review of Environmental Assessment Processes  
Canadian Environmental Assessment Agency  
160 Elgin Street, 22nd Floor, Ottawa ON K1A 0H3

Dear Expert Panel,

I commend the Government Government for soliciting input before its review of the Environmental Assessment processes.

I make the following comments as a resident of northwestern BC and as someone who have engaged on a few EA processes as an individual.

It is time for the Canadian EA processes to clean up, to evolve and mature. “Sustainability” as originally defined by the Brundtland Report was laudable goal and yet the processes that we use to strive for sustainable devleopment continually need to be upgraded to meet the challenges of the current and future generations. The key challenges that I see for next iteration of the EA process are the following: (1) incorporation our global and national climate change goals, (2) large scale ecosystem health and resiliency in the face of a changing climate, and (2) community and cultural well-being in the face of a more globalized economy and a changing climate. These are relatively new challenges faced by Canadian communities and the review of the EA processes is a great place to upshift the conversation and the subsequent changes needed in our federal legislation.

### **The Appropriate Scale**

All projects should be review at the appropriate scale and always within the context of an appropriate higher level plan.

For example, large oil pipelines and LNG facilites have an eventual effect on the climate (both upstream production and downstream use) and therefore should be evaluated within the goals and objectives the Paris Agreement (UNFCCC) and Canada's commitment within.

Large open pit mines have an effect on watersheds, socio-economics of communities, and large ecosystems and therefore should be evaluated within a regional plan (a plan that considers level of industrial activity, wilderness/watershed/ecosystems health, and socio-economic impacts). For an example of this, see the patch work of EA work that was done for the metal mines in Northwest British Columbia over the last 15 years. There was a dearth of information and analysis on the cumulative impacts of all these mines and other activity (ex power generation, forestry, ect..). I think the question of cumulative impacts begins with a regional planning. There needs to a trigger for when this higher level of planning is required. Research and analysis needs to by done to set these triggers.

Another example of the need for regional planning is all the pipelines (both oil and natural gas) that have been assessed in northwest BC. There was never a planning exercise put in place by government to figure out the best route (or routes) for large pipelines to traverse the coastal mountain ranges. While all the different EA's produced lots of short term work for EA teams, the process missed the opportunity to do coordinated planning between government and industry.

### **The Appropriate Authority**

Who controls the process of overseeing an EA is very important. While bound by professional and legislative checks and I have personally found the NEB not a good body to oversee an EA process. My experience with the NEB was with the Northern Gateway pipeline project. Even though the panel members and the NEB staff did their best to be professionals, you could feel the adversarial approach that the whole process took. It is my belief that this is structural problem of the NEB and stems from the situation that the NEB is a "captured regulator". No amount of changing the process will rectify a situation like the Northern Gateway Project. A different federal authority would be required to oversee the whole assessment with the NEB as a participant.

### **The Appropriate Resources for Communities**

Affected communities need time and resources to properly engage with EA processes. Depending on the size and scope of an EA, there needs to be an assessment of who can and who is willing to get engaged with an EA process at the local and regional scale. And then, these people/groups need to be provided the means to engage with the process in a productive manner while not have to rely on their existing resources (time, money, etc) to engage. Rather, these individuals/groups should be provided a means of support for their work in pursuing the public good. The groups that come to mind include private citizens, citizens groups, Health Authorities, aboriginal communities, aboriginal organizations, and last but not least local and regional governments.

Thank you for accepting my submission.

Greg Brown  
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