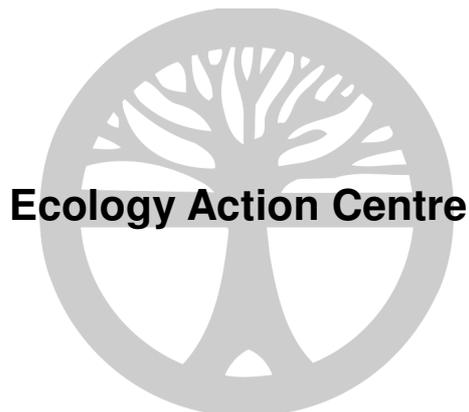


**Written submission A for Nova Scotia Environmental  
Assessment Board Public Hearings on the Keltic  
Petrochemicals Inc. Proposed LNG and Petrochemical  
Plant Facility – Goldboro, Nova Scotia**

**To**

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

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## Introduction

The Ecology Action Centre 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*. We ask whether this project is sustainable, whether it meets the needs of the local population and contributes to the long-term energy security of Nova Scotians.

The environmental impacts assessment (EIA) report was inconsistent and made it difficult to assess the impacts of the project, especially concerning employment numbers and total acreages, both land and water, of impacts. A reader is left with an unclear picture of the negative impacts or the benefits of the project. Below are some of our concerns and questions which require clarification from the proponent, as well as points the panel should seriously consider in their report. In our presentations we will be seeking clarification, confirmations and commitments from the proponent to some of these points and questions.

In the EIA it is indicated that people were supportive of the project despite lacking important information and details. *“Overall sentiment at this open house was supportive of the Project. However, people stated that they were getting tired of hearing the same things in meetings, and still not knowing how firm the prospects for development and employment opportunities were.”* (14-7) The EAC wants to ensure that the proponent will bring clarification to the local people during the public hearings. Realising that the government authorities have already pointed out to the Panel the many lacking impacts and environmental assessments in the EIA, we will focus our presentations and written submissions on other points needing clarification, though there may be some overlap with government comments.

## Project Need

According to the Municipality of the District of Guysborough amendments to the municipal planning strategy, the reasons for encouraging industrial development are:

- 20%+ unemployment rate in the Municipality
- 13.1% decline in population in municipality in 5 year period
- Significant loss of jobs in fishing, forestry and related industries within Municipality
- One of the lowest per person average income in the Province at 32% below provincial average
- Citizen Surveys by Municipality and RDA indicated that job creation was one of the most important issues for local leaders
- Reduced dependence on residential tax rate for municipal services
- Diversify economy within our Municipality and Region
- Out migration of youth and young professionals to urban areas (page 4).

Yet looking closely at the EIA one comes to the conclusion that this project will not address most of the municipalities reasons for rezoning well over 2000 hectares of wilderness north-east of the Goldboro Industrial Park (GIP) towards Ocean Lake, and the coastal lands in front of the GIP. This rezoning will substantially change the area's residential nature and effect the area's environment, human health, social and cultural identities, and use of land.

Cumulative impacts are not properly covered by the proponent in the EIA, a fact the Panel must take into consideration given the expected expansion. In the same line, the EAC requires clarification from Keltic as to how much land and surface water acreages the site will actually affect, and hopefully this will provide the Panel and the public with a better understanding of the impacts.

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. The area includes the shoreline of Red Head to Betty’s Cove, including the existing pipeline and Nova Scotia Power Inc. line corridors. The adjoining Sable gas complex has a footprint between 40.5 and 48.6 ha, of which 20.2 ha has been fenced.” (8-1) From this, one gathers that the Keltic site within the M-3 zoning is in the area of 300 ha, yet throughout the report the acreage seems to indicate that the total impacted acreage is more than that.

