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Lynn Gordon
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1053 Édifice Chambers Building, 40 rue Elgin Street
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June 6, 2012

Dear Members of the Committee,

Re: Study of Bill C-38, Part 3 "Responsible Resource Development"

Thank you for the opportunity to submit our comments to the Committee's study of Part 3 of Bill C-38.

West Coast Environmental Law Association ("West Coast") is a British Columbia-based non-profit organization of environmental lawyers and analysts dedicated to safeguarding the environment through law. One of Canada's oldest environmental law organizations, West Coast has provided legal support to British Columbians to ensure their voices are heard on important environmental issues and worked to secure strong environmental laws for almost 40 years. Through our environmental legal aid services, citizens and community groups who could not otherwise afford it are able to participate meaningfully and democratically in decisions about resource development that have the potential to profoundly affect their lives.

Since its founding, West Coast has been involved with various aspects of, including the precursors to, provincial, federal and joint environmental assessment ("EA"). West Coast was also involved in the development of the *Canadian Environmental Assessment Act* S.C. 1992, c.37 ("CEAA") and is active with the Environmental Planning and Assessment Caucus of the Canadian Environmental Network. We have a long history of serving on the federal government's Regulatory Advisory Committee ("RAC") and provide environmental legal aid to citizens and organizations involved in EA processes. We made submissions to the Environment and Sustainable Development's Seven Year Review of CEAA in autumn 2011[i] and the current House of Commons Finance Subcommittee on Part 3 of Bill C-38.

Summary of Submission and Recommendations

The government's four stated pillars of the "Responsible Resource Development" plan are to have: more predictable and timely reviews, less duplication in reviewing projects, strong environmental protection, and enhanced consultation with Aboriginal peoples.[ii] We do not disagree that these goals would be part of a robust environmental regulatory regime; however, we do not believe that the proposed amendments and new legislation in Part 3 of Bill C-38, as currently drafted, will accomplish any of the pillars and, in many cases, may actually hinder them. The changes contemplated in Part 3 amount to weakened protection for fish and species at risk, an entirely new and less comprehensive environmental assessment law, broad and

seemingly unchecked decision making powers for Cabinet and Ministers, and less accountability and fewer opportunities for public participation.

Working towards achieving those four goals is still possible, but will require a significant shift in the current legislative process and a re-write of the proposed environmental assessment and other proposed legislative amendments in Part 3.

Based on our experience and analysis, as set out below, West Coast recommends that the Standing Senate Committee on Energy, the Environment and Natural Resources make the following recommendations in its report:

Improve the process for consideration of Part 3

1. Remove Part 3 in its entirety from Bill C-38; conduct further scientific, factual and legal study and fulsome, open consultation on amendments to the environmental assessment (EA) process *including contemplated regulations and schedules to the new CEAA 2012* and other environmental regulatory measures contained in Part 3. After such study and consultation is complete and regulations and schedules have been drafted, introduce new proposed stand alone bills (at the earliest in the autumn session of the House) to be debated in the House and Senate and studied in Committee prior to enactment.

   We believe this is the only way to ensure this proposed new legislation is reviewed and modified in a fact-based, scientifically and legally defensible manner.

2. Failing recommendation 1 being included in the Committee's report, in the alternative: conduct thorough and broad consultation on regulations and schedules to the proposed Part 3 amendments and new enactments, and delay the coming into force of the new legislative provisions until after said consultation is complete and views expressed have been considered and incorporated into the regulations and schedules.

Increase transparency and accountability

3. In furtherance of the government's stated commitment to make government "more transparent, effective and accountable",[iii] that full consultation on proposed regulations and schedules to CEAA 2012 be carried out prior to enacting the new legislation. It is not possible to provide full legal or scientific analysis of CEAA 2012 and amendments in Part 3 in relation to other critical acts without key information that is contemplated to be included in regulations and schedule and without additional information disclosed regarding the government's subsequent legislative amendment intentions (e.g., further revisions to the *Fisheries Act*).

Follow a principled approach in environmental regulation and environmental assessment

4. If the Committee opts to recommend that Part 3 be delayed and the regulations be fully consulted on (our recommendation 2, above), then the Committee will *also* need to, at a bare minimum, make amendments to address the some of the most problematic sections of Part 3 (detailed in items a) through j), below) so that they will apply while the consultation on regulations is taking place.

