

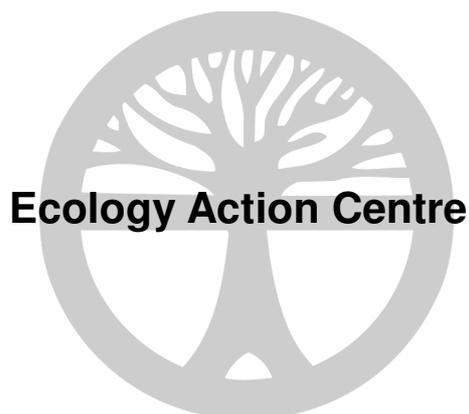
**Final Arguments for Nova Scotia Environmental
Assessment Board**

**Keltic Petrochemicals Inc. Proposed LNG and
Petrochemical Plant Facility – Goldboro, Nova Scotia**

To

**Nova Scotia Environmental Assessment Board,
Mr. James Gordon**

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Introduction

“Above all, it (Nova Scotia’s Green Plan) recognizes that protecting and sustaining our environment is essential to our health, our economy, and our collective well-being. Managing the environment is a collective effort. The government may lead but all Nova Scotians must be full partners with us in a shared commitment to responsible stewardship. I invite you to share our vision for how that commitment can be turned into responsible actions for the future.”

(Nova Scotia 2003 Green Plan, Minister’s Message)

The Ecology Action Centre (EAC) has reviewed the impacts of the proposed Keltic Petrochemicals Inc. plant on the natural and social environment of Nova Scotia with reference to EAC’s mandate which is *to promote a society in Nova Scotia which both protects and respects nature and also provides economically sustainable solutions for its citizens*. The EAC invites the Environmental Assessment Board (EAB) to reject the proponent’s undertaking as it conflicts with provincial and national efforts towards effective sustainable development, and its assessment does not prove its “no significant residual effects” conclusion.

The Ecology Action Centre believes the EAB needs to consider whether or not this project is in line with the vision Nova Scotians have for the future of the province. As well, considering the long-term, non-reversible effects the project will have on the environment, it is important that the EAB make a clear decision as to the sustainability and feasibility of this project. The EAB already knows from the public review of the EIA that numerous health impacts and environmental impacts are not accurately assessed given the wide array of impacts this project will have on Nova Scotia.

After attending the public hearings and listening to most of the information presented to the panel, the EAC would like to submit these final arguments and comments to assist the EAB in making its recommendations to the Minister.

Main points

Rural reality

The EAB as heard many municipal and county statistics and numbers regarding unemployment and the need for economic development in this region of the province. The EAC supports the need for economic development in this region; however, a few points still need to be made clear.

- Most if not all rural areas in Canada and Nova Scotia are experiencing a rapid out-migration and a decrease in population.
- Those areas with less population decline and unemployment have a stronger third sector based economy (service industry). This sector is underrepresented in Guysborough County.
- Death rates are higher than birth rates due to an aging population and the social changes which have occurred in the last 30 years regarding number of children per family and age at which individuals begin families.
- Nova Scotia, including Gusborough County, has a large women to men population ratio, yet economic development strategies locally, provincially and nationally, still focus on creation of

employment in fields where women have traditionally been underrepresented (by choice or by design), and which do not answer the current fields of choice and education level of women.

- Until the rural exodus trend reverses through sustainable development and community capacity building, the current governments should support economic development which meets the needs of the aging population of Nova Scotia and Canada, and help integrate these developments within a wider range of local and provincial community building initiatives.

- The rural exodus trend will reverse itself in part because of urbanites and emigrants seeking rural areas for cleaner, healthier and more peaceful culture and environment. Currently there is a market of Canadians and foreigners who wish to settle in our rural areas. In the nearby future, as Earth's natural resources and unpolluted areas become scarce, those both wealthy and not so wealthy, will chose to move away from congested polluted areas. The governments will need to build communities to accommodate this change and capitalise on it rather than having to deal with cleaning up brown sites to make them attractive to this burgeoning market.

- Tomorrow's youth¹ are not the same as yesterday's youth. Given the rapid technological changes of our times, and that most youth go on to post-secondary education, the future sustainability of our rural areas depends in part on attracting the professional youth. These will be more likely attracted to an environment that combines their needs for technological luxury and their awareness of the importance of healthy environments.