Here are quotes from the site which include various components of the project:

“The processing facilities in Goldboro will require approximately 300 hectares (ha) of land zoned for industrial use.” (ES-1)

“The 240 ha Goldboro Industrial Park is owned by the Municipality of the District of Guysborough (Municipality).” (2-7)

“The overall site preparation of 240 ha will be planned with a balanced cut and fill.” (2-50)

“The larger portion of the proposed site (estimated 353 ha) is northeast and uphill from Highway 316.” (8-70)

“Also, the Keltic site is not linear, rather it is a 390 ha (approx.) polygon with a peninsular (terminal area).” (8-75)

“Keltic proposes to construct and operate a Petrochemical and LNG Facility in Goldboro, Nova Scotia (the Project). The Project components, as described in Section 2.0, include a LNG regasification facility, a petrochemical complex, a marginal wharf, a marine LNG terminal, LNG storage and an electric co-generation facility; which, in total, will require approximately 300 hectares (ha) of land.” (15-1)

“The LNG terminal area is a peninsula (approx. 35 ha) and a strip (approx. 14 ha) southwest of Highway 316 from the base of the peninsula southeast to the site border (See Figure 8.8-1).” (8-69)

“The proposed development is described in Section 2. It will cover approximately 350 ha of land and will stretch over approximately 3.5 km, i.e. from approximately one km off the shore of Betty’s Cove, to approximately 2.5 km inland at the existing SOEP gas plant. Immediately alongside the waterfront at Betty’s Cove, the development will extend over approximately two km.” (9-22) (Is the marginal wharf included in the 3.5km? If so is the 1km from the shore of Betty’s Cove the most protruding point of the wharf?)

“Habitat removal will result effectively in a loss of up to approximately 380 ha of vegetation and associated wildlife habitat on the plant site.” (9-88)

“Much of the approximately 47 ha of the terminal area and adjacent coastal strip will be similarly affected.” (9-88)

“The main impact on raptors would be removal of prey habitat on both sides of Highway 316, potentially up to 400 ha. The site also includes a small portion of short-eared owl habitat (short-eared owl is a COSEWIC species of special concern). Up to 400 ha of woodland and woodland edge bird habitat may be removed.” (9-89)

“The proposed new construction of Highway 316 is 12 km long.” (2-39)

“The right-of-way (RoW) will have to be approximately 50 m wide to accommodate the 2-lane highway.” (2-40)

For the impacts of the planned commuter route the EIA says “Using the total route length of 76.7 km” (9-135). Given the use of the whole route from Antigonish to Goldboro to determine safety impacts, why are environmental and social impacts not assessed along the whole of the route?

While looking at the impacts, table 9.8-4 indicates most “Geographical Extent” of impacts as 350ha. How can this number be consistent even for groundwater geographic extent? What is the land and underground impact zone? Similarly table 9.10 indicates only 350 ha of habitat removal, despite the earlier mention of 400ha.

As well these numbers do not clearly identify the water surface being used in the Harbour. What are the cumulative acreages of the LNG terminal and the marginal wharf given that the marginal wharf dimension is not clearly indicated in the body of the report? How can impacts of these marine structures be determined on both the environment and use of the Harbour by local fishermen, when the extent of their surface is not clear?

The archaeological and cultural studies also raise question in regards to what is included in the acreages covered by the report. “A historical background study was conducted for the entire 324 ha of land in Goldboro. However, the archaeological survey and recommended mitigation measures were confined to those areas expected to be directly impacted by construction (i.e. the footprints of buildings and necessary infrastructure).” (9-127) Why is this archaeological site study only 324ha? What does “entire” include? Is there a section in Drum Head being impacted which hasn’t been studied?

The EAC would like the Panel to consider how Nova Scotia’s public is supposed to be well informed about how much land they are loosing to this site given the way the numbers are expressed. How are hunters, trappers, ATV and wilderness users supposed to get a clear picture of how this project will impact their use of the land and the enjoyment of local residents property without a clear idea of how far this project is spreading? As well, the Panel must consider how accurately the cumulative impacts of the project and impacts to local habitat and species can be assessed given these confusing numbers.

## **Dam impacts**

The same situation happens when reading the impacts of the dam at Meadow Lake.

