

Gary Swann - Port Alberni, British Columbia

Dear Andrew Rollo and Rachel Shaw,

Please see the attached comments submitted on behalf of the Alberni Environmental Coalition with a focus on sustainable development in Version 7 of the d'AIR/ EIS Guidelines for Raven Underground Coal Project.

Thank-you for considering our comments and recommendations around assessing the sustainability of this proposed project that could potentially have a great impact on the future of Vancouver Island, British Columbia and beyond.

Comments on Sustainable Development in the draft AIR/EIS Guidelines for the proposed Raven Underground Coal Mine.

Prepared for the Alberni Environmental Coalition June 17, 2011

Sustainable Development

The CEA Act 4(1b) sets out the requirements regarding sustainable development.

"The purposes of the Act are...to encourage responsible authorities to take actions that promotes sustainable development and there by achieve or maintain a healthy environment and a healthy economy."

On page 27 of Version 7.0 this purpose is affirmed. However, within the EA process itself, the contribution or detraction of the proposed Project to sustainable development is not specifically addressed. (See Joan Kuyek's Comments on the Socio-Economic Sections or the dAIR/EIS Guidelines)

The Alberni Environmental Coalition recommends that the proponent be obligated to assess the sustainability of the Raven Underground Coal Mine using the Natural Step framework. (see naturalstep.org or naturalstep.ca).

The Natural Step framework is a scientifically based systems approach for analyzing proposed projects for their impact on sustainability.

Many governments, communities, organizations and individuals use the Natural Step framework, to

guide development to a more sustainable future. It is recognized as a world leader in sustainability analysis. The B.C. Ministry of the Environment, at one time, had some institutional knowledge of The Natural Step framework.

Will this project, including its production, make the world, Canada and British Columbia more sustainable or less sustainable? This is important information for the Canadian public and the Minister(s) responsible for making the decision on the Raven Underground Coal project.

Comments on Sustainable Development in the draft AIR/EIS Guidelines

for the proposed Raven Underground Coal Mine.

Prepared for the

Alberni Environmental Coalition

June 7, 2011

Gary Swann
Director

Sustainable Development

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