The EAB has heard many presentations during the hearings focusing on bringing back those who have left and how the Keltic project will do this. People who will come back will be those of the current generation in trades, and the project will cease to operate before they even reach advanced old age. If the province wants to address the numerous economic and related problems expressed to the board, it needs to approve projects that will attract and meet the needs of the retiring generations, the educated and technologically dependent youth, and the highly aware and environmentally conscious Canadian and International professionals. The undertaking proposed in this project does not meet these, and is counter to the notion of environmentally sustainable rural development.

Wetlands, Water and Meadow Lake

“...promote pollution prevention approaches with all stakeholders:

- promote stewardship approaches to protecting wetlands and other wildlife habitats”*

(NS 2003 Green Plan, p.10)

The EAC has clearly emphasised the role of wetlands and coastal habitats in vital ecosystem functions. We would like the EAB to be strongly critical of the fact that this project is directly negatively impacting multiple and varied wetlands, wet areas, and coastal habitats. The proponent has yet to develop or even explain where and how it will recreate these areas, and whether these will be able to play the same role in providing healthy and varied ecosystems which are essential to a variety of species in the area. The proponent's development approach seems in complete opposition to efforts provincially and nationally for wetlands conservation, especially the marginal wharf and the damming of Meadow Lake, which we have mentioned in our presentations. The EAB should consider how the proponents planned project design and mitigation measures conflict with the provincial wetlands designation policy.

¹ Youth in this document refers to those twenty years old and younger.

The EAB should remember that the EIA was strongly criticized for its disregard of the role Meadow Lake and Isaac's Harbour River and harbour play in the life of the Atlantic Salmon population. The lack of assessment and off hand dismissal of the project's impacts on this species, as well as other land and water species, was deemed unacceptable by government departments which reviewed the EIA and submitted their comments to the EAB, such as Department of Fisheries and Oceans. The EAB should remember that the proponents chosen VECs and its assessment of these and other environmental concerns have been questioned and found incomplete. The EAC believes that the EAB should keep in mind the fact that ecosystems are all interlinked from near and far, and that the local, regional and national efforts to ensure the survival of the Atlantic Salmon, as well as other marine species, will be directly and/or indirectly impacted by any disruption, alteration or destruction of the related ecosystems which may play a role in the species overall long-term health.

The EAB should also remember that the land around Meadow Lake which will receive the intake structures still has not be re-zone industrial, and that further details on the impacts of the dam are still needed. Given the hydrological changes expected in the Atlantic region with climate changes, such as heavier precipitation and longer drought periods, the EAB should consider how the Keltic project's use of freshwater in the area will affect the long-term supply and quality of water for all ecosystems, not solely human consumption, and whether this is in line with current and future water management initiatives in the province.

Air emissions

"National and International Air Quality Initiatives,

The provincial government is an active participant in a number of national and international air quality initiatives. These initiatives have set priorities and time-bound objectives.

Implementation plans are in progress. Some examples include Canada-wide standard on ground-level ozone (65 parts per billion by 2010) and particulate matter (PM_{2.5} 30 µg/m³) •

Canada-wide Acid Rain Strategy for Post 2000 • New England Governors and Eastern Canadian Premiers Acid Rain Action Plan, Mercury Action Plan, and Climate Change Action Plan • Canada – US Border Initiative on trans-boundary air quality issues • Canadian Air Quality Index improvement" (NS 2003 Green Plan, p 12.)

The EAB should emphasise in its report the province's current and future obligations in improving the air quality in the province and reducing our contribution to air pollutants. Many residents have written to the EAB regarding their concerns about air quality, health and enjoyment of property. The EAC emphasises again to the EAB the cumulative impacts and the instigator role the Keltic project may play in increasing the overall air pollution in the area during its 35 year life span. This is an important environmental and human health concern which requires a strong stance by the EAB and the Minister, if Nova Scotia is to meet its provincial, national and international air quality obligations.