These amendments will also work towards focusing CEAA 2012 on our ***Ten Principles on Environmental Assessment for a Healthy, Secure and Sustainable Canada***, described below and widely endorsed[iv] (noting that these amendments would not achieve the principled approach we recommend but doing so would require a complete reconceptualization of Part 3 and CEAA 2012 especially, as we set out in recommendation 1):

a) allow the National Energy Board (NEB) to retain its independence in final decision making on projects it is responsible for assessing;

b) mandate that all panel reviews must have three panel members;

c) rescind proposed amendments to the *Fisheries Act* and, instead, commit to a public process with independent scientists to explore ways to improve the Act without compromising fish habitat and aquatic/marine ecosystem health;

d) retain existing time limits for permits in the *Species At Risk Act* to allow for meaningful ongoing evaluation of impacts on endangered and other at risk species;

e) retain the existing triggering system for EAs that incorporates other legislation, or, if a project list approach is taken, include guidelines for the project lists within CEAA 2012 itself so that certain projects cannot be removed from the list by Cabinet alone;

f) provide provision for reasonable relaxation of EA timelines where projects warrant additional input, expertise or traditional knowledge;

g) include timelines in the EA process that proponents must also adhere to in order to provide increased certainty, predictability, and ability to manage time and engagement to the public, governments and First Nations;

h) retain from the existing CEAA the comprehensive definition of environmental effects and do not allow environmental components to be added or removed in an ad hoc manner by Cabinet;

i) to *increase* predictability and clarity regarding administration of the Act, decrease the number of decisions and ad hoc re-definitions of terms that can be done by the Minister or by Cabinet without public involvement, in particular in the Administration section of CEAA 2012 (sections 83 through 88); and

j) retain the right for concerned citizens and organizations to participate in environmental reviews for pipelines and in panel hearings (i.e., omit the definition of 'interested party' and especially its application to panels).

Discussion

I: Improve the Process for Consideration of Part 3

We understand that the Committee must work within constrained timelines to study and produce a report on Part 3 of Bill C-38. We understand that some Committee members may wish to produce a fact and science based report on Part 3 of Bill C-38.

We submit that, given the lack of critical information, such as that to be included in regulations and schedules and for which neither distribution (as in the case of the proposed project list regulation) nor sufficient consultation has been done (in the case of a two week comment period on two outlines for CEAA 2012 enabling regulations), and such as the mechanism by which cooperation or substitution with the provinces will be accomplished, it is impossible and impractical to undertake a complete a fair analysis of the proposed legislation that is grounded in fact, science and law. We note as well that the Agency published notice that "Regulations are currently being developed to enable the new legislation to come into force as soon as possible" on April 26, 2012 and that the consultation document for "Regulations Required to Implement the Proposed *Canadian Environmental Assessment Act, 2012*" was only available for public comment for two weeks. These initiatives are both inadequate in terms of timelines and give a strong indication that the government does not have any good faith intentions to make any amendments to CEAA 2012, despite ever-growing and deepening concern with Part 3 of Bill C-38 among scientists, labour groups, First Nations, former Conservative Ministers, and other experts nation- and North America-wide (e.g envirolawsmatter.ca/endorsers and blackoutspeakout.ca/partners.php).

We recommend that the Committee take a firm position on the need for additional information and therefore time before any Senator can feel justified in taking a position on the proposed legislation. For amendments to legislation to gain legitimacy and respect, they need to go through a proper process so that elected officials, civil servants, industry, First Nations and the public have a clear understanding of how the changes should function. As some witnesses have indicated before this Committee, while there is a willingness and in some cases a desire to revise the EA and environmental regulatory process, the current proposals leave many questions about implementation, roles and responsibilities, jurisdiction, duties, the role of science, and thresholds and criteria for projects to be listed on the project list.

Finally, Part 3 is tenuously, if at all, tied to actual budgetary measures and has much more far reaching impacts that go beyond the budget. Other than an alleged 'urgency', which the submission to this Committee by MiningWatch Canada de-bunked, to our knowledge the government has not provided a defensible argument as to why Part 3 should be included in this omnibus budget bill. The process for review EA in Canada has been flawed for over two years now and the government has had opportunity to do it thoroughly and properly but has chosen not to (see our submission to the House of Commons Standing Committee on Environment and Sustainable Development in November 2011[v]). The changes contemplated are significant and will have long term implications; ensuring those changes are made in a considered and comprehensible manner take precedence over rushing through changes that create more questions than they answer.

