

From: Des Nobels
To: [Kitimat Clean Refinery / Raffinerie de Kitimat Clean \(CEAA/ACEE\)](#)
Subject: Fwd: Kitimat clean EA
Date: August 11, 2016 9:48:08 PM
Attachments: [Kitimat Clean EA.docx](#)

On behalf of the United Fishermen and Allied Workers Union-UNIFOR ,please consider and include these comments when reviewing the Application Information Requirements for the Kitimat Clean Refinery proposal. Thank you, Des Nobels

**COMMENTS ON
DRAFT GUIDELINES FOR THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT
pursuant to the Canadian Environmental Assessment Act, 2012,**

KITIMAT CLEAN REFINERY PROJECT KITIMAT CLEAN LTD.

The UNITED FISHERMEN AND ALLIED WORKERS' UNION-UNIFOR represents fishermen, tendermen and shoreworkers on the BC coast. Our members harvest and process many species of fish that may be impacted by the Kitimat Clean Project.

The draft guidelines include the impacts of the project on fish and fish habitat. Any EA must include fresh water and marine impacts on fish.

The EA should also include the impacts of the project on fisheries. The impact on fish is not the same as the impacts on fisheries. The impact on fisheries by one stock negatively impacted by the project can far outway the value of that particular fish stock.

For example, DFO's Wild Salmon Policy (WSP) requires the maintenance of all salmon stocks at a level of healthy abundance:

As spawner abundance decreases, a CU moves towards the lower status [Red] zone and the extent of management intervention for conservation purposes will increase. p.16 WSP

Within the Red zone, there will be a level of abundance that cannot sustain further mortalities due to fishing or change to freshwater or marine habitats. p. 18 WSP

The actions taken to protect one stock can impact fisheries on co-migrating stocks to the point that fisheries on co-migrating stocks will be restrained or prevented. Such an example took place this year (2016) in the seine fishery at the entrance to Douglas Channel. DFO was uncertain about the strength of salmon stocks returning to the Kitimat area and therefore restricted the seine fishery which was targeting fish returning to other areas, because they might impact Kitimat area stocks. Protecting one stock or species of fish can cost far more than the actual economic value of that fish, as other harvestable fish might be forgone.

As well, Kitimat houses the only salmon production hatchery on the north coast. It supplies commercial fishers with large economic benefits. Again, negative impacts on any wild salmon stocks in the Kitimat area can prevent or reduce fisheries that can take place on hatchery salmon.

The Union therefore asks CEAA to ensure that impacts on commercial fisheries be included as a Valued Component.

Sincerely,

Joy Thorkelson
Northern Representative

and Valued components

– a change that may be caused to fish and fish habitat, marine plant and migratory birds (VCs) refer to environmental biophysical or human features that may be impacted by a project.