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Ms. Sheri Young  
Secretary to the Board  
National Energy Board  
517 Tenth Avenue S.W.  
Calgary, Alberta T2R 0A8

June 23, 2016

Dear Ms. Young,

We strongly urge the National Energy Board to reject Northern Gateway's recent sunset clause extension request. Since the conclusion of the Joint Review Panel process, new developments have provided further support to our position that the Great Bear Rainforest is no place for pipelines and tankers.

Since the review process concluded, several peer-reviewed studies have provided further evidence that this project poses far too great a risk to wild salmon ecosystems and economies. A report by the National Academy of Sciences states that diluted bitumen poses a unique risk to marine ecosystems, sinking in water if not cleaned up immediately. These findings mean that the proposed mitigation measures for cleanup and recovery in the event of a spill are likely economically and technically impossible. This is contrary to information presented to the NEB during the Northern Gateway review process in 2013. Furthermore, a study published in *PeerJ* in February 2016 showed that noise from marine traffic can potentially mask killer whale echolocation clicks that are used for foraging and navigation. This suggests that oil tankers could interfere with the ability of threatened killer whale populations residing in the Great Bear Sea to hunt for food, care for their young, and maintain their complex social bonds.

We also request that you consider the recent commitment of the Government of Canada to fully implement the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP). According to Article 32(2) of UNDRIP, "States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploration of mineral, water or other resources." Over 100 First Nations have declared opposition to the project through the Save the Fraser Declaration and the Coastal First Nations Declaration, and numerous First Nations have gone to court to challenge the original Joint Review Panel recommendation and federal decision. A permit extension would be in direct contravention to this federal commitment to the rights of indigenous peoples.

Furthermore, approval of the extension request would be incompatible with the Government of Canada's commitment to formalize an oil tanker ban on B.C.'s north coast, as stated in mandate letters issued by Prime Minister Justin Trudeau to Minister of Transportation, Marc Garneau and former Minister of Fisheries, Oceans and the Canadian Coast Guard, Hunter Tootoo. Widely supported by First Nations,

municipalities, organizations and citizens across B.C., this ban would prohibit the extensive crude oil tanker traffic upon which the Northern Gateway proposal hinges.

Lastly, the greenhouse gas emissions resulting from this project – both upstream and downstream – make it incompatible with Prime Minister Trudeau’s commitment to reducing Canada’s greenhouse gas emissions by 30 per cent by 2030.

We urge you to reject the extension request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caitlyn', with a long, sweeping horizontal line extending to the right.

Caitlyn Vernon  
Campaigns Director  
Sierra Club of BC Foundation