Energy and Climate Change

"Energy and the Environment Nova Scotia's Energy Strategy, Seizing the Opportunity (2001), reflects the importance of the environment in all government planning in one of its three main goals:

"to improve the province's environment and enhance the quality of life of Nova Scotians." The strategy establishes specific targets including • reduce sulphur dioxide (SO₂) emissions 25 per cent below the current cap by 2005 and 50 per cent in total emissions by 2010 • reduce nitrogen oxide (NO_x) emissions 20 per cent below 2000 levels by 2009 • reduce mercury

(Hg) emissions 30 per cent by 2005 • implement national standards for particulate matter when they come into effect” (NS 2003 Green Plan, p.13)

The EAB is aware that the Keltic project does not fit with the above provincial goals. It has been made clear both in the review of the EIA and at the hearings that most of the natural gas will be piped to the United States, while the site’s emissions, including Green House Gas emissions totalling 3% or more of the province’s total annual output, will be produced in Goldboro. The proponent’s undertaking directly contributes to the province’s overall contribution to the climate change crisis, smog and acid rain.

Though there is a market for natural gas in Nova Scotia, and business developers are hopeful that this project will help increase the availability of gas in the province, the main power provider, Nova Scotia Power Inc., still has not changed its policies to convert its systems to natural gas. As well, the proponent is not situating its facility next to existing industries which could switch to natural gas; has made no commitment to providing natural gas at a preferential rate to the local residents who will experience all the environmental, health and social impacts; and did not include the total contribution of air pollutants of the whole project from gas extraction, liquefaction, shipping, revaporization and piping in its assessment of providing a “cleaner fuel” to the USA. In effect the project will simply increase the total consumption of fossil fuel, dirty and clean, in North America; claims to the contrary remain unproven.

As quoted from the provincial Green Plan 2003:

“The Province of Nova Scotia is committed to improving Nova Scotia’s air quality. We will

- reduce emissions of sulphur dioxide, nitrogen oxide, and mercury through regulatory programs according to established targets and time frames*

- participate in national and international initiatives that address trans-boundary air issues*

- work to meet national standards for two primary components of smog: ground level ozone and particulate matter...” (NS 2003 Green Plan, p.13). It is clear that the province has made commitments to reducing our provincial contribution of air pollutants. As well, as part of the New England Governors and Eastern Canadian Premiers Climate Change Action Plan, the province has committed to reduce our green house gas emissions:*

“Short-term Goal: Reduce regional GHG emissions to 1990 emissions by 2010.

Mid-term Goal: Reduce regional GHG emissions by at least 10% below 1990 emissions by 2020, and establish an iterative five-year process, commencing in 2005, to adjust the goals if necessary and set future emissions reduction goals.

Long-term Goal: Reduce regional GHG emissions sufficiently to eliminate any dangerous threat to the climate; current science suggests this will require reductions of 75–85% below current levels.” (New England Governors and Eastern Canadian Premiers, p.7). The proponent’s project as it is proposed does not help the province meet these obligations.

The EAB should give a strong message that the province should facilitate and support renewable energy and low air pollutants endeavours, and their manufacturing in the province, rather than approve highly polluting non-renewable energy facilities which are actually increasing our air pollutants and delaying the province’s efforts in meeting its commitments. The project goes against Canada’s commitment to the Kyoto Protocol, and other players to reduce our air pollutants and GHG emissions. On these points alone, the EAB should reject the undertaking.

Principles and Philosophies

“In addition to providing societal benefits, the natural environment has significant intrinsic value. Landscapes must be managed to ensure that nature and biodiversity are adequately maintained and that all values are considered. All species must have access to habitats that support healthy populations. Recognizing that biodiversity reaches beyond human requirements for a healthy environment, many government programs promote awareness of the intrinsic value of the environment.” (NS 2003 Green Plan, p.4)

The EAB should reflect on where Nova Scotia has been and where it is going in terms of environmental stewardship. The province has expressed support of the precautionary principle, product stewardship, solid waste diversion, polluter pays, and many other environmental and economic strategies (See Environment Act, Part 1, at Appendix A). The proponent has yet to demonstrate a commitment to environmental and product stewardship, and waste reduction or diversion. The current provincial government’s strong political support of this project (as expressed through the media) has shown the public a provincial lack of commitment to follow its own environmental principles. The EAB must ensure that its recommendations bring with it high expectations of provincial commitment to its policies and the underlying purpose of its Environment Act 1994-95.