“The impoundment of Meadow Lake will flood approximately 295 ha of habitat, at least 122 ha of which is wetland. The dam will have a proposed footprint of about 170 m2.” (2-151)

“When impounded, Meadow Lake will increase from an existing area of about 104 ha to approximately 244 ha and the lake will go from the current maximum depth of about 2 m to a maximum depth of 4 m” (9-109)

“The impoundment of Meadow Lake will flood approximately 140 ha of habitat, much of which is wetland.” (10-21)

“GIS-generated simulations suggest that raising the lake's water level by 1m would yield about 1.42 million m<sup>3</sup> of water storage and a new lake surface area of approximately 185 ha. Raising the lake's water level by 2 m would yield about 4.00 million m<sup>3</sup> of water storage and a new lake surface area of approximately 244 ha.” (8-46)

*“The flooding of adjacent lands, however, will also flood approximately 3,300 m of the downstream reaches of tributaries now contributing to Meadow Lake. This is not considered a loss of habitat, but will be an alteration of aquatic habitat from riverine to lacustrine.”* (9-109)

*“Approximately 124 ha of wetland habitat will be removed including raised bog (8%).”* (9-97, section 9.12.2 Operation phase). (Why during operation? Shouldn't it be during the construction?)

*“Approximately 295 ha of habitat/vegetation will be removed (Meadow Lake)”* (9-91).

*“The dam proposed for use at Meadow Lake will have a footprint of about 170 m<sup>2</sup> located in existing aquatic habitat. This is considered a “loss” of fish habitat. Given that the impoundment will result in the creation of 140 ha of additional fish habitat, however, the 170 m<sup>2</sup> loss associated with the dam structure may be insignificant.”* (9-111)

Table 9.10 indicates only 140ha for the Meadow Lake impacts. New numbers appear as well in table 9.12-1 for geographic extent.

These numbers create a confusing idea of exactly of much land around, downstream and upstream from Meadow Lake will be impacted by the dam. It also makes it difficult to ascertain what type of fish habitat will be created? What impacts will there be if the proponent removes more habitat that it will flood. How can DFO determine what type of habitat compensation plan will be needed for the Meadow Lake species given the uncertainty in what, and how much of it, will be impacted based on these numbers. The above numbers indicate that 140ha of new habitat will be created but does not provide a clear picture if this will accurately replace the type of fish habitat at the dam site?

The proponent indicates having used GIS for the dam analysis yet does not make this information and its relying data available for public review. Would it not be a more precise way of determining the overall acreages impacted by the dam? In fact the upstream numbers are not shown or have not been found by this reader.

As well the EIA does not indicate the land impact if the dam were to fail. How much wetlands, homes and properties or habitat may be affected by a dam failure? What is the extent of acreages the water flooding out of the dam would affect? It is impossible to accurately determine the total effects of the dam nor their significance and reversibility given the lack of clarity in the numbers used.

## ***Impact Zone***

The total impact zone of the project is therefore difficult to determine based on the EIA use of numbers of land and water impacts. As well, when looking at the overall impact one can get confused when reading through the document. For example, the EIA states that regarding wells impacts the *“Residents in the area all use private wells, as described in Section 8.7. There are also approximately 1780 people within 30 km of Goldboro, although most of these are outside of the potential area of impact.”* (9-140) How can the EIA states this when there is no analysis as to the acreage extent of an accident at the petrochemical plant, and how this may effect the hydrological recharge cycle of the underground aquifers if these chemicals deposit on the soil, or in the waterways and linger in the pathways?

What is to total impact zone for the cumulative impacts of this project? For potential LNG spills and leaks of hydrocarbons, the EIA states *“Based upon this analysis, the coastal Study*

*Area for the Keltic Project was delineated to extend approximately 30 km on either side of the proposed project site in Goldboro, i.e., from Berry Head to the St. Mary's River estuary.” (8-98). Yet, it would seem that the cumulative impacts of this project when considered by the Panel and the ministerial decisions makers should exceed 30 km.*

Given the nature and size of the project and its potential impacts, the Panel should broaden the impact zone of the project to include such considerations as: the cumulative effects on overall population of affected endangered species; climate change impacts due to emissions of green house gases; impacts of the increase use of the 77 km road to Antigonish; and unknown extent to which chemical releases from the petrochemical will spread. Given all these considerations and those not identified by the proponent, what is the total impact zone of this project on land, water and health, and shouldn't they include cumulative effects?

## **Employment**

The inconsistent use of employment numbers was problematic in determining the economic benefits of the project, the health impacts and commuter traffic. This also seems to negate the project's value in addressing the reasons why the municipality rezoned the area.

Employment, as mentioned earlier, is one of the major reasons for encouraging industrial development in the currently undeveloped site. *“Furthermore, the population of Guysborough County has been in steady decline as a result of the employment situation; this trend is expected to be reversed with the establishment of this Industry” (4-1).* Though it is likely one reason why the population of Guysborough County has known a decline in recent decades, it may not be the major reason. The EIA fails to actually support its assumption and is partially misleading in justifying the needs for this project in its proposed location.

