

Submission to Canadian Environmental Assessment Agency  
Aug 10/2010

Minister of the Environment

Andrew Rollo, Project Manager  
Canadian Environmental Assessment Agency  
805-1550 Alberni Street  
Vancouver, BC  
V6G 1A5

Dear Sir

RE: Raven Underground Coal Mine Project (THE CEAR# 10-03-55529)

I ask that you deny approval for the proposed Raven Mine project. My objection to this mine is based on guidelines under the Canadian Environmental Assessment Act:

*“cumulative environmental effects [that] are likely to result from the project in combination with other projects or activities that have been or will be carried out”  
and*

*“Any effect or change [on] health and socio-economic conditions”*

Since I do not live in the area of the proposed mine, my rationale for asking you to deny approval of this project is based on the science of climate change which is, and will, impact all areas of the world. Virtually all credible scientific organizations from all countries in the world (including Canadian) have recognized that emissions of greenhouse gases will lead to an acceleration of climate change events.

Climate change/global warming will impact all aspects of our society and environment. In just the case of food production, the rule of thumb is that with every one-degree C rise in average global temperature, the world will lose 10 percent of its food supply. In some places, crops will be damaged by drought; in others by much hotter temperatures. Even as I write this, Russia is announcing a loss of 20% of their grain production due to drought and high temperatures never before experienced in parts of their country. In BC, we have lost billions of dollars of pine forests due to the spread of the pine beetle -a result of warmer winters.

So the cumulative environmental effect of this mine is the harm it will have on our global social health - virtually all the carbon from coal in this mine will end up in the atmosphere. This means that climate change is a vastly more critical factor than any local environmental impact from this mine. The massive and incontestable evidence from climate change science shows that:

- greenhouse gas emissions from human activities cause global warming,

- global warming threatens the well being, health, economies and existence of peoples and nations around the globe,
- drastic reductions in CO<sub>2</sub> emissions are required right away to stabilize the world's climate,
- coal is the dirtiest of fossil fuels which, when burned, emits the highest levels of the greenhouse gas CO<sub>2</sub>,

BC annually extracts about 26 million tonnes of coal which, when burned, emits about 56 million tonnes of CO<sub>2</sub>, almost doubling the province's annual 67 million tonnes of CO<sub>2</sub> emissions from all sources. So while the BC government advocates steep reductions in CO<sub>2</sub> emissions, it also advocates the export of coal from BC, with the full knowledge that that this coal will release CO<sub>2</sub> into the global atmosphere. This policy contradicts the government's commitment to reduce greenhouse gas emissions in the interests of the health and safety of our society (not just the environment).

Economically feasible energy alternatives are available that will allow coal fired energy plants to be phased out - for example, natural gas could replace coal in existing plants until non-fossil fuel energy plants are installed.

Much of the coal exported from BC is used to manufacture steel; however, other substitute technologies will inevitably be developed if governments put a high price on carbon emissions and phased out coal mines. Substitutes could include the use of carbon fiber as a replacement for steel in cars. In Europe, a large R&D program called ULCOS (Ultra Low CO<sub>2</sub> Steelmaking) is looking at alternatives to high carbon emission steel production. And biologists know that spider webs are stronger than steel.

The BC carbon tax both implicitly and explicitly concedes that emissions of greenhouse gases cause social and environmental harm. However, this tax is estimated to reduce emissions by only 3 Mt per year after 2020 relative to business-as-usual emissions growth. By comparison, BC coal exports in 2008 led to another 52 Mt of emissions - almost doubling the province's annual 67 million tonnes of CO<sub>2</sub> emissions. Therefore, local goals to reduce carbon emissions are meaningless unless we phase out coal exports.

Since the Canadian Environment Assessment Act recognizes the need to preserve our environmental and social health, the proposed Raven Coal Mine should be denied.

Sincerely,

Peter Nix  
Environmental Scientist, M.Sc. (retired)  
<contact information withheld>  
Duncan, BC

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