



Department of Environment and Local Government  
Education and Engagement Branch  
P.O. Box 6000, 20 McGloin Street  
Fredericton, NB E3B 5H1

July 17, 2015

**Re: Public Comment on the EIA Report of the Proposed Sisson Brook Mine, Project #1172**

Dear Sir or Madam:

Please find attached (via email) the Conservation Council of New Brunswick's (CCNB) comments on the above EIA Report.

As discussed in Part I of our comments, the proponent should not receive approval to construct and operate the proposed mine. It is our position that the proponent's conduct of the EIA and the poor quality of its EIA report for the project shows that it does not understand or care about the impacts of the mine on the environment and the future economic and social well-being of New Brunswick. Simply put, if the EIA is considered a test of the proponent's future ability and willingness to carry out the project in an environmentally and socially sustainable manner, then it has failed. Given this, CCNB requests that the Minister, under s.16(1) of the *Environmental Impact Assessment Regulation - Clean Environment Act*, recommend to the Lieutenant-Governor in Council that the undertaking (the mine) *not be approved* as proposed at this time. We further request that the Lieutenant-Governor in Council, under s.16(2) of the Regulation, not provide any approval that would allow the mine to proceed in whole or in part as proposed at this time.

If the proponent is given approval to construct and operate the mine, then CCNB believes certain conditions should be attached to this approval. These conditions are discussed in Part II of our comments.

Thank you for giving your time and attention to our comments. If you have questions regarding them, please do not hesitate to contact us.

Regards,

Stephanie Merrill  
Director, Freshwater Protection Program  
Conservation Council of New Brunswick



















mandate to improve, promote, and protect the health of the people of New Brunswick and given that the built environment and industrial projects are directly linked to the health of people in this province. CCNB has done extensive work in this area.<sup>10</sup>

While no legal triggers for HIA currently exist in Canadian or New Brunswick regulatory legislation, in 2009 the Senate Subcommittee on Population Health recommended “[t]hat the Government of Canada require HIA to be conducted for any policy, plan or program proposal submitted to cabinet that is likely to have important consequences on health” and “[t]hat the Government of Canada encourage the use of HIAs in all provinces and territories”. Furthermore, in 2004, Health Canada assembled a very comprehensive 4-volume Handbook on Health Impact Assessment in Canada. This handbook would provide a good starting point for developing a framework for New Brunswick.

The major steps in conducting an HIA include:

- Screening (identifying plans, projects or policies for which an HIA would be useful),
- Scoping (identifying which health effects to consider),
- Assessing risks and benefits (identifying which people may be affected and how they may be affected),
- Developing recommendations (suggesting changes to proposals to promote positive health effects or to minimize adverse health effects),
- Reporting (presenting the results to decision-makers), and
- Monitoring and evaluating (determining the effect of the HIA on the decision)

A Health Impact Assessment framework can be applied as a strategic policy direction, or applied on a project by project basis, e.g. the Sisson Mine project. An HIA can be performed independently from an EA or EIA, or can be complementary to the EA / EIA processes already in place. Designing the regulatory framework (i.e. a first and stand-alone process, or a complementary process), with legally binding HIA triggers, should be the mandate of the Office of the Chief Medical Officer of Health.

As part of the current open comment period on the Sisson Mine project, CCNB recommends the Department of Health, specially the office of the Chief Medical Officer of Health be given a more prominent and regulated role in the review of projects that trigger a federal or provincial environmental impact assessment process, including the Sisson Mine project currently under review. Specifically we recommend that the OCMOH be given the responsibility and the resources to develop an HIA framework template, which can be applied to the current review of the Sisson Mine project, and which can subsequently be adapted for use across multiple industrial project reviews in the province.

## **6. Proper consultations with First Nations**

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<sup>10</sup> Recent examples of CCNB's work on public health and environmental connections include:

Milewski, I. and Lui, L. 2009. Cancer in New Brunswick Communities: Investigating the new Brunswick connection.

Part 1: Moncton, Saint John and Fredericton. Conservation Council of New Brunswick. 40 pgs.

[http://www.conservationcouncil.ca/wp-content/uploads/2013/02/CCNB\\_Cancer\\_Report\\_1\\_English.pdf](http://www.conservationcouncil.ca/wp-content/uploads/2013/02/CCNB_Cancer_Report_1_English.pdf)

Milewski, I. and Lui, L. 2009. Cancer in New Brunswick Communities: Investigating the new Brunswick connection.

Part 2: Fourteen Urban and Rural Areas. Conservation Council of New Brunswick. 91 pgs

[http://www.conservationcouncil.ca/wp-content/uploads/2013/02/Cancer\\_Report\\_2\\_English-2.pdf](http://www.conservationcouncil.ca/wp-content/uploads/2013/02/Cancer_Report_2_English-2.pdf)

Peer reviewed publication of this work: Identifying at-risk communities for action on cancer prevention: a case study in New Brunswick (Canada) communities. *New Solut.* 2012;22(1):79-107.











