



GRAND COUNCIL TREATY #9

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BRIEF TO THE ROYAL COMMISSION ON THE NORTHERN ENVIRONMENT

by
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Timmins, Ontario
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Mr. Commissioner, the subject of my brief is the relationship between this enquiry and the current proposal to exploit the Onakawana Lignite Deposits some 170 miles North of here. ~~and~~ Further, I want to add_x to the rose-tinted perspective of this development presented by Mr. Wolff yesterday, some comment on matters that he did not treat. I should make it clear at the outset that I am not opposed to this non-renewable resource being exploited at some time, if it is of real benefit to the people of this province and represents a wise investment of whatever public funds are required to produce needed energy and create steady employment.

On the basis of the reports and studies that are available, I have serious reservations as to the wisdom of this development at this time. Furthermore, the issues raised by the Onakawana exploitation proposal are of direct relevance to the terms of reference of this enquiry; For example:

- this current development proposal has not yet been subject to a comprehensive technology assessment in the way that other major

resource developments have recently been assessed. I refer in particular to the current Alcan pipeline plans and the process it is being subjected to. ^(Onakawana Development Ltd) (ODL) propose that the Ontario Environmental Assessment Act process is adequate. It is not, for reasons I will outline below.

- the Onakawana development is a prime example of a single purpose, non-renewable resource exploitation with the likelihood of major environmental and social consequences for all northerners.
- little effort has been made to investigate the feasibility and desirability of alternative undertakings.

There are three basic questions that must be asked in weighing the positive and negative aspects of the current Onakawana proposal:

- (i) What is the real purpose of this development and, is it needed now?
- (ii) Who actually will benefit from this development?
- (iii) What are the true costs associated with the development and who will bear them?

The answers to those questions, Mr. Commissioner, are not clear and they are not likely to become clear unless the Onakawana proposal is examined in a public hearing as recommended by the Onakawana Task Force in 1973 involving due process with cross

examination of witnesses and complete disclosure of the engineering and economic facts behind this proposal, examination of the contractual relationship between the proponent and government, and critical analysis of the environmental, ~~and~~ social and economic consequences of this development. The Ontario Environmental Assessment Act hearings are not an adequate forum. Your commission I submit, could be.

Let me state the situation and some of my concerns: The concept of Onakanawan Development Ltd. is that the development would "serve the industrial and power generation needs of Ontario". The fact is that the Onakawana increment is not part of Ontario's power demand projections. Present hyrdo-electric installations on the Abitibi and Mattagami rivers serve local needs and there is still untapped, small scale, hyrdo potential on these rivers. On a provincial scale, Ontario is committed to Nuclear energy. The Bruce and Pickering Generating stations are functioning and further capacity is planned at Darlington. There is no proven need of Onakawana power. I will quote from the Onakawana Task force report:

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" failure to receive electrical energy from the conversion of the lignite deposits at Onakawana would not prejudice the adequacy or security of supplies of electricty in Ontario".

It is very doubtful that Ontario Hydro needs or indeed, wants this development at the present time. They have other plans. ^PThe dominating rationale for this development, the political rationale, the propaganda being used to tout-it around the North, is "jobs" and employment for aboriginal and other native northerners; again I quote form the Onakawana Task Force report: (page 13)

"The importance and desirability of proceeding with development relates very directly to the ability of the proposed project to serve the local people by providing employment opportunities".

Similarly, ODL in their brief put great emphasis on the employment aspects, job training, special arrangements for workers etc. We must pose *the* questions here, Jobs, but at what cost? How do these employment opportunities fit into the long term provision of a mixed economy in the North? When the high sounding phrases ~~to~~ *and* promises are stripped away, the answer is, very little. ODL are proposing essentially an old style, one shot ~~to~~ non renewable resource exploitation, with 1977 style acquiescence to the environment and to "social economics".

If we ask, who will benefit? it can be said that optimistically, there will be several hundred jobs for a promised 30 years, if other factors in the equation remain constant. Such employment is not to be sneered at. Concerning jobs for native people however, in spite of the hopes of the proponent native people do not have the skills or inclination for meaningful participation in this type of economic development. Employment and other returns to them as elsewhere in northern resource development, would be minimal. The only economic return to native communities would be the wage package. The real economic, social and environmental costs of this present, proposal have been glossed over, but there are many that will surface if the enterprise proceeds as planned and these costs will be borne by the local people, native and white, living downstream, downwind and indeed living in the entire Moose, Abitibi and Mattagami watershed.

I will only deal with the more obvious "hidden costs". I will not even attempt to come to grips with the intangible values and the cultural costs. ~~Those~~ ^{Those} moral issues that Karmel Talor-McCullum referred to last night in the brief by Project North. This brief expressed these moral issues more eloquently than could a mere materialistic scientist.

