



October 2, 2013

Joanne Weiss Reid
Project Manager – Sisson Project, CEAR #11-03-63169
Canadian Environmental Assessment Agency
1801 Hollis St., Suite 200
Halifax, NS B3J 3N4

Dear Ms. Weiss Reid:

Re: Mr. Wuest's letter requesting that review of the present EIA report for the project be terminated

CCNB Action Inc. has read Mr. Wuest's September 29, 2013 letter to the CEA Agency in which he highlights the incompleteness of the EIA report for the Sisson Project. In our on-going review of the EIA report, we have noted these same deficiencies. The incompleteness of the EIA report makes it extremely difficult for the public and decision makers to understand and weigh the environmental and social effects of the project. As such, we support Mr. Wuest's request that the current EIA report be withdrawn and that a revised EIA report be released only after all of the missing data is collected and analyzed. Coinciding with the release of the revised EIA report would be the start of a new 45 day period for public review and comment.

In addition to the above, allowing the present incomplete EIA report to be relied on by the proponent is not in keeping with the CEA Agency's 2009 operational policy statement, *Adaptive Management Measures under the Canadian Environmental Assessment Act*. This policy states (at p. 4):

"A commitment to implementing adaptive management measures does not eliminate the need for sufficient information regarding the environmental effects of the project, the significance of those effects and the appropriate mitigation measures required to eliminate, reduce or control those effects. Where additional information collection or studies are needed over the life-cycle of the project, such studies in themselves should not be considered "mitigation measures"." (emphasis added)

The spirit of the 2009 OAP is that EIAs are not complete until all necessary baseline data is collected. Without this, the effects of a project cannot be fully assessed.

Thank you for giving your time and attention to this letter. CCNB Action Inc. will continue its review of the present EIA report until it is withdrawn.

Regards,

Tracy Glynn

cc. Kim Allen, Project Manager - Environmental Assessment Section, NB Department of Environment