

Submission to the UNESCO World Heritage Centre / IUCN Mission to Wood Buffalo National Park and World Heritage Site, May-June 2016

FROM: Sierra Club of British Columbia Foundation (“Sierra Club BC”)

Sierra Club BC appreciates the opportunity to share our concerns with the Mission. This submission and the oral presentations to follow represent a culmination of nearly three years of sustained effort by our organization. In 2013, our increasing concern about the impacts of the proposed Site C dam not just in British Columbia, but along the entire Peace-Athabasca watershed, led us to seek a legal review of available international remedies. Based on the legal review compiled by the University of Victoria Environmental Law Centre, Sierra Club BC prepared a draft briefing recommending a petition to the UNESCO World Heritage Committee. In 2015, The Mikisew Cree, using this draft as the basis for their formal submission, successfully petitioned the UNESCO World Heritage Committee. This submission and associated process led to the Reactive Monitoring Mission being invited to visit Canada in May/June 2016.

The focus of this submission are concerns associated with the proposed Site C dam in northeastern British Columbia, including (a) the project’s impacts on Aboriginal and Treaty rights, (b) upstream impacts on the Peace watershed and the B.C. population, and (c) downstream impacts on the Peace Athabasca Delta.

Site C Project – Background and History

In 2011 the British Columbia Crown utility, BC Hydro, initiated the environmental approval process for Site C, a proposed third dam and generating facility on the Peace River. The Peace River arises in the Rocky Mountain Trench in north-central British Columbia, flows through British Columbia and Alberta, and ultimately drains into the Arctic Ocean. The 83-kilometre reservoir would flood the Peace River as well as the lower reaches of several tributaries, including Halfway River and Moberly River. Site C is planned to generate up to 1,100 megawatts of capacity and an average of 5,100 gigawatt hours of electricity per year.

The provincial and federal governments appointed a Joint Review Panel (“JRP”) to determine whether Site C was likely to cause significant adverse environmental, economic, social, health, and heritage effects, and to record assertions of impacts on the Aboriginal and treaty rights of the affected First Nations and Métis peoples. However, the JRP’s mandate expressly excluded downstream impacts on the Peace Athabasca Delta. The JRP was also explicitly barred from making findings on Site C’s impact on Treaty rights.

The JRP issued its Report in October 2014. Despite a number of adverse findings (including that the proponent had failed to prove the need for the power, and that Site C would have severe

and unmitigable impacts on First Nations), and a recommendation to conduct a cumulative impact assessment before proceeding with the project, in December 2014 the government of Canada and the British Columbia provincial government issued environmental certificates for Site C.

The JRP Report Findings

The Joint Review Panel concluded the following:

- That Site C is likely to cause a significant adverse effect on fishing opportunities and practices for the First Nations represented by Treaty 8 Tribal Association, Saulneau First Nations, and Blueberry River First Nations, and that these effects cannot be mitigated;¹
- That Site C would likely cause a significant effect on hunting and non-tenured trapping for the First Nations represented by Treaty 8 Tribal Association and Saulneau First Nations, and that these effects cannot be mitigated;²
- That Site C would likely cause a significant adverse effect on other traditional uses of the land³ for the First Nations represented by Treaty 8 Tribal Association, Saulneau First Nations and Blueberry River First Nations, and that some of these effects cannot be mitigated;⁴
- That Site C would likely cause significant adverse cumulative effects on current use of lands and resources for traditional purposes;⁵
- That there would be significant adverse effects on heritage resources for both aboriginal and non-aboriginal people;⁶
- That the proponent had failed to prove the need for the power on the timetable set forth.⁷

As noted above, the JRP did not make any findings on the downstream impacts on the Peace Athabasca Delta.

¹ Joint Review Panel Report, p. 103.

² Joint Review Panel report, p. 109

³ According to the submission of Treaty 8 Tribal Association, 42 sites of cultural or spiritual values would be flooded. These include spiritual places, burials, medicine collection areas, teaching areas, ceremonial and prayer offering places, and locations associated with place names and oral histories. Joint Review Panel Report, p. 111-112.