Recommendations

See items 1 and 2 in the summary recommendations section, above.

II: Transparency and Accountability

In March 2011 the government of Canada joined the Open Government Partnership (OGP), which is an international effort to make governments more transparent, effective and accountable. Under the OGP the government of Canada has put forward an Action Plan, with commitments to achieve these goals, in three areas: open information, open data and open dialogue. Tony Clement, President of the Treasury Board of Canada, stated: "The Government of Canada remains committed to fostering the principles of open government by putting forward this Action Plan. It offers Canadians greater opportunities to learn about and participate in government, in the economy, and in our democratic process."[vi]

We think that to honour this commitment, the government needs to be more proactive in its sharing of plans and detailed information. It cannot and should not ask parliamentarians to study and make decisions about proposed legislation in the absence of all the relevant information and facts. Moreover, it cannot expect such analysis, review and public buy-in of its proposals when they are being rushed through without proper consultation. This erodes the government's potential accountability and certainly does not advance open dialogue of controversial and important issues.

Recommendation

See items 1 and 3 in the summary recommendations section, above.

III: Lack of a Principled Approach

In February 2012, following the superficial review[vii] of CEAA by the Standing Committee on Environment and Sustainable Development, West Coast lawyers and our colleagues at MiningWatch Canada (Jamie Kneen), Ecovision Law (Stephen Hazell), and the Green Action Centre (Dr. John Sinclair) published a paper entitled, *Environmental Assessment Law for a Healthy, Secure and Sustainable Canada: A Checklist for Strong Environmental Laws*.[viii] The paper outlines ten foundational principles that strong environmental assessment legislation must include, at a minimum, to protect core Canadian values related to nature and democracy and ensure wise decisions are made about proposed development through an effective, efficient, inclusive and robust decision making process.

To date, 58 diverse organizations[ix] across Canada have endorsed these general principles (see envirolawsmatter.ca/endorsers).[x] Both the French and English versions of the full statement of principles are attached as **Appendix A**.

One of the intents of doing this *Checklist* was to hold it up against the legislative amendments the government did introduce and see where they met our basic principle and where they fell short. A more thorough 'report card' of this is likely to come. Below is some basic analysis of how Bill C-38 and the proposed CEAA 2012 measure up to the principles:

As set out in *A Checklist for Strong Environmental Laws,* **sustainability** needs to be a core objective of any EA process so that we can achieve a positive environmental and socio-economic legacy. Part 3 of Bill C-38, by contrast, narrows the definition of environmental

effect, allows for redefinition at any time of what an environmental component is, weakens fish habitat protections, gives pipeline projects a 'get out of habitat protection free' card in relation to protecting species at risk and their habitat, and will remove many projects from the EA process entirely. Overall, Part 3 does not acknowledge the interconnectedness of our ecosystems and the need to sustain all components to ensure the health and continued profitable use of our resources: we need a various aquatic species in the food chain to ensure the health of the 'economic fish', and we need functioning and healthy water cycle to provide water for agriculture and many industrial resource extraction or processing industries.

The *Checklist* also lists as a key principle the need for **Aboriginal governments to be meaningfully involved** as decision makers. Bill C-38's Part 3 by contrast dramatically limits the ability of the Crown to deal honourably with Aboriginal and Treaty rights by imposing rigid timelines that may not permit permit meaningful consultation as required by the Constitution and do not acknowledge the complexity of some projects and the various territories they can impact and rights they can infringe. The new CEAA 2012 also eliminates environmental assessments for many projects that may impact Aboriginal and Treaty rights. We also support the submissions of National Chief Atleo made to the House of Commons Finance Subcommittee on the inability or as-yet-to-be-demonstrated ability of Bill C-38 to enhance relationships with Aboriginal rights-holders.

Public participation is a component of EA that we believe can add real value. CEAA 2012 attempts to limit the ability of the public and experts to participate fully in different types of assessments, and provincial process generally do not provide for adequate public input either.[xi]

For review panel and NEB assessments, the new CEAA seems to buy into a false distinction between those who have relevant information or are affected enough to be worth listening to, and those who do not and who can be limited to letter writing, or shut out altogether. It is often easy to undervalue and discount the local knowledge, experiences and general public values that members of the public may want to bring to the table, but study after study shows that these voices result in better environmental assessments, and more public acceptance of the results. A 2008 study by the **U.S. National Research Council found that**:[xii]

> Substantial evidence indicate(s) that public participation is more likely to improve than to undermine the quality of decisions… Although scientists are usually in the best position to analyze the effects of environmental processes and actions, good analysis often requires information about local conditions, which is most likely to come from residents. Moreover, public values and concerns are important to frame the scientific questions asked, to ensure that the analyses address all of the issues relevant to those affected.
>
> It also suggests that public participation increases the legitimacy of agency decisions and builds citizens' knowledge of the scientific aspects of environmental issues assisting the effectiveness and efficiency of implementation.

