

From: Arthur Entlich <contact information removed>
Sent: July 19, 2016 2:55 AM
To: EA Review / Examen EE (CEAA)
Subject: Comments regarding Expert Panel on Environmental Assessment Process

To the Panel:

Let me begin my commentary with three statements:

- 1) The prior federal government administration allowed its ideologies, sources of private financing, economic interests, and personal biases over the prior ten years to do everything in its powers to decimate and diminish every aspect of the scientific, indigenous and public democratic principles of environmental law and ethics, concern and support for Canada's and our planet's well being, and the protection of the fragile balances which are required to maintain a viable living world, and saw anyone who objected to their agenda as an enemy of the state.
- 2) The natural environmental balance of our planet is complex and nuanced, and does not fit into specific man-made classifications of functionality, governmental ministries, industrial segments, or other self-contained concepts we have created, but instead is a complex web which is woven between and among living organisms and their environment, including the land, water bodies, atmosphere, weather patterns and climate of this planet, all of which influence one another.
- 3) As someone rather concerned about these matters, who has been involved in numerous prior engagements with government agencies regarding similar issues, and someone who is regularly in communications with numerous advocacy groups, I am surprised to learn that not only was the public input regarding this phase only a 30 day process, but that I have only by chance come across this invitation to comment 2 days prior to closure, indicating poor communication with the population.

This commentary may be less polished than I would have liked, due to the time limitations for submission. I apologize for that and hope, in its rather unfinished format, that it still articulates my concerns and sentiments adequately.

Proper analysis and governmental response regarding environmentally sensitive matters cannot be limited to a few ministries. Human activity impacts our planet, the environment, and other species by a wide variety of decisions we make on a daily basis. Each of these human elements is influenced by many interactive forces, many of which are influenced by governmental and social systems, some of which I suggest below in parentheses. We, as a species, make very high demands upon our environment, and most everything we do has real impact upon it. These include our population numbers, (fertility, religion, health care, birth control, immigration) our distribution (migration, economic development, job opportunities, access to land or housing, cost of living), the type of housing we live in and the materials they are made from (industry, real estate, forestry, technology, resources, geography), how we source our energy (industry, mining, resources, innovation, technology, research, climate), the type of work we do (job creation, technology, innovation, manufacturing, resources), the foods we produce, collect and consume (agriculture, aquaculture, science, research, genetic manipulation, pesticides and fertilizers, water use) how we treat ourselves medically (medicine, pharmacology, lifestyle, science, technology), how we transport ourselves and the things we need or desire (transportation, technology, energy sources, land use, resources,

pollution) the technology we surround ourselves with and what source materials we use to make those things (industry, innovation, technology, mining, manufacturing) where we place our waste materials and discards (recycling, innovation, science, research, manufacturing), and even how long we live and where we are delivered when we die (social values, religion, traditions, legislation, land use).

All of those aspects of human existence alter the environment, as do many others. Suddenly, one realizes our impact on the environment is not limited to a small number of governmental agencies and ministries, but instead is threaded through most decision making by government.

It is possible that each ministry needs its own environmental division to oversee and provide input about how that segment of human interaction alters the natural environment. Environmental assessment is no longer an adjunct to a few specific activities of humans and government concern. If we, the people of Canada, are serious about evaluating our impact on this planet, or even our part of the planet, and wish to effectively understand and reduce that impact, we need to not just revamp a couple of ministries and bodies of government, we need to seriously engage in proper understanding and altering our behaviours in many aspects of our lives and government's involvement. Every major decision we make has consequences. Many may be unknown, or have unintended consequences, but many may also be reasoned, considered and understood, allowing us to avoid missteps, and as such, saving lives, human and otherwise, and costs.

Correcting errors can be costly. If you want to look for examples, just consider the ultimate cost of climate change. Much of what we have experienced to date, as well as that which is yet to come, might have been avoided had proper consideration and regulation been implemented earlier.

The full costs of climate change are still not fully known, but inevitably it will include war, social strife, extreme weather, crop and other food source failures, ecological collapses and extinctions, large insurance payouts as infrastructure is damaged, loss of life, shortages of fresh potable water supply, disease and epidemics and other yet unforeseen consequences.

Hopefully, some of this can be mitigated by planning ahead, but that requires each decision be well considered, and that we think beyond the immediate "advantages" into future results.

Sure, we can allow private industry to sell some of the most polluting fossil fuel on the planet to other countries until no one will buy it anymore, at any price, and risk ocean spills and pipeline ruptures. We can then pay out of public pockets the cost of remediation and reclamation of that land or water, removal of the no longer functional wells and pipelines, as we try to reverse the impact we have allowed to be created, under the guise of revenues from royalties, jobs, investment income, and such.