Let me list a few of the more obvious "hidden costs":

1. With a 1000 MW powerplant the cooling water requirements are enormous, the entire flow of the Abitibi river past the plant might be required for cooling and large amounts of chlorine contaminated thermal effluent would be released. This would radically alter the environment of the downstream river system and could lead to a drastic decline in the indigenous fish populations.
2. The mining itself involves massive drainage changes. ^{The} overburden of marine clays and silts become very erodable when disturbed in the stripping process. ^Lignite particles are readily suspended in water and require flocculation for removal. Unless massive and very stringent erosion control measures are applied, water quality downstream will undergo a severe decline for the life of the project.
3. The acidification question was avoided in the ODL brief. The feasibility studies, and I anticipate, the plant design, do not contemplate the scrubbing of sulphur compounds from the stack emissions.

This lignite has a lower sulphur content than many other coals in use, but the sulphur concentration is still significant (between 1 and 1.5% by weight.) Thus, if the station burns 18,000 tons of lignite per day, several hundred tons of sulphur are combusted. If this is not stripped from the stack emissions it will contribute to acidification of the atmosphere and increase the acid rain and snow burden that falls out over Northern Ontario and Quebec. (There is also an inter provincial problem here in that at certain seasons, the prevailing winds are Westerly and would blow the emissions over Quebec. There is already litigation before the courts in Quebec concerning acid rain and associated heavy metal (in particular, Mercury) contamination of rivers and lakes. The Plaintiffs are the Cree people of Northern Quebec and the Defendants include a smelter currently producing SO_2 and heavy metals in its emissions.)

This acid rain is a very significant hidden cost, as Dr. Kramer has already mentioned to this Inquiry. It reduces forest productivity and the productivity of rivers and lakes. In extreme cases you end up with the sort of landscape found around Sudbury. This cost must be anticipated by scrubbing of the aerial emissions.

4. Another hidden cost relates to the difficulties of rehabilitating the area that will be strip mined in the life of the project. The parent company of Onakawa Development Ltd., Minalta Coal Ltd., must be very aware of the difficulties and costs experienced in rehabilitating and re-vegetating areas that they have mined at Estevan, Saskatchewan and elsewhere.

Mr. Wolff's ~~rosy~~ picture of regenerating vegetation and wildlife is, at best, an experimental possibility. These procedures are not standard practice in the West or elsewhere; they are only experimental. Furthermore much of the cost in the West has been borne by Government agencies. Alberta also has specific legislation to deal with this problem, the Alberta Land Surface and Reclamation Act, which gives wide discretionary powers to the responsible minister and allows for the issuance of specific reclamation orders by Reclamation officers. Ontario has no ~~such~~ such legislation and has little ^{experience} ~~expertise~~ in strip mine rehabilitation.

5. We must also ask what are the hidden costs that are charged against the public purse? What are the tax incentives, special concessions, government contributions to the infrastructure of the development such as roads, transmission lines, to job training programs, project monitoring surveillance, rehabilitation etc.? In one way or another Ontario will pick up many costs associated with this development that will not be charged as project costs.

In summary, Mr. Commissioner, notwithstanding yesterday's submission by O.D.L., I can see only limited advantages - jobs and perhaps unneeded electrical generation, but many disadvantages and hidden costs which will have to be borne by those who live in the North. This brings me back to a theme that you have heard many times in the past few weeks. That is, the need for a coherent integrated and long term perspective on Northern Development. There is also a need for a critical evaluation of the ~~existing~~ decision-making process. At the moment the effective factors are the proponent and Queen's Park (in particular the Ministry of Natural Resources) but the Northern people including the aboriginal peoples must also participate. Part of the decision-making process is the assessment of the major enterprise. Very soon, the terms of reference of the Onakawana Impact Assessment under the terms of the ^{Environmental} Assessment Act are going to be set, essentially by Government officials.

If this development were in Northern Quebec, the terms of reference of the assessment would be established by a ^{process involving the} ~~committee made up of 1/3rd~~ Cree people, ~~1/3rd~~ provincial representatives and ~~1/3rd~~ Canada. In Quebec, native people would also participate in the evaluation of the assessment and in the formulation of the final statement. Mr. Commissioner, Ontario is way behind even Northern Quebec. Mr. Commissioner, such local participations in the decision-making process relates directly to your mandate.

If we want to prevent the mistakes of the past we must take a holistic look at Northern Development.

~~Furthermore,~~ Onakawana cannot be looked at in isolation as it would be under an Assessment Act Hearing. This development is only one component

of economic development north of 50th. Water control dams might be part of the Onakawana Development. ^{Would} ~~Does~~ this preclude, or influence, further Hydro electric development? What is Ontario going to do with a 1,300 MW generating station up there after Coal deposits are depleted? If the plan is to add a nuclear, maybe even a fast breeder reactor increment around the turn of the century then this eventuality should be considered. The Onakawana Development as recommended by the Task Force should be placed in the context of a comprehensive development plan and, I would suggest, land use and management plan. It is not and cannot be at the present time. Realistic alternatives must be evaluated before irreversible commitment of financial and other resources takes place. In seeking alternatives, the voice of the people of Grand Council Treaty #9 must be listened to. Only then can Ontario start to come to grips with its North and only then can the people of the Ontario Arctic watersheds start to have confidence in the planning and growth of the North.