The EAB should ponder the corporate philosophy of the proponent and its relation to the implementation of the various management plans and mitigation measures brought forth in the EIA and hearings. The inconsistent level of attention to detail and information provided by the proponent in its EIA does not indicate a corporate philosophy of taking the time to do things right the first time, and adherence to best practices. With no previous projects in Nova Scotia or Canada and with foreign owners and/or managers, the proponent has no local best management and environmental and social corporate responsibility precedence on which the EAB and public can base their confidence of the proposed mitigation measures, and the proponent’s long-term commitment to the well being of the community. The EAB should consider the reality of commitment and compliance with best management practices in this industry and the capacity of enforcement of non compliance in the province.

In today’s Canadian culture, with high awareness and education among the population, and a very wary public in regards to government regulations standards, and enforcement, the proponent needs to demonstrate that it will take on itself to exceed regulatory requirements. The hearings and the EIA did not elucidate such a commitment. The public has lost much of its trust in government, and new industrial facility and corporate efforts need to surpass the level of health and environmental protection requested by the province. This corporate philosophy and commitment must be demonstrated. The EAC feels that the proponent has not demonstrated a commitment to exceeding provincial health and environmental regulations standards.

The EAB should consider that, as the hearings clearly indicated, the proponent’s report was found lacking in many details with impacts information and data often unclear and inconsistent. The proponent has not been able to support its “no significant residual effects” conclusion other than by relying strongly on its yet to be developed environmental management plans, habitat compensation plans and reliance on meeting regulatory

requirements. Comments from individuals, organisations and government departments have indicated, outlined or emphasised these points, and this pattern shows an underlying notion that this project is not only a health and safety concern for citizens and governments, but also by its very nature a heavy environmental polluter regardless of mitigation measures. Clearly the EAB should reject any undertaking which in all aspects of its being is contradictory to sustainable development, environmental stewardship and pollution prevention.

Waste

The province of Nova Scotia is known for many things across the country, but as a political power to admire there is one marked achievement: the solid waste management program. Nova Scotia became a Canadian and a world leader on the recycling of its waste. This showed the country and the world that with good and visionary leadership it is possible to implement programs that help actually address some of our problems.

The EAB must ponder what type of message the province would be sending to its citizens and the world if it accepted the production of raw plastics, some of which are not recyclable here, from an imported source of gas. The message would be contradictory to its leadership role in waste diversion and reduction. If most plastics are still not recycled, as is currently the case all over the world, then the project would be adding to the landfill problems of the province and the world, and increasing the cost of solid waste programs. The EAB should recommend that the province focuses on encouraging the other segments of the 3 R (reduce and reuse) thereby reducing its cost and keeping its leadership role, and consistency between policies. The province would be going against all its investment in money and time in getting Nova Scotians to buy more recycled products and be better stewards of the Earth, if it approved this project.

Health

“Exposure to pollutants through the contamination of air, water, and soil has been linked to various health conditions such as cancer, cardiac and respiratory illness, reproductive problems and birth defects, nervous system disorders, allergic reactions, hypersensitivity, and decreased resistance to disease. In April 2002, the Physical Environment Committee of the Provincial Health Council released a report that recognizes the connections between the physical environment and human health.” (NS 2003 Green Plan, p.12)

The EAB must take into account the role this project plays in the current state of health in North America and its ever increasing levels of cancer and respiratory illnesses which are known to be linked in part to environmental degradation and the production and consumption of chemicals, pesticides and other products derived from hydrocarbons. Neither the proponent nor any speakers at the hearings have adequately addressed the issue of human and environmental health related to the petrochemical industry. Health Canada review of the EIA did find much information on this point missing. Though these details should become available through the industry permitting processes, the EAB must be conscious of the reality that this project is not improving our environment or our health but increasing our exposure to chemicals in the direct environment surrounding the site, for the workers at the site, and in our homes, work and recreational places where the end products are used. As well, the proposed project creates both hazardous and non hazardous waste, which increases our waste disposal problems locally, regionally and internationally, and exposes more of our environment to pollution.

The EAB must ponder the overall health impacts this project will have on all peoples, and make its decision in clear conscious of the costs (emotional, physical, mental, environmental, social and financial) the ever decreasing health of our populations, and the planet's, will have on current and future generations. This cost should be included in the overall benefits versus costs analysis of this project, and should lead the EAB to reject the undertaking.

