

Presentation to
THE ENVIRONMENTAL ASSESSMENT REVIEW PANEL
ON MILITARY FLYING ACTIVITIES IN LABRADOR AND QUEBEC

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The militarization of the North began during World War II. Across the North, airports were built in order to move troops and war materials to the battlefields of northern Europe. In 1942, for example, the United States government constructed Kuujjuaq airport for use by the U.S.A.F. in the "Crimson Route" operation, a route for flights between California and northern Europe. Goose Bay is another example of an airport planned and built by the United States government to be used by the military as a link between North America and northern Europe.

After the War, the North became even more militarized. When, as part of the NORAD Plan, the United States and Canadian governments decided to build a defence system known as the DEW line and mid-Canada line, military bases and radar stations were built across the Arctic. Later, with the advent of use of nuclear energy, military bases were built to harbour nuclear submarines. Today, "one half of the Soviet nuclear submarine fleet is based at Murmansk, and Soviet S.L.B.M. submarines are now deployed in the Soviet Arctic basin" (Independence and Internationalism, p.135). United States nuclear submarines are also found in these areas, thus making nuclear submarines in Arctic waters a common place.

In the Northwest Territories, the McKenzie River is being used as a test site for the Cruise missile, and the DEW line is being modernized in a project called the "North Warning System." Together they are bringing more aircraft and military personnel into the Arctic. Since 1980, whole regions of Labrador and Québec have been used for low level flight training. And now, the entire NATO Force is considering construction of a Tactical Fighter Weapons Training Centre (TFWTC) in Goose Bay, Labrador, and participating in these low level flights.

This escalation of military activities in our northern region is, to say the least, frightening. Assuming that the NATO and Warsaw Pact are necessary, some of these military activities are also necessary. But for

all intents and purposes, the militarization of the North comes into contradiction with the perception Canadians hold of their country, their belief that 'Canada is a peaceful nation.'

Individually, not all military activities are disruptive to the environment and to the people of the North. However, when it comes to low level flying, and particularly to the TFWTC, there are grounds of serious concern over the impacts that these activities may have on both social and environmental factors. The combination of these activities could dangerously affect the fauna and the flora of the region and, as a consequence, jeopardize our hunting and fishing activities.

A case in point is the George River caribou herd. Any disruption of that herd would negatively affect not only the people of Kuujjuaq but all the Inuit of Northern Québec. Every year we need approximately 5,000 caribou to feed our families and to furnish skins and other vital by-products. Caribou are also, through sport hunting, an essential part of the northern economic system. Caribou sport hunting and outfitting is a source of cash income for many Inuit in our communities.

The caribou are only one of our main concerns. We are also very worried about the impacts that low level flying may have on migratory bird populations, fish, lakes, rivers, the land and the Inuit as a people. We have heard that the exhaust emission from these planes may be a direct cause of water and flora pollution. We have also heard from the Inuit using the George River that the noise level from these planes is extremely high. Native people have reported that the noise may burst children's eardrums, cause deafness, and frighten children and adults alike away from their hunting grounds.

As a result, low level flights might very well affect Native people as individuals and as members of a society and culture. They are disruptive of our way of life. They threaten our present and our future. They endanger our culture and our society.

Our Native neighbours from Ntesian are right when they say that these flights and other military exercises are conducted over and on their land without their permission. The Innuuts have aboriginal rights on their lands, which should be recognized and respected. We also have aboriginal rights and these too should be recognized and respected.

The military has never respected these rights. They have been using the land, the air and the sea for over 40 years without even acknowledging the presence of Native people and, even less, respecting their aboriginal rights. We were never informed of these activities until the planes were flying just above our heads. Our land has been used as if it were desolated and uninhabited. To paraphrase Justice Berger, the North is not a frontier, it is our homeland.

It took years of effort and a common front of many Native groups to finally obtain some information on the military activities on our land and to have this Environment Assessment Review Process (EARP) set up. All of these efforts have not been in vain, and we are confident that the process will be fruitful and profitable to all concerned. For this reason, we have reviewed and commented on the Draft Guidelines for the Preparation of an Environmental Impact Statement on Military Flying Activities in Labrador and Québec.

