



NC/10-0090-20  
September 8, 2010

Joint Review Panel  
Enbridge Northern Gateway Project  
By Facsimile: (403) 292-5503/ 1-877-288-8803

Nature Canada and BC Nature have received participant funding from the CEAA to act as interveners in the JRP review of the Northern Gateway Pipeline Project (NGPP). Nature Canada is the national voice of naturalists in Canada. Its mission is to protect and conserve wildlife and habitats in Canada by engaging people and advocating on behalf of nature. BC Nature is a province-wide federation of naturalists and naturalists' clubs, with approximately 4,500 members. Its interest is the maintenance of the integrity of British Columbia's wide range of ecosystems and rich biodiversity, and in related public education. Nature Canada is also a co-partner in Canada of BirdLife International. As part of this partnership, Nature Canada implements the Important Bird Area (IBA) program in Canada. BC Nature coordinates the IBA program in British Columbia.

As we, and many other organizations, have noted, the extent of potential impacts of the Proposed Project is considerably greater than the scope of the proposed review. The Proposed Project has long-term implications for the health of BC's northern and central coastal ecosystems and communities, as well as for climate change mitigation and adaptation efforts that confront Canada. While the effects of oil and condensate spills and chronic discharges on land and at sea are included in the list of issues and terms of reference, other issues - notably the expansion of tar sand operations by an estimated 30% - are not. A comprehensive review requires that the JRP carefully examine the Project with all its implications, under all relevant domestic and international law and policy.

From the perspective of the environment and biodiversity, the current list is inadequate or overly general. In addition to the issues currently included, the List of Issues should include or explicitly note:

- The impacts (direct and from cumulative effects) of the expansion of tar sands operations related to the project, with respect to green house gas emissions and climate change, air and water pollution, habitat destruction and impacts on wildlife and their habitat, including woodland caribou (of which herds in Alberta are particularly endangered) and boreal birds.
- The impacts (direct and from cumulative effects) on protected areas and areas of high conservation value along the proposed pipeline route and in the Northern and Central BC Coast, like the Great Bear Rainforest, Gwaii Haanas National Park Reserve and

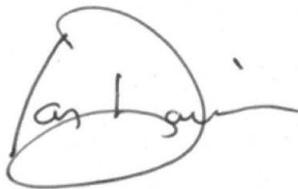
National Marine Conservation Area Reserve, and 28 IBAs in the Charlotte Basin and 6 IBAs along the proposed pipeline route.<sup>1</sup>

- The impacts (direct and from cumulative effects) on all federally and provincially listed species at risk, explaining how the project takes into account recovery and management plans and how the proponent would avoid and monitor all impacts on these species.
- The impacts (direct and from cumulative effects) on streams and rivers in salmon-bearing watersheds, as well as on caribou, grizzly bears, wolves and boreal birds (including through habitat destruction and fragmentation).

In terms of the application submitted by the Proponent, Nature Canada and BC Nature consider it to be incomplete, and inadequate to enable an adequate assessment of the effects of the Proposed Project.<sup>2</sup> We support the view that the JRP should not proceed with a hearing order until the Proponent has met their obligation of submitting a complete application.

Finally, with respect to the location for hearings, we believe that hearings should be held in (or near) every community that has identified itself as affected by the project. In addition, at least one hearing should be held in a major urban center in Alberta, British Columbia and Eastern Canada to allow other interested organizations or persons to participate.

Sincerely,



Ian Davidson  
Executive Director  
Nature Canada

On behalf of BC Nature and Nature Canada

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<sup>1</sup> [www.ibacanada.ca](http://www.ibacanada.ca) <<http://www.ibacanada.ca>>

<sup>2</sup> Given that the numerous inadequacies of the Application have already been noted in detail by others, including Ecojustice (public registry #A1T3S7, under A25470), Michel FN (public registry #A1U2I1, under A26068), and Coastal First Nations Great Bear Initiative Society (public registry doc #A1T7W0, under A25752), we refrain from repeating them here.