Given the size and nature of this project it is important for the Panel to consider if it will alleviate the unemployment situation in Guysborough County in a manner that justifies the environmental and health burden the residing citizens will be exposed to. The declining of Guysborough's population could be related to an aging population, the lack of alternative types of employment (especially for women) and the attraction of urban living and its amenities for younger generations. A deeper analysis of demographic trends should be reviewed by the Panel, or at least considered, given that such industrial development may actually create more social burden than it alleviates.

The Panel should consider the situation of women in the County as a social indicator determining the need for this project and its social and economic benefits, as well as its health impacts. Statistic Canada 2001 Census for Guysborough County shows that a little over half of the unemployed are women, and that in the County employed women make almost 50% less annual income than the male population. The skills currently required for most jobs offered by this project seem predominantly within the male population of the County. It is also important to keep in mind which segment of the population will receive most of the benefits and which segments will receive the environmental and health impacts. This project has social repercussions which are linked to its environmental, economic and health impacts.

## **Outflow**

The confusion that comes from reading this EIA is that despite the support of the Guysborough County authorities and the indicated need to provide employment and economic benefits to Guysborough County, the EIA indicates that most of the employment and economic benefits will go to Antigonish County. Yet, it is Guysborough land, water, air, species and population which will receive the negative impacts. Below are quotes from the EIA which related to construction and operation employment followed by related economics benefits, and comments.

## **Construction Numbers**

*“The construction work force is estimated to peak at approximately 3,000 people.” (2-35)*

Table 2.4-1 *Total employment during construction: 4772*

Figure 2.4-4 *Peak of “Number of required employees” 4000*

*“During the construction phase of the Project the supporting labour force should peak in the area of 4700 people. » (2-55)*

Table 9.3-1 never shows more than 2000 employees per construction quarter

*“Construction employment related to LNG receiving terminal construction, petrochemical plant construction, cogeneration plant construction, site preparation, site services and support services will total about 4,775 people who will be employed for varying lengths of time.” (9-50, 9-197)*

*“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. » (9-134, calculation for possible collision impacts)*

The difference between 4775 employees and 3000 is great considering not only the economic impacts, but the environmental pollution produced by these workers, as well as the extent of the health impacts to which they may be exposed.

## **Operation Numbers**

*“ Total employment at full operation will stand at about 624. The annual payroll of the facility will be about \$37.4 million.” (9-8,9-50, 9-197)*

*“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)*

*“The present estimated demand is 1200 m<sup>3</sup>/hr which would include domestic demand for an estimated work force of 600.” (4-9)*

*“The facility will likely work on a four shift basis. Approximately 210 persons will be on-site during the day shift and about 140 will be on site during the afternoon and night shifts.” (9-8)*

*“Based on the occupation profile of the operating labour force and the current labour supply and skill level situation in Guysborough County we estimate, in order of magnitude terms, the following labour source breakdown:*

- *current residents of Guysborough County, 155;*
- *new residents to Guysborough County, 95;*

- *current residents of Antigonish County and beyond, 280; and*
- *new residents to Antigonish County, 94.*” (9-9)

#### LNG Facility

“*The work force employed during the operations phase of the Project covering these activities should be in the neighbourhood of up to 110 skilled professionals, technicians, and labourers.*” (2-71) How many local residents are likely to have the LNG skills, given the high training required and the lack of LNG in Canada?

#### Cogeneration Plant

“*The total number of personnel operating this portion of the complex would be in the area of 50 individuals mainly composed of process operators and mechanical and technical support personnel.*” (2-71)

#### Petrochemical

“*Over 60% of the staff will be involved in actual plant production activities where the other 40% will be accomplishing periphery support activities. The amount of personnel required for the operations of the petrochemical plant will be in the neighbourhood of 290 individuals.*” (2-71)

The important aspect of these numbers is that they are not only used to estimate the amount of jobs that the project will provide, but they are also used to assess economic benefits, environmental impacts, safety impacts and health effects. These numbers are also used to explain measures to mitigate these impacts. Below are a few examples of where these numbers and their conclusions become misleading in providing a proper assessment of the impacts of the employment benefits.