Culture

Regarding the proponents undertaking number 2 to the Board, it is noted that the meeting (seems like there was only one) in Lincolnville was in July 2004. This was prior to the rezoning of the area by the Municipality and to more detailed site design data by the proponent. It is unlikely that at such an early stage in the process that many people in Lincolnville would have attended the open house. The Keltic Petrochemicals Inc website does not indicate any further meetings with Lincolnville residents. The EAB should look closely at the proponent's public consultation efforts and what problems may occur in the future if the proponent continues its current standard of public consultation.

The EAB should strongly consider the impacts locating this project in Goldboro will have on the shared history of three cultural groups. The EAB has heard from the Black Loyalist descendants in Lincolnville and from the Mi'kmaq Chiefs about their concerns regarding proper approaches to cultural artefacts, but also the consultation processes used. Considering the province's mandate to enhance and preserve cultural sites, the construction of this area into heavy industry which prevents the access or utilisation of these sites has important implications for Nova Scotia's heritage. The EAB should not approve this project in part because of these considerations.

Location

The EAB must remember and consider that the area selected for the site has only been rezoned in 2005, that there was local opposition to the rezoning and that residents live within less than, or close to, half a kilometre from the site. The site is a largely undeveloped wet zone; is part of the sensitive coastal-land transition zone; and is adjacent to small rural coastal villages. The chosen location is not a favourable one for heavy industrialisation.

The chosen site is a very active natural area which, though apparently common to the region, plays an important part in keeping the area healthy and providing future sustainable development options. The EAC would like to remind the EAB that the proponent has not shown how the combination of all its components over a 35 year life span would affect the local species which might remain in the area after construction, including endangered species like the Roseate Tern. With the overall degradation of the local environment the Roseate Tern may simply move to another area through time, but that is uncertain and unproven. What will be the impact of contamination of the area's ecosystems on this endangered species? The EAB should consider whether we have the right of potentially disrupting the overall long-term ecosystems health of the whole region, and in the process putting such a large population segment of an endangered species at high risk.

The EAB has heard about the safety risk to the human population due to human error or terrorist act. The EAB should add to this knowledge the risk to non-human populations if

there are accidents both at the petrochemical facility and the LNG facility and its vessels. The EIA does not identify what would be the impact, nor has run scenarios, on the consequences such accidents would bring to the endangered Roseate Tern population, or other species in the area including those in the wilderness north-east of the site. The EAB should consider what this project would have not only on the species, but on Canada and Nova Scotia's obligation to its international, national and provincial commitments to the protection of endangered species and biodiversity agreements.

The chosen site, and the municipalities rezoning, might potentially bring long-term ecosystem degradation which would put short-term economic gains above long-term environmental health. The EAB must be aware that by choosing such an undeveloped site for its location, the proponent and the municipality will open up the back country of the Goldboro Industrial Park to development. The EAB must consider the long-term implication for the area's environment, its link to human and environmental health, and the combine impact and pollution all these industries, roads and human activities will have on the overall sustainability and health of the area, the province and the planet.

The EAB has heard about the concerns regarding the rerouting of the Marine Drive. As was illustrated at the hearings, this part of the project should have been an obvious component of the project even before the registry documents were submitted to the province. Yet not only was there no mention of the rerouting of the 316 until the EIA, the detailed design and assessed impacts of this specific road were minimal in the EIA; even the figures and matching text were incorrect according to what the proponent said at the hearings. The EAC believes that the lack of foresight and information regarding this part of the project is indicative of some lacks with the proponent's capability in identifying all of its impacts on the surrounding area. The EAB should take a close look at the EIA and determine the level of reliability, accuracy and detailed knowledge present in the report, and whether or not the proponent has covered all aspects of its project.

The EAC emphasises that this project's location is taking away from better provincial economic benefits and adding more environmental impacts than necessary. The EAB should consider the availability and possibility of alternative industrially developed ports, even if the proponent hasn't clearly explained its rejection of those alternative sites. The EAB should reject this project because it is the wrong type of human economic and social development to take place in this area.

Sustainable Development

"A Sustainable Community is "a community that maintains, enhances, or improves its environmental, social, cultural, and economic resources in ways that support current and future community members in their pursuit of healthy, productive, and happy lives."