Our recent experience with environmental impact assessment has not been a good one. The construction or renovation of airstrips and airport facilities in our communities gave rise to a somewhat misleading and deceiving impact assessment process for the Inuit. In retrospect, what emerges from an examination of the process "is a very serious shortcoming between the stated objectives of the social and economic impact studies, the specific findings of these studies and the real application of findings after the review process. At the present time, much of what the community stated in terms of economic and social benefits or concerns has been totally ignored when planning and carrying out construction" (An Overview of Concerns of the Present State of Impact Assessment, p.3).

One of the stated objectives of the draft guidelines is that "all groups and populations potentially affected by the Project should be consulted to ascertain the value that they place upon the various components of the ecosystem" (Guidelines, p.10).

Consultation is an essential part of any environmental impact assessment (E.I.A.) process be it with the public or with professionals. In the proposed guidelines, however, the principle of consultation is not clearly defined. With no definition, the term consultation can assume any number of attributes, or none at all. Thus, we would like a better indication of what consultation means to the Panel, and how the members perceive the process.

Consultation must be organized if all the interested parties are to be provided with opportunities to express their concerns, wishes and values. This can be a time-consuming operation at best, and the remoteness of the communities in the affected region could make it even more lengthy. Both the Native and non-Native populations in each communities must be interviewed so that all interests and concerns may be expressed without prejudice. It is important that the Process provide for continued community consultation so that needs are made known and proper consideration be given to them in the planning and management of the Project.

Consultation will be especially important when it comes to defining terms such as "values" and "significance." The Panel refers to both in the guidelines and requests that they be defined in the E.I.S. Such concepts, however, can only be properly defined after a meaningful consultation with the affected population has gone on. Beanlands and Duinker (1983) refer to the use of social scoping versus ecological scoping as a means of prioritizing necessary studies. We can only emphasize the fact that such a social scoping exercise is of absolute necessity to the success of the assessment and its acceptance by the Native population.

To achieve this type of consultation, good coordination of all research activities is essential. Otherwise the seemingly endless succession of researchers, each doing his own consultation in his own way, leads to a totally erratic process with no links or relations between the steps. Without proper coordination the end result is confusion, not consultation.

We would also like to see the communities involved in the research aspects of the E.I.A. The Inuit of the region are the ideal source for studies on wildlife or environmental phenomena. A good example of their knowledge has emerged from the Inuit Land Use Study of Northern Quebec being carried out by the Makivik Research Department. The data were collected in a long series of interviews that allowed Inuit hunters to express their perception of the ecology and environment of the region in which they live and hunt. This information is very detailed and provides evidence of historic and present Inuit land use over all of Quebec and Labrador. Thus, the integration of Inuit knowledge could be critical to the success of any proposed studies.

For example, the historic information could aid the proponent considerably in describing the "existing environmental conditions" (Guidelines, p.9), if the Panel is referring to conditions prior to the existence of an air base in Goose Bay. This would be an appropriate starting point for the E.I.S., as it would provide a picture of the natural and human environment before introduction of air base activities.

Monitoring is another very important component in environmental impact assessment. There has been much criticism in the literature that monitoring has not received adequate attention in the E.I.A. process. Indeed, in the proposed guidelines, the term monitoring is never defined, nor is its implementation explained. We are concerned that this lack of definition may lead to a poorly conducted monitoring process in the current assessment and its subsequent review.

Monitoring tends to be viewed in terms of studies to test the success of impact predictions and proposed mitigative measures. However, monitoring can be viewed in the much larger perspective of watching over the whole impact assessment and the subsequent implementation and operation of the project. In this sense, monitoring is a type of "watch dog" activity which ensures that all aspects of the E.I.A. process are implemented as proposed and continue to be so over the life of the project.

We would like to see a "watch dog" committee formed whose role would be in the broader sense of monitoring. Such a committee would have to be involved from the early stages of the process so that it could observe the conduct of all studies prior to presentation of the E.I.S. The committee would then take on the role of enforcing all mitigative measures and supervising the prescribed monitoring studies. This role would continue, along with further monitoring studies, for the life of the project so that any unexpected or residual impacts that might occur can be detected and the operation of the air base can be monitored to make certain that it conforms with the plans described in the E.I.S.