Industry will always be able to pay for “experts”, who will be able to qualify as an “interested party” by virtue of their training and expert studies. Local citizens and members of the public should be allowed to rely upon their values and concerns to challenge the experts and ask hard questions. Unfortunately, at least in the NEB and review panel hearings, CEAA 2012 doesn’t value this type of input.

Undertaking **strategic EA** of policies of government is critical to integrate environmental considerations into government planning and decision making. This allows for better assessment of alternatives (which is also omitted from CEAA 2012) and assists in considering the cumulative effects of a project, and functionally and effectively streamlines project level EA by eliminating the need to address issues that have been resolved at the strategic or policy level. CEAA 2012 does not provide for strategic EA at all.

The ten principles also emphasize the importance of **regional, cumulative effects assessment.** By contrast, Part 3 of Bill C-38 is likely to eliminate environmental reviews for many smaller projects creating a real risk that the cumulative effects will not be addressed. The government has stated that there is some reliance on provinces to do this work but cumulative effects are not a required feature of provincial EA and provinces necessarily lack some of the jurisdiction and big picture ability to plan for and make decisions about coordinated and well thought out resource development on a national scale.

CEAA 2012 and amendment to the *Fisheries Act* contemplate giving much more authority to the **provinces** and having the federal government quietly remove itself from having a meaningful role in EA. We believe that a more consistent, predictable national EA regime would be the result of a *strengthened* federal role, not a weakened one. We support the submission of MiningWatch Canada on this point. Existing EA and fish management legal frameworks in the provinces and territories are extremely different and require major overhauls in order to prevent many projects from falling through the cracks when faced with federal abdication of its oversight role in EA.

Recommendations

See items 1 and 4 in the summary recommendations section, above.

Yours truly,

WEST COAST ENVIRONMENTAL LAW ASSOCIATION

Rachel S. Forbes

Rachel S. Forbes
Staff Lawyer

APPENDIX A

Statement of Principles:
Environmental Assessment for a healthy, secure and sustainable Canada
February 29, 2012

Canadians want strong environmental laws to protect our communities, ecosystems, health, and economy.

We the undersigned affirm that environmental assessment, through which potential impacts of proposed projects and plans are assessed before harm is done, is an essential tool to maintain a healthy, secure and sustainable Canada.

We endorse the following Statement of Principles as the foundational elements of any strong environmental assessment law that can deliver on core Canadian values related to the environment, democracy, and sustainable development.

This Statement of Principles offers a pathway to a system of environmental assessment laws that ensures sound and democratic decisions, upholds our Constitution, and delivers lasting and sustainable benefits to all Canadians.

Statement of Principles

Strong environmental assessment (EA) laws should be based on and measured against the following key principles:

1. Adopt sustainability as the core objective.
EA legislation should be directed, at its core, to achieving specific and measurable sustainability goals and leaving a positive environmental and socio-economic legacy.

2. Strengthen public participation.
An effective and inclusive EA should have early and ongoing processes to meaningfully engage the public in assessments of proposed projects or policies, including demonstrated participation opportunities from the initial identification of the proposal through to monitoring, full transparency and sharing of information not only by government but also by proponents. Meaningful engagement with the public also requires that funding is provided through an independent body for multi-faceted assistance to participants and on an early and ongoing basis.

3. Meaningfully involve Aboriginal governments as decision makers.
An EA process should respect and accommodate Aboriginal and Treaty rights, including Aboriginal title, with Aboriginal rights-holders having a meaningful role in government-togovernment decision making on resource development in their territories and all aspects of environmental planning and assessment.

4. Establish legal framework for strategic environmental assessments.
Strategic EA should systematically integrate environmental considerations into government planning and decision making processes relating to proposed policies, plans and programs and there should be public records to demonstrate how this integration has been carried out and implemented.