“*The presence of approximately 3,000 workers and the expectation of long-term economic development at and near the site can be expected to increase demand for residential property and therefore potentially increase in property prices, in particular rental rates, during the construction period.*” (9-15)

“*It is unlikely that construction workers and their families will move into the area on a permanent basis as the construction project peak will be relatively short lived and there are no large construction projects that could retain these employees in the foreseeable future for the area. In addition, workers that would commute to the Goldboro area would likely prefer to retain their residence in the Antigonish County area to maintain their accessibility to construction work throughout the province and the rest of the Maritimes.*” (9-5, 9-6)

“*As discussed above, during the 33 month construction period, 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. During operation, the facility is expected to employ approximately 600 workers.*” (9-140, health impact section)

“*The demographic data indicate that Antigonish County, relative to Guysborough County, is an easier place for families to find work and raise children. Antigonish County is also easier for families and younger persons to settle in from other areas of northern and eastern Nova Scotia.*” (8-12)

“*Final needs and housing availability in the local area will be studied during the FEED phase of the Project to identify regional ability to support the physical needs of intended work force.*” (2-35)

The construction benefits to the economy of the area surrounding the site is contradictory in the EIA and makes it hard to determine exactly whether the loss of environmental integrity in Country Harbour area will be compensated by economic prosperity. Considering these statements, how can the economic spin-off to the area be beneficial during construction?

## Antigonish

*“We expect, in order of magnitude terms, about 280 workers at the facility to commute to work from Antigonish County and areas beyond. Given the size of the labour force and skill set in the Antigonish County area we estimate, that roughly, 94 workers could move into the area. Based on a typical household size of 2.5 persons this movement to the area would bring a total of about 235 persons.”* (9-9). This is confusing as above the EIA indicates 94 new residents not workers, and now it is 235 persons, but 94 new workers? Is this 94 new workers included in the 280 workers commuting from Antigonish County? Also, the EIA calculates impacts of 280 workers from Antigonish but states 94 new Antigonish worker/residents? Do they not work at the plant? Or should the estimate be 374 commuting workers?

*“Current and new residents of Antigonish County could gain approximately 375 jobs at the facility.”* (Antigonish County) (9-10)

*“For Antigonish County it is assumed that the facility will generate up to 280 jobs.”* (9-11)

*“We expect a significant portion of employees at the LNG facility and petrochemical plant to commute to work from the Antigonish County area.”* (9-9)

*“Based on the assumption that about 375 people will live in the County of Antigonish and work at the facility...”* (9-11)

*“Average household incomes would not change significantly because the average income is already quite high.”* (9-11)

Why does the EIA indicate the socio-economic benefits to Antigonish County (8.3.3.6.) and not for Guysborough County?

## Guysborough

*“We expect that the majority of the labour for construction will come from outside the Guysborough County area.”* (9-7)

*“Given current labour force numbers and skill levels we expect that about 155 residents of Guysborough County should be able to gain employment at the Project. Should education level improvement and training programs be successful members of the Guysborough County labour force age group will likely be able to improve their ability to win employment at the Project. These jobs will be relatively high paying and therefore will serve to bolster the retail and personal service sectors of the local economy. Assuming about 95 persons move to the area to take work at the facility..”* (9-10)

*“It is assumed that up to 155 jobs at the facility may be available for current residents of the Guysborough County.”* (9-11)

*“Based on the assumption that about 250 people will live in Guysborough County and work at the facility...”* (9-11)

Given the above mentioned benefits for new residents to move to Antigonish, what reasons would 95 workers move to Guysborough County? The report does not justify its assessment of the number of potential new residents to Guysborough County because of the site (estimated at 95 workers), nor how close to the site they would live.

The EIA leads to the idea that positive economic spin-off will occur in the communities immediately impacted by the project, however, these benefits are contradicted by its analysis, as shown above.

*“The number of dwelling spaces in the area closest to the Project, Goldboro, Drum Head, Seal Harbour, Cross Roads Country Harbour and Larrys River has a limited housing stock, in the order of 1,100 and has a history of population decline. The operation of the Project will bring opportunities for home renovation and construction due to increased incomes of current residents that will work at the Project and the influx of new residents.” (9-20)*

*“Increases in the number of jobs in the Goldboro area will contribute to the importance and viability of rural living in Guysborough County.” (9-13)*

How many current residents of the immediate area are within the age group for working at the site, have the experience and are likely to get the jobs given that less than 155 workers are expected to come from Guysborough County? How will the standard of living for Goldboro area residents improve if the business activity occurs mostly in Antigonish?

