

Public hearings
November 20th 2006
Keltic Petrochemicals Inc.



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Ecology Action Centre

Ecology Action Centre

- Nova Scotia's oldest non-profit environmental organisation
- Mission is to help create a healthy and sustainable Nova Scotia
- We received funding from the Canadian Environmental Assessment Agency to participate in the environmental processes for this project.

Impacted Acreage

- The EIA states that the “*Zoning has been amended to an M-3 designation that targets the marine aspect of the Keltic development. This designation encompasses an area between 2833 and 3238 ha, of which approximately 300 has been allocated to Keltic. (8-1)*”

Impacted Acreage

EIA Section	Definition	Acreages	Clarification
ES 1	Require approximately	300 ha	Processing facility, zone industrial
2-50	Overall site preparation	240ha	Assume within GIP
8-70	Larger proportion of site	353ha	Northeast of highway 316
8-75	Keltic site approximately	390 ha	Includes LNG terminal
15-1	In total will require approximately	300ha	Includes LNG, Petrochemical, Cogeneration
9-22	Will cover approximately	350ha	Of land
9-88	A loss of up to	380 ha	Habitat removal on plant site
9-89	Removal of prey habitat, potentially up to	400 ha	Both side of 316 highway
2-39	New 316 highway	12km	(72 ha for new road)
2-40	Right-of-way along new route	50m	
Table 9.8-4	Geographic extent of impacts	350 ha	
9-127	Archaeological study	324 ha	

Dam Impacted Acreage

- *“The impoundment of Meadow Lake will flood approximately 295 ha of habitat... »
(2-151)*
- *“The impoundment of Meadow Lake will flood approximately 140 ha of habitat,.. »
(10-21)*

Acreage - Questions

- What is the total acreage of land being affected by the dam? What does this include (flooding, habitat removal, archaeological sites, roads, pipes, construction, etc.)?
- What is the total acreage of land and water surface being affected by all components of the project?
- These must include the extent in case of dam failure, petrochemical plant and LNG accident, not only actual use of land.

Employment Inconsistency

Construction Employment in the EIA

EIA Section	Definition	Numbers
2-35	Peak at approximately	3000
Table 2.4-1	Total employment	4772
Figure 2.4-4	Peak of required employees	4000
2-55	Should peak in the area of	4700
9-50, 9-197	Will total about	4775

Employment Inconsistency

- *“Construction of the Keltic Site is projected to last three years and will involve about 1400 workers working six days per week for 48 weeks per year. If it is assumed that all of these workers travelled from, and returned to, the Antigonish area each day with 2.5 workers per vehicle, there will be an additional 1,120 two-way vehicle trips per work day on the existing access route using Trunk 7, Route 276 and Route 316.”* (9-134, calculation for vehicle traffic impacts)
- *“...the facility is expected to employ up to 3000 people. Approximately 60% of the workforce is expected to be housed in temporary construction quarters at the facility.”* (9-140 health impacts)

Employment Inconsistency

Operation Employment in the EIA

EIA Section	Definition	Numbers	Clarity
9-8, 9-50, 9-197	Total employment at full operation	624	
9-135	Approximate employees at the plants	500	Transportation impacts
4-9	Estimated workforce	600	Water consumption
9-8	Day shift on-site	<i>210</i>	Adds up to 350 employees (4 shifts)
9-8	Night shift on-site	<i>140</i>	
9-9	Current residents	155	Guysborough County
9-9	New residents	95	
9-9	Current Residents	280	Antigonish & beyond
9-9	New residents	94	
2-71	LNG up to	<i>110</i>	Adds up to 450 employees
2-71	Cogeneration in the area of	<i>50</i>	
2-71	Petrochemical neighbourhood of	<i>290</i>	
9-140	Employ approximately	600	Health impacts

Employment Inconsistency

- *“During the operation of the LNG and petrochemical plants, it has been estimated that there will be approximately 500 employees at the plants. If 25% of the workers are assumed to live near the plants, and 75% live near Antigonish, there would be about 500 two-way trips per work day on access routes between Antigonish and the plants if operation workers travelled with 1.5 persons per vehicle.” (9-135)*

Clarity Needed

- Creates an unclear picture of the impacts of the project
- Gives impression report was rushed
- Reflects lack of communication between the various authors of each section
- Creates doubt as to the accuracy of the analysis

Conclusion

- The acreage and employment numbers must be accurate and used consistently in the assessment of the impacts.
- The proponent must demonstrate that these numbers are based on sound analysis and use of the most cautious numbers for assessing the impacts.
- The public must be informed of the re-assessed numbers and their related impacts and mitigation measures.