5. Establish legal framework for regional environmental assessments (REAs).
REAs undertaken ahead of industrial development, or a major expansion of development, should be carried out to help define the terms and requirements of subsequent project assessments as well as providing baseline data and analysis for subsequent assessments.

6. Require comprehensive, regional cumulative effects assessments.
Create and implement a mechanism so that comprehensive, regional cumulative effects assessments are conducted based on the need to manage for sustainability and the outcomes legally integrated into decision making.

7. Employ multijurisdictional assessment and avoid substitution.
Effective EA should require that all provinces and territories negotiate, in serious consultation with Aboriginal governments, and execute harmonization agreements with the federal government that: allow for predictable sharing of EA responsibilities; follow the highest standards and best practices; and allow for efficient administration of the process among all affected levels of government and departments.

8. Ensure transparency and access to information.
For any EA process to be credible and transparent, all project information, including that not required by the assessor but produced by the proponent, should be readily accessible online.

9. Make EA procedures more fair, predictable, and accessible.
Each type of EA should have predictable processes, actors, and procedures; but predictability of process must not be conflated with predictability of outcome. Even where simplified, each step in an EA should demonstrate how all information required to make the best decision, including that provided by Aboriginal peoples and the public, is being fully considered. An efficient EA regime should provide for clear rights of appeal for affected parties and for those with public interest standing.

10. Apply design principles throughout the EA process to ensure that focus and efficiency do not come at the expense of democratic and constitutional rights.
A successful EA regime must be applied broadly and consistently, while ensuring particular reviews are focused and efficient. Any policy or proposed project that could inhibit progress toward sustainability goals or cause significant adverse environmental impacts must undergo an EA.

Please see **envirolawsmatter.ca/endorsers** for a complete list of organizations that have endorsed the above Statement of Principles.

Déclaration de principes:
L'évaluation environnementale : pour un Canada durable, sécuritaire et en santé
le 29 février 2012

Les Canadiens veulent des lois environnementales fermes pour protéger leurs collectivités, leurs écosystèmes, leur santé et leur économie.

Nous, soussignés, déclarons que l'évaluation environnementale, processus par lequel les impacts potentiels de projets et de plans sont évalués avant que le tort ne soit fait, est un outil essentiel pour le maintien d'un Canada qui soit durable, sécuritaire et en santé.

La présente déclaration de principes offre une voie vers un système de lois sur l'évaluation environnementale qui fait en sorte que les décisions prises soient sensées et démocratiques, qui respecte la Constitution et qui offre des avantages durables à tous les Canadiens.

Déclaration de principes

Des lois fermes sur l'évaluation environnementale (ÉE) devraient être fondées sur les principes suivants :

1. Adopter la durabilité comme objectif central. La législation portant sur l'ÉE devrait être conçue à la base dans le but d'atteindre des objectifs de durabilité spécifiques et mesurables et de laisser un héritage environnemental et socio-économique positif.

2. Soutenir la participation active du public. Une ÉE efficace et rassembleuse devrait comprendre des mécanismes pour faire participer le public de manière significative dans les évaluations de projets ou de politiques proposées. Cela devrait inclure des occasions de participation dès le dépôt d'un projet jusqu'au stade du suivi environnemental ainsi qu'une transparence totale et un partage d'information provenant non seulement du gouvernement, mais aussi du promoteur. La participation significative du public implique le financement, via un organisme indépendant assurant une assistance à multiples facettes et ce, dès le début et tout au long du processus.

3. Assurer la participation active des gouvernements et décideurs autochtones. Tout processus d'ÉE devrait respecter et tenir compte des droits - ancestraux ou issus de traités - des peuples autochtones, dont les titres ancestraux, dans les échanges avec les détenteurs de ces droits qui jouent un rôle actif dans les prises de décision de gouvernement à gouvernement portant sur le développement des richesses naturelles sur leurs terres et dans tout autre aspect de la planification et de l'évaluation environnementale.

4. Mettre sur pied un cadre législatif pour des évaluations environnementales stratégiques. L'évaluation environnementale stratégique devrait systématiquement intégrer les considérations environnementales dans la planification du gouvernement et son processus décisionnel portant sur ses projets de politiques, plans et programmes. Il devrait aussi y avoir un registre public qui montre les détails de la mise en œuvre de cette intégration.

5. Mettre sur pied un cadre législatif pour des évaluations environnementales régionales (ÉER). On devrait procéder à une ÉER avant tout développement industriel -ou toute expansion importante d'une industrie existante- afin d'aider à définir les termes et critères pour les évaluations de projets subséquents et de rassembler les données de référence et d'analyse pour les évaluations subséquentes.