We are also concerned about what might happen to the E.I.A. if NATO were to lose interest in the Labrador airbase. Will a more appropriate time frame be considered, or will all studies be terminated at that instant, since they may well be deemed unnecessary. It is our opinion that now that EARP has been initiated, it should be carried out to its conclusion even if NATO decides to go elsewhere.

On this same line of thought, it was noted that the possibility of a "No Go" scenario, and its related impacts, was not given much consideration in the guidelines. Such a scenario is as important, if not more so, than any of the others proposed and thus should be given greater consideration both in the guidelines and in the studies conducted. Once again, such a scenario is closely linked with our concern for what would happen with the E.I.A. should NATO drop its plans for the Training Center.

The Panel divided the Project into two components in the proposed guidelines, one considering the possible new training center at Goose Bay and one which considers a continuation of the current training program. While we believe the breakdown of the assessment into the two separate parts is a good strategy, there is some concern that the two components are not that dissimilar. If the low level flight training is expected "to increase in the coming years", then it could well approach the same level as if the new NATO Training Center were built. We feel that a greater description of what Component 1 (Guidelines, p.7) will comprise of in the coming years is a necessity. We also believe that the Panel should consider making a decision on how much of an increase in training activities at the present base should be allowed, if any.

One of our final concerns with the proposed guidelines is the consideration of "cumulative impacts or interactions" that the Project may have on the region. Nowhere is "the region" clearly defined. Obviously, a number of projects will arise in the immediate vicinity of Goose Bay if the NATO training center is built. In addition, other projects might develop in regions further north as a direct result of a new training center in Goose Bay. It is these projects that we feel should receive greater attention in the current assessment so that a more regional planning perspective can be envisaged. If such future projects are anticipated, the broader "region" will be able to produce plans and/or alternatives for the management of these proposals thus limiting the impacts that such projects might have on the population and environment.

As a final comment we would like to add that the speed at which EARP has been initiated and is expected to carry out the assessment resembles the "shot-gun" approach that E.I.A. in Canada has become known for. Much criticism has been expressed in the literature about unrealistic deadlines for good scientific studies. In the south, such an approach may work because of the large data base available on many different subjects. The North, however, does not have such a store of information and time is

required to develop the scientific knowledge needed for the decision-making process. Is this assessment, and its one year time frame, another case of the "shot-gun" approach? How can an adequate data base be produced for such a large project in one year and responsible decisions made from this base? After all, "the ultimate purpose of an assessment study is to influence decision" (Beanlands and Duinker, 1983: 67) and if poor studies are carried out, poor decisions will result.

SUMMARY

To recapitulate our main concerns with the proposed guidelines and recommendations

1. We would like studies to be conducted on the impact of low level flying on :
 - a) the lifecycle and migration of the George River caribou herd and caribou in the affected area
 - b) the disruption of migratory bird routes and possible nesting and hatching grounds
 - c) the possible disruption of fish migration and spawning beds.
2. We would like studies to be carried out on the impact of exhaust emission on water and flora pollution in order to determine the extent of contamination that may occur and any resultant impacts.
3. We would like careful studies done on the amount of noise the low level planes will create and the possible impacts this may have on our families and children. and on the wildlife we hunt.
4. We would like to see consultation and the consultation process more clearly defined in the guidelines so that it will be both adequately and correctly conducted.
5. We would like a social scoping exercise, as described in Beanlands and Duinker (1983). to be used to aid in the definition of the terms "value" and "significance".
6. We would like to see involvement of the communities in as many research aspects of the E.I.A. as possible so as to ensure Inuit input into the process.

7. We would like the term "monitoring" to be better defined in the guidelines and its proposed implementation explained.
8. We recommend the creation of a "Watch Dog" Committee whose role would be to provide surveillance and enforcement of all monitoring studies and mitigative measures if the Project is implemented.
9. We would like the guidelines to give greater attention to the consideration of a "No Go" scenario in the environmental impact statement (E.I.S.).
10. We would like a more detailed description of Component 1 of the project so that a better distinction between the two components can be made.
11. We feel a definition of "the region" should be included in the guidelines to clarify the "regional impacts" that will be considered in the E.I.S.
12. We would like to have the assurance of the Panel that, if NATO were to drop Labrador airbase project, the E.I.A. would continue on a more appropriate time frame and decisions made as to how much flying should be permitted at the airbase.

References Cited

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