*(Taken from the working definition of the Nova Scotia Government's
Provincial Community Development Policy Initiative)"*

(NS 2003 Green Plan, p.7)

The EAB and the Minister must realise that this project is potentially precedence setting. Acceptance of this Keltic project could lead Nova Scotia down a road that is contrary to most other Maritime and Canadian provinces' awareness of the desires of 21st century Canadians. It is known in Canada what problems are linked to this type of development locally, regionally, nationally and internationally. Within the province's borders this project will increase green

house gas emissions; air, water and soil pollution; exposure to dangerous products and chemicals; production of waste (hazardous and non hazardous); fragmentation of wildlife habitat; destruction, disturbance and alteration of fish habitat; disruption of coastal functions; and contribute to heavy polluting industrial expansion within undeveloped land. Outside the province's borders the list of environmental, social and economic negative impacts is even longer.

These and the philosophy behind the project in turn contribute to health and environmental degradation; the encouragement of a throw away culture which is causing immense costs to governments, and logistic problems, as well as negatively impacting both human and environmental health; the support of a temporary energy solution rather than the support of long term economically feasible and environmentally friendly energy sources; the continued concentration of wealth and power in the hands of a few groups, rather than a decentralised more equalised distribution of wealth; the support of highly polluting industries by multinational corporations whose responsibility for the economic, health, environmental and social consequences of their operations is difficult to ascertain; and the contribution to more climate change causing gases which are putting our immediate future, and our descendents, at risk of losing the basic essentials of life. The support of this project by Nova Scotia would make us part of the global problems rather than us being part of the global solutions.

The EAB and the Minister need to look at where this project will put Nova Scotia in 35 years and the creation of what world is it encouraging. Then look at where we would be and what we could achieve during those same years if the province follows its commitment to sustainable development. Multiple examples were brought forth to the EAB during the hearings about sustainable development options. These included a variety of initiatives and economic opportunities that would require the collaboration and commitment of the province, the counties and its people, as well as assistance from the federal government, if need be. This is a slower, harder and more demanding path for the province than accepting the Keltic project; however, it is the path to which the province has committed itself in its Green Plan. The EAB and the Minister must acknowledge that right now is an opportune time to take that leadership step in building strong communities and profit from our natural capital rather than destroying it.

The EAB must realise that sustainable management of renewable resources permits our species, among others, to have food, air, water and material to protect us from the elements. Polluting industries like the proposed Keltic project contributes to the degradation of these resources on a local and global scale. There may be a demand for plastics and fossil fuel energy because we've created them, but these can be diverted, reduced or eliminated as the solid waste program has proven. The EAB should remember that this attempt at economic growth is adding to the plethora of industries around the world which are putting all species at risk of losing their populations. Sustainable development options would permit the loss of less population and bring forth the economic growth needed.

Approving this project could very well mean opening this undeveloped area to heavy industry and in the process creating more long-term logistic problems for the province in having to protect Nova Scotian from the impacts of the facilities. It will also mean that in less than 20 years, governments, environmental organisations, Mi'kmaq, African Nova Scotian, and all other regional players will be forced into a relationship of rivalry involving disagreements, years of research, studies, reports, advocacy, soliciting, and government infighting, in order to face the policy nightmare of having opened undeveloped land for unsustainable short-term

heavily polluting industry; and this despite the awareness in Nova Scotia and Canada that this type of development increases the burden of the future rather than relieve both today and tomorrow's burdens.

Sustainable development means "... *development that meets the needs of the present without compromising the ability of future generations to meet their own needs.*" (NS 2003 Green Plan, p. 30) The EAB must be able to justify in its report where it stands on the points made above, but also on points made by the EAC at the hearings regarding the role this project plays in impacting future generations through its construction and operation which compromises the essentials for healthy lives. As the EAC stated, without clean air and clean water, precise temperature equilibrium and adequate food sources there is no life on Earth. This project does not provide, enhance or protect any of these, but rather compromises their integrity, quality and availability in exchange of jobs for one generation, and polluted air, water, soil, dangerous climatic conditions and decreased health for multiple generations. The EAB should recommend the Minister take a strong stance on committing the province to sustainable development options, and preserving the few areas left in this province which permits the continuation of healthy ecosystems. The EAB should reject this undertaking as it does not "*meet the needs of the present without compromising the ability of future generations to meet their own needs*" (Ibid.).