The EIA admits that most of the jobs are going to people outside the County, most of the workers will not move into Guysborough County but commute from Antigonish County, and most of the attractive places to live for families are in Antigonish county. Yet, again the environmental, health and socio-economic impacts will be felt mostly, though not only, in the immediate villages surrounding the site. Though the EAC can admit that on a short term individual basis the EIA conclusions that *“Changes in the level of employment and business activity affect the standard of living of individuals and can result in a change of the entire community.” (7-7 &8)* is correct, it does not apply in this project to the Country Harbour area. Looking closely at the report what positive economic benefits do exist in this project, they are not for the half dozen or so communities next to the site given which will suffer from both the short term construction impacts and the long term health and environmental impacts.

## **Training**

The EIA explains the proponents desire to assist with personnel training. However its approach to mitigate the potential of hiring mostly employed personnel must also be closely assessed.

*“A framework shall be developed for providing training and orientation to on site employees.” (2-72)* What about providing for training before employees on site? Helping those get off unemployment to get the jobs?

*“Increased employment opportunities can produce a shift in labour away from wood harvesting and milling.” (7-8, 9)* How will this project address unemployment if current employed workers end up being hired? What will Keltic do to avoid creating a shift from one industry to the other?

*“The higher paying jobs at the facility require special skills. To improve the chances of Guysborough County and Antigonish County residents to win these jobs, local economic development agencies need to be advised in advance of the occupations and skill levels required for the operation of the facility.” (10-5)* If Keltic does not provide the financial capacity for Guysborough residents to acquire the needed skills, how can the residents expect to acquire those skills given their underpaid, or unemployed status?

How can the economic benefits of this project apply to the local work force, as the proponent admits to not investing in training the unemployed labour force because of a very short construction phase?

## Must Consider

In reviewing this EIA and the project the environmental assessment board must consider a few points that related to both the need for this projects and its assessment of both the benefits and the impacts it will have on the local area and the region as a whole.

The question needs to be asked why Guysborough County is in the situation it is in now. How did it get there? What would have happened if oil and gas had not been exploited off the Easter Shore? These questions are important in realising that Guysborough County has huge potential and is at a turning point for where it wants to go and what part it will play in Nova Scotia's long-term wellbeing. If Keltic goes through, and with the municipalities desire to expand heavy industry in the wilderness, the area might turn out to be the equivalent of Sarnia Ontario. If Keltic does not go through, and the municipalities and the province work together, the area could become a sustainable development example of how to grow economically from the ground up utilising the resources, uniqueness and strength of the local communities.

Another question is what roles does this project play in adding or alleviate the burden of women in the County? Rural women in Nova Scotia shoulder much of the burden of keeping our communities alive. They often do most of the unpaid work, such as caregiving, volunteering, church and social programs, etc. They have the hardest time coming off unemployment and receiving assistance, and to this day most women still make less revenue per year than men. This project will contribute much social disturbance in the area, yet many women do not have the skills for the high paying jobs. Therefore, if an analysis was done of the cost versus the benefits of this project to the local women's wellbeing, would it balance out? Or would the burden of women be heavier than before?

This project admits to bringing employment mostly to Antigonish County and "come from away" with a very minimal amount of jobs in Guysborough County. If the County has to shoulder the social, cultural, health, environmental and economic impacts of this project; give up its land and water to it and has the highest unemployment rate in the province, why are most of the jobs going to people outside the County? How can it be beneficial to those most in need?

## Conclusion

Looking closely at the numbers used in the EIA, their distribution throughout the report, their justification and their role in permitting the readers and the environmental assessment board in assessing the project, it becomes difficult to support the notion that this project is needed in Nova Scotia and will be beneficial. More importantly, it seems looking at the total acreage and employment numbers, that those who will benefit from this project are not the ones that will suffer from the environmental, health and socio-economical negative impacts both for the short and long term.

This analysis focuses on a fragment of our concerns with the EIA and the project, more information on our concerns with the project can be found on our website (<http://ecologyaction.ca/lng/>).