6. Exiger des évaluations régionales approfondies des effets cumulatifs. Mettre en place et instaurer un mécanisme pour que des évaluations régionales approfondies des effets cumulatifs soient effectuées en se fondant sur la nécessité de gérer pour la durabilité et que les résultats obtenus soient intégrés légalement dans le processus décisionnel.

7. Faire usage d'évaluations multi-juridictionnelles et éviter les substituts. Une ÉE efficace devrait obliger tous les territoires et provinces, de concert avec les gouvernements autochtones, à négocier et mettre en œuvre des ententes d'harmonisation avec le gouvernement fédéral. Ces ententes devraient permettre : le partage prévisible des responsabilités d'ÉE; se conformer aux plus hauts standards et aux meilleures pratiques; et permettre une administration efficace du processus à tous les niveaux des gouvernements -et leurs départements- impliqués.

8. Garantir la transparence et l'accès à l'information. Pour garantir qu'un processus d'ÉE soit crédible et transparent, toute l'information portant sur un projet donné, dont celle que l'évaluateur n'a pas exigée mais que le promoteur a produite, devrait être facilement accessible en ligne.

9. Rendre les procédures d'ÉE plus équitables, prévisibles et accessibles. Chaque type d'ÉE devrait exhiber des processus, acteurs et procédures prévisibles. La prévisibilité du processus ne doit cependant pas être confondue avec la prévisibilité du résultat. Même dans une version simplifiée, chaque étape d'une ÉE doit montrer comment toute l'information nécessaire pour en arriver à la meilleure décision, dont celle qui a été avancée par les peuples autochtones et le public, a été tenue en compte pleinement. Toute législation portant sur l'ÉE devrait comporter une procédure d'appel claire pour les partis en cause et pour ceux ayant la qualité d'intervenant dans l'intérêt public.

10. Appliquer les principes de conception à tous les niveaux de l'ÉE pour s'assurer d'être ciblé et efficace sans toutefois empiéter sur les droits démocratiques et constitutionnels. Une loi efficace portant sur l'ÉE se doit d'être appliquée de manière large et cohérente tout en garantissant que les évaluations particulières soient bien ciblées et efficaces. Toute politique ou projet qui pourrait nuire à l'avancement vers les objectifs de durabilité ou qui pourrait avoir des impacts environnementaux négatifs importants doit être soumis à une ÉE.

Please see **envirolawsmatter.ca/endorsers** for a complete list of organizations that have endorsed the above Statement of Principles.

[i] See West Coast's submissions to the Environment and Sustainable Development Committee on problems with its process and the insufficiency of the study conducted: http://wcel.org/resources/publication/letter-standing-committee-process-seven-year-review-canadian-environmental-ass
And our substantive submissions on CEAA: http://wcel.org/resources/publication/west-coasts-submission-seven-year-statutory-review-canadian-environmental-asse

[ii] As stated in the government's "Economic Action Plan" and re-stated by Ministers, including by Minister Oliver at the May 17th, 2012 meeting of this Subcommittee: http://actionplan.gc.ca/eng/feature.asp?pageId=448

[iii] Pursuant to Canada's commitment to the international Open Government Partnership http://www.opengovpartnership.org/countries/canada

[iv] http://www.envirolawsmatter.ca/statement_of_principles

[v] http://wcel.org/resources/publication/letter-standing-committee-process-seven-year-review-canadian-environmental-ass

[vi] http://www.opengovpartnership.org/countries/canada

[vii] See West Coast's submissions to the Environment and Sustainable Development Committee on problems with its process and the insufficiency of the study conducted: http://wcel.org/resources/publication/letter-standing-committee-process-seven-year-review-canadian-environmental-ass

[viii] A Checklist for Strong Environmental Laws is available at: http://www.envirolawsmatter.ca/environmental_assessment

[ix] For a list of current endorsers, see: http://www.envirolawsmatter.ca/endorsers

[x] The endorsed statement of principles is in English here: http://www.envirolawsmatter.ca/statement_of_principles and in French here: http://www.envirolawsmatter.ca/declaration_de_principes

[xi] Read more at: http://wcel.org/resources/environmental-law-alert/who-silenced-under-canada%E2%80%99s-new-environmental-assessment-act

[xii] http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=12434