Recommended Alternatives

Though the EAC strongly encourages the EAB to reject this undertaking, below are some conditions the EAB should recommend if it chooses to approve the undertaking.

- The project should be developed in an alternate location that is currently industrially developed, is more easily accessible, closer to the workforce, and where less healthy ecosystems and endangered species would be directly or indirectly affected by the project.
- The proponent should commit to total transparency of its emissions, effluents, resource consumption, and other such health, environmental and social concerns through out its life.
- The proponent should be an active participant (or funding resource) in the region's water management strategy and source water protection plans, to ensure its operation and consumption of water stays within environmentally and socially responsible limits.
- The province and the proponent should ensure a more all inclusive and informative public consultation process.
- The proponent should be obliged to help build a cultural heritage facility of a quality which would attract heritage tourist and academics to the area, as well as employ local descendants of those whose history is being built on, around or near.
- The proponent should step up its impacts assessments and its analysis of its mitigation capacity, taking more time to get all the details and assess all component with due diligence.
- The province should only accept the most accurate industry permit requirements from such a highly polluting industry, and put in place a 35 year monitoring and enforcement schedule of the site.
- The province should require a thorough health risk assessment of the project, both individual components and their combined effect, over both short-term and long-term exposure.
- The proponent must develop a full range of habitat and financial compensation plans which should be made public and open to discussion.

- The proponent should provide the province with means to ensure the decommissioning and rehabilitation of the site in the case the proponent lacks the financial means to do so at the time of decommissioning.
- The province and municipality should make any concessions or tax benefits to the proponents publicly known and open for review by an independent panel.

The EAC reiterates here its initial recommendations in our review of the EIA and invite the EAB to consider them appropriate alternatives to this project in its report to the Minister.

A) We recommend that the proposed Keltic Petrochemicals Inc. LNG and Petrochemical complex not be approved by the province and the federal governments. Instead we suggest that:

- *The province should take a proactive strategic environmental assessment approach to development, and move away from the current reactive environmental assessment approach.*
- *The province should follow the intent of its Energy Strategy and seek to develop aggressively its renewable energy resources and reduce consumption, rather than develop a reliance on imported energy sources.*
- *The province should accelerate the development of a coastal strategy to achieve integrated sustainable development of Nova Scotia's coast.*
- *The provincial, federal and municipal governments and financial institutions should work with local residents to focus efforts on community based sustainable economic development that are tied to the history, culture, knowledge and natural local resources of the area.*
- *The Dung's Cove - Red Head Point site should be developed into a Heritage site and be part of an overall heritage resurrection plan for developing the area's history to attract tourism, researchers, and create jobs for the descendants of those who created those communities.*
- *The province should invest more infrastructure funds into making Guysborough County's coast more easily accessible to encourage tourism, local travel and business opportunities.*
- *The province should formally protect the publicly-owned road less wilderness areas near Goldboro using the Wilderness Areas Protection Act, to encourage sustainable development and promote nature-based tourism along the Eastern Shore. (EAC, 2006)*
- The province should consider cumulative impacts on coasts and opt for integrated and meaningful province wide coastal planning policy if our coastal environments and communities are to be sustainable and grow.
- The province should facilitate and lead its economic development into sustainable alternatives.

Conclusion

“...protecting and sustaining our environment is essential to our health, our economy, and our collective well-being.” (NS 2003 Green Plan, p.2)

Environmental sustainability and pollution prevention is a fundamental part of economic prosperity. However, the Keltic project is neither environmentally sustainable, nor preventing pollution, and the role it will play in the province's economic prosperity has yet to be proven given the long-term environmental and health costs associated with the project which will be the social and financial burden of all Nova Scotians, today and tomorrow.

