

July 20, 2016

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

Attn: Canadian Environmental Assessment Agency and Honourable Catherine McKenna, Minister of Environment and Climate Change

**Re: CEAA Review Expert Panel Draft Terms of Reference – Comments On Behalf of the Northern Health Authority of British Columbia**

Please receive the following comments on the Expert Panel draft Terms of Reference (ToR) for the CEAA review on behalf of the Northern Health Authority of British Columbia. Thank you for the opportunity to participate in the review of federal Environmental Assessment (EA) processes.

This submission has been prepared in concordance with Northern Health's commitment, statutory and ethical obligation to build and strengthen the health of the people we serve in Northern British Columbia. The World Health Organization's definition of health states that "health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity<sup>1</sup>". In line with this definition, Northern Health is fully committed to ensuring the preservation of the dignity (physical, social and mental health and wellness) of our people and the protection of their built and natural environment (determinants of health, services and infrastructure, land, air and water). Our comments contained herein are a reflection of this commitment.

Under our mandate of protecting and promoting the health of our Northern communities, our Office of Health and Resource Development has been contributing to the EAs of a number of projects in our region. Based upon this work, we feel that it is important that the scope of natural resource management decision-making processes captures health and socio-economic considerations.

Please also receive our enclosed *Standard Working Group Comments and Recommendations for Provincial Environmental Assessments* document as a supplemental submission on our behalf. While it was designed for our involvement in provincial EAs, it summarizes our comments and concerns for EAs. It highlights the importance of managing the health and socio-economic impacts of resource development projects in order to protect and promote the health of our populations. We emphasize

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<sup>1</sup> Preamble to the Constitution of the World Health Organization as adopted by the International Health Conference, New York, 19-22 June, 1946; signed on 22 July 1946 by the representatives of 61 States (Official Records of the World Health Organization, no. 2, p. 100) and entered into force on 7 April 1948.

that health outcomes are most strongly determined by the socio-economic determinants of health (50%) and access to health services (25%) and less so by biology (15%) and environmental factors (10%)<sup>2</sup>.

Accordingly, we ask that the CEAA review process extends beyond the consideration of environmental impacts, and therefore, that the review framework, including the Expert Panel ToR, is amended to facilitate the consideration of health and socio-economic impacts.

Our specific comments include the following:

We ask that it is ensured the Expert Panel (and Multi-interest Advisory Committee) includes adequate representation across the relevant health and social sectors. Further, we propose that the review is supported by other Ministers in addition to those listed in the ToR, such as (but not limited to) the following:

- Minister of Health
- Minister of Families, Children and Social Development
- Minister of Infrastructure and Communities
- Minister of Status of Women
- Minister of Public Safety and Emergency Preparedness

We recommend that the Multi-Interest Advisory Committee includes not only the proposed “*representatives of Indigenous organizations, industry associations and environmental groups*” but also those with knowledge and interest in health and socio-economic issues.

Further, we propose the following additions and amendments to the ToR “*Scope of Review*”:

- *How to improve the integration of health and socio-economic considerations into the EA scope to minimize adverse effects and ensure decision-making is based upon the best available evidence, serves the public’s interest and aligns with international best practice?*
- *How to ensure that environmental assessment legislation is amended to enhance the consultation, engagement and participatory capacity of potentially impacted communities in reviewing and monitoring major resource development projects?*
- *How to require project advocates to choose the best technologies and practices available to reduce environmental, health and socio-economic impacts?*

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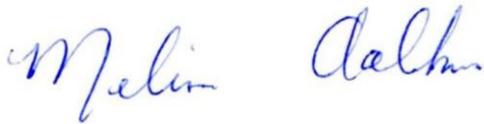
<sup>2</sup> Please refer to Northern Health’s *Standard Working Group Comments and Recommendations for Provincial Environmental Assessments*

Additionally, we ask that the review is informed by national and international best practices for natural resource management and health. Relevant guidance documents for your consideration include (but are not limited to) the following:

- Health Canada's Canadian Handbook on Health Impact Assessment;
- International Finance Corporation's (IFC) Performance Standards on Environmental and Social Responsibility
- National Collaborating Centre for Healthy Public Policy's Health Impact Assessment (HIA): Guides and Tools
- The International Association for Impact Assessment (IAIA) Best Practice Principles and Guidance Documents
- International Petroleum Industry Environmental Conservation Association (IPIECA) and International Association of Oil and Gas Producer's A Guide to Health Impact Assessments;
- International Council on Mining and Metals Good Practice Guidance on Health Impact Assessment

Northern Health looks forward to working in continued collaboration with you to serve our people impacted by industrial projects. If you have any questions, concerns or need additional clarity, please contact the Office of Health and Resource Development.

Sincerely,



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Northern Health