



**Comments provided by:**

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**&**

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Canadian Environmental Assessment Review-[CEAA.EARReview-ExamenEE.ACEE@ceaa-acee.gc.ca](http://ceaa-acee.gc.ca).

ADIMS and DIRA MG's comments on Canada's Environmental and Regulatory Processes

Both the Association of Denman Island Marine Stewards (ADIMS) and the Denman Island Residents Association Marine Guardians Committee (DIRA MG's) share the same passion to protect our shores and waters and represent the residents of an Islands Trust island whose local government mandate is to "Preserve and Protect" the island's unique environment of gulf islands. ADIMS and the DIRA MG's fully supports the CEA review and have watched the steady decline of environmental protection since 2012 when resource extraction took precedence.

ADIMS and the DIRA MG's share the same concerns with CEAA 2012 as West Coast Environmental Law and are as follows;

⑨ A designated Project List creates legislative gaps and creates additional ways the proponents can structure project proposals so that environmental assessments are not required. It also focuses on individual projects as opposed to potential environmental impacts or potential cumulative impacts of several projects and makes it impossible to anticipate new types of projects that while they may be proposed and carried out, would not be identified in the project list and therefore there would be limited ways to ensure the impacts of new technologies or projects are assessed.

⑨ designated physical activities need to be identified based on legal triggers and environmental impacts (in a similar way to the previous CEAA), not simply because that specific project at its particular threshold is listed.

⑨ The Responsible Resource Development Plan needs re-working so that designated physical activities are identified based on legal triggers and environmental impacts (in a similar way to the previous CEAA), not simply because that specific project at its particular threshold is listed. RDPA should be amended to include a section that allows for a citizen to request a particular project (or group of projects that pose significant cumulative impacts) be assessed. This would allow for a way to capture exceptional projects that have particular local environmental, social, cultural or economic impacts that are not or cannot be factored into the limitations of the pre-existing listed projects. Also, the following should be included in the list:

\*constructing, operating, modifying or decommissioning marine or freshwater aquaculture facilities;

\*any proposed refurbishment or life extension of an existing nuclear generating station;

\*importing, exporting or transporting low-, intermediate-or high-level radioactive wastes from a Class IA or IB

nuclear facility to any other public or private facility for storage, processing, recycling or disposal purposes;  
\*constructing, operating, modifying, or decommissioning an ethanol fuel production facility;  
\*constructing, operating, modifying, or decommissioning oil or gas development 12 projects involving the following technologies:  
hydraulic fracturing (fracking);  
exploratory drilling or seismic surveys for off-shore oil or gas deposits; and steam assisted gravity drainage oil sands projects;  
\*constructing, operating, modifying, or decommissioning facilities for generating electricity from geothermal power or off-shore wind farms;  
\*constructing, operating, modifying or decommissioning buildings or infrastructure within protected federal lands (i.e. National Parks, National Park Reserves, National Marine Conservation Areas, National Wildlife Areas, Marine National Wildlife Areas, Marine Protected Areas, Migratory Bird Sanctuaries, etc.), such as:  
building new roads or rail lines, or widening/extending existing roads or rail lines; or  
building or expanding golf courses, ski resorts, ski trails, visitor centres or ancillary facilities; and  
constructing, operating, modifying or decommissioning of a diamond mine  
chromite mine;  
\*any material modifications of a project (proposed, under construction or in operation or decommissioning stage);  
\*any federal lands and to include the disposal of nuclear waste regardless of the proposed location for disposal (requires an amendment to section 33 of the Schedule to the RDPA); and  
\*all physical activities that would be assessed through their inclusion in the previous Inclusion List Regulations (SOR/94-637);  
⑨ Rights of way need to be re-examined for projects that might cause environmental damage such as: electrical transmission lines, oil and gas pipelines, railway lines, and highways.  
⑨ All proposed mines should be considered for CEAA 2012 environmental assessment regardless of the size and production capacity of the mine.  
⑨ The RPDA also needs to include: construction or expansion of golf courses; construction or expansion of ski resorts; construction of new roads; widening or existing roads; expansion of rail lines; construction or expansion of visitor centres and facilities; and construction or expansion of buildings outside town sites.  
ADIMS and the DIRA MG's do not support the removal of any activity or project currently listed in the RDPA.

Thank you for the opportunity to comment. We hope that with our new federal government will provide new opportunities to protect what makes Canada a world leader- respect for the environment. Without a healthy, robust and diverse environment, there can be no growth in the economy.

Respectfully, Barb Mills & Edina Johnston

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