The EAC reiterates its initial reasons for rejecting the project during the review of the EIA:

- the short-and long-term adverse impacts to the immediate area and the province are not balanced out by the limited benefits that will remain within the province.*
- the project will have negative impacts on the environment and human health in the short and long term, thereby increasing Nova Scotia's long-term social and environmental burdens.*
- the project will not help Nova Scotia meet its energy goals but add to its vulnerability to international energy market pressures.*
- the project's nature, scale and industrial requirements do not fit into the nature, size and provisions of the Country Harbour area in light of the lack of industrial history, infrastructure and development in, or near, the proposed site. (EAC, 2006)*

The Ecology Action Centre does not support this project, because in the small and big picture, in the short and long term, it is part of the addition of problems in this country and around the world, and not a subtraction of these problems. If the EAB and the Minister approve this project the province will be creating a problem which we will all have to deal with later, instead of actually solving our current problems by actively building sustainable communities.

The EAB must take into consideration that environmental and health effects will outlast the facility, and that contribution to climate changes will be increased throughout the life of this project. This project does not fit with the goals and efforts of this province and its people in addressing the needs of our generation and future generations. The responsibility is ours to take now, not to pass on to our children in the future. The province has shown leadership in the past in regards to improving environmental and economic well being. The EAB should recommend it does the same in its decision for this project.

The EAC would like the EAB to conclude, as we have, that this project is not sustainable; does not meet Nova Scotia's energy needs; conflicts with Nova Scotia's environmental policies and commitments; is improperly situated in Goldboro; and its long-term costs outweigh its short-term benefits. In short the EAB should recommend to the Minister that this undertaking be rejected.

Appendix A

Nova Scotia Environment Act 1994-95

***An Act to Reform the
Environmental Laws of the Province
and to Encourage and Promote
the Protection, Enhancement and
Prudent Use of the Environment***

Short title

1 This Act may be cited as the Environment Act. *1994-95, c. 1, s. 1.*

PART I

INTRODUCTION

Purpose of Act

2 The purpose of this Act is to support and promote the protection, enhancement and prudent use of the environment while recognizing the following goals:

- (a) maintaining environmental protection as essential to the integrity of ecosystems, human health and the socio-economic well-being of society;
- (b) maintaining the principles of sustainable development, including
 - (i) the principle of ecological value, ensuring the maintenance and restoration of essential ecological processes and the preservation and prevention of loss of biological diversity,
 - (ii) the precautionary principle will be used in decision-making so that where there are threats of serious or irreversible damage, the lack of full scientific certainty shall not be used as a reason for postponing measures to prevent environmental degradation,
 - (iii) the principle of pollution prevention and waste reduction as the foundation for long-term environmental protection, including
 - (A) the conservation and efficient use of resources,
 - (B) the promotion of the development and use of sustainable, scientific and technological innovations and management systems, and
 - (C) the importance of reducing, reusing, recycling and recovering the products of our society,

- (iv) the principle of shared responsibility of all Nova Scotians to sustain the environment and the economy, both locally and globally, through individual and government actions,
 - (v) the stewardship principle, which recognizes the responsibility of a producer for a product from the point of manufacturing to the point of final disposal,
 - (vi) the linkage between economic and environmental issues, recognizing that long-term economic prosperity depends upon sound environmental management and that effective environmental protection depends on a strong economy, and
 - (vii) the comprehensive integration of sustainable development principles in public policy making in the Province;
- (c) the polluter-pay principle confirming the responsibility of anyone who creates an adverse effect on the environment to take remedial action and pay for the costs of that action;
- (d) taking remedial action and providing for rehabilitation to restore an adversely affected area to a beneficial use;
- (e) Government having a catalyst role in the areas of environmental education, environmental emergencies, environmental research and the development of policies, standards, objectives and guidelines and other measures to protect the environment;
- (f) encouraging the development and use of environmental technologies, innovations and industries;
- (g) the Province being responsible for working co-operatively and building partnerships with other provinces, the Government of Canada, other governments and other persons respecting transboundary matters and the co-ordination of legislative and regulatory initiatives;
- (h) providing access to information and facilitating effective public participation in the formulation of decisions affecting the environment, including opportunities to participate in the review of legislation, regulations and policies and the provision of access to information affecting the environment;
- (i) providing a responsive, effective, fair, timely and efficient administrative and regulatory system, recognizing that wherever practical, it is essential to promote the purpose of this Act primarily through non-regulatory means such as co-operation, communication, education, incentives and partnerships, instead of punitive measures. *1994-95, c. 1, s. 2.*

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