We can allow rights to fish farms to produce sickly species, or the wrong species of salmon geographically, which go on to shed lice and viruses, and place contaminated waste into ocean waters and infect the wild species, which provide food to layer after layer of other critical species, allowing for a collapse in the wild stocks. Again, we will use public funds to try to reverse this, after the fact. We could have simply required all fish farms to use containment tanks rather than open pens to avoid this cross contamination to begin with, and if the industry was unwilling to accept such requirements, then they could find elsewhere to do their damage.

We can either continue to allow specific pesticides to be used on seeds which damage or kill pollinating insects, until their numbers become too low to continue to pollinate food crops and other plants, or we can ban these pesticides now and return to safer alternatives.

We can sign trade agreements which weaken our sovereignty and make us more vulnerable to the demands of other nations which do not have the same level of concern or understanding for the environment, or who force us to sell our industries to off shore owners who are less concerned about the well being of our lands.

We can continue to pursue fossil fuels like oil, natural gas and coal, all of which we know place us closer to that agreed upon 2 degree C limit for climate change, or we can invest in newer innovation like solar, wind, tide, geothermal and other technologies which are greener and more sustainable and will help to spawn new industry.

We can build homes and factories which make best use of materials and conservation techniques, and retrofit those which require it, or we can continue to build unsustainable architecture which will need to be retrofitted or replace when we become more serious about those issues.

We can allow greedy multinational companies to bottle our groundwater supply for pennies on the gallon, and then transport and sell it at huge profits while even further adding to the carbon footprint, or we can regulate that water as a public resource to be protected for all people to use in a reasonable and equitable fashion.

If government is serious about having balanced discussion about these issues to reach a fair consensus, a change in the approach of forming consensus if required.

Industry is motivated by basically one consideration, and that is profit. A “good” business is one which generates high profits for the stakeholders, and investors. Government must not be satisfied with just promises of jobs, royalties, profits and income without also considering environmental impact, impact on human health and well being, future costs and potential injury, and so forth. Further still, there is yet another great imbalance. For industry, cost of influence peddling, think tanks, white papers, supportive science and research, lobbyists and such are simply part of doing business, and a tax write-off much of the time.

They can also more readily access members of upper government for private meetings, they often employ recently “retired” public officials, and they have paid advisors and PR specialists to influence public opinions. They can also influence decisions by offering large donations to causes dear to an individual or political party. Industry commonly uses millions of dollars toward advancing ideas with the possible outcome of billions of dollars in rewards. They often have nearly unlimited funds for larger projects, some finances may even come from government and taxpayers through grants and loans. The general public, interveners, First Nations, NGOs, and others, often have very limited budgets to engage in such processes. They rarely can afford the legal, travel and publicity costs, and they only very rarely can afford resources toward funding research. Often the general public must rely upon volunteer efforts or the good will of donors or experts to mount any campaign to oppose industrial forces. This creates a very unbalanced state of affairs, leaving the general public at a great disadvantage. If government does not sponsor fully unbiased scientific and economic research, industries' arguments will always appear better on paper. We need truly independent scientists and economists to present their findings in a fully unbiased manner.

And finally, government has to task itself at developing realistic economic value to a pristine environment, clean water and air, a predictable climate, and the physical and mental health these things afford our population, as well as its attraction to tourists seeking such things, etc. What is the value of the stress relief of not worrying about the consequences of climate change. What is the impact on children that they do worry about such things?

We can easily determine the value of a tree, based upon its species, size, and how many board feet can be harvested from it. However, what is that tree worth if it stays where it is and continues growing, creating a larger carbon sink, producing oxygen, a place for animals and plants to live on or within, where it reduces soil erosion, where it possibly produces a food source year after year? What value does it have to an artist to paint its image, or anyone to walk among it and others around it? If we are going to continually reduce our world to its economic value, then we need to come up with realistic economic values for those things remaining as they are, rather than being consumed, converted into some other product, or being degraded by pollution or over-use.

Whether each government division requires its own environmental assessment team, or if a new mentality needs to be embedded in each employee which includes these concerns, regardless of the matter, or if a centralized vetting agency is needed to review each major decision referencing environmental impact, I am not sure. However, if our government is serious about the environmental consequences of decision making within government, it should not be necessary to await a backlash by the public or from NGOs. Just as every government decision requires a budgetary process before it can be approved, environmental impact should become a standard in policy and decision making.

Sincerely,

Arthur Entlich
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