⁴ Joint Review Panel Report, p. 113.

⁵ Joint Review Panel Report, p. 120.

⁶ Joint Review Panel Report, p. 238.

⁷ Joint Review Panel Report, p. 306.

Current status of Site C

Site C is currently the subject of multiple legal challenges, including by West Moberly and Prophet River First Nations (in both provincial and federal courts) and Peace valley landowners (in provincial court). The process surrounding the decision to proceed with Site C has also triggered an investigation by the B.C. Auditor-General's office. The UNESCO World Heritage Committee had also asked Canada to conduct a cumulative impacts assessment that includes the Peace Athabasca Delta, which to date has not been done. Despite all these controversies and concerns, the B.C. government is aggressively pursuing a schedule of works that includes temporary bridge construction and logging of riverbanks.

Impacts of Site C on Aboriginal and Treaty Rights

Site C would impact a number of First Nations and Métis in British Columbia, Alberta and the Northwest Territories. First Nations represented by Treaty 8 Tribal Association have established treaty rights to use the impacted area for food, cultural and spiritual purposes according to their seasonal rounds; other First Nations have established Aboriginal rights. The Treaty 8 Tribal Association stated that Site C "cannot be reconciled with Treaty 8 Tribal Association values and uses of their lands, nor can it be reconciled with the ongoing use of the Peace River valley as a refuge for wildlife, as a place for agriculture, and as a place where Treaty 8 First Nations' cultural and spiritual values can be protected".⁸ Twenty-one First Nations groups under this treaty have asserted that the project would directly oppose to their rights on the land by rendering this land unsuitable for their traditional and cultural activities due to the important impacts the project will have on hunting and fishing successes, as well as contamination of desirable species.⁹

West Moberly and Prophet River First Nations have stated their opposition to the Site C dam, and are pursuing legal challenges to the Site C dam on the basis of violation of their treaty rights. Notwithstanding the established treaty rights of these Nations, the British Columbia government is aggressively pursuing the dam construction, while Canada is failing in its constitutional and fiduciary duty to uphold aboriginal and treaty rights as defined by the Supreme Court of Canada *In Re R. v. Sparrow*.¹⁰ The Site C dam would interfere with the treaty rights to hunt, fish and pursue traditional livelihoods by contaminating the remaining fisheries in the upper Peace watershed with methylmercury¹¹, severely reducing moose populations¹¹, and

⁸ Joint Review Panel Report, p. 431.

⁹ Joint Review Panel Report, p.125

¹⁰ <http://scc-csc.lexum.com/scc-csc/scc-csc/en/item/609/index.do>. For a summary of the precedent-setting value of the Sparrow case for indigenous rights and the fiduciary duty of the Crown, please see <http://indigenousfoundations.arts.ubc.ca/home/land-rights/sparrow-case.html>.

¹¹ A study commissioned by McLeod Lake Band and West Moberly First Nations, conducted an analytical analysis of mercury in tissue samples from 57 Bull Trout that were caught by members McLeod Lake Indian Band and West

preventing the maintenance of a viable population of Grizzly bears. By choking off a crucial wildlife corridor (the Peace River Break through the Rocky Mountains), the Site C dam would hinder migration of wildlife attempting to cope with climate change, thereby affecting the availability of game for First Nations hunting not just in the immediate region but through the northern Rockies.¹²

Under section 35(1) of the Constitution Act, 1982, the government has the duty to undergo meaningful consultations with First Nations affected by a project¹³. Canada is also a signatory of the UN Declaration on the Rights of Indigenous Peoples, which enshrines the principle of free, prior and informed consent.

The Joint Review Panel only “received information” regarding the manner in which Site C “may adversely affect asserted and established Aboriginal and treaty rights”. The Panel’s terms of reference explicitly excluded the ability to draw conclusions on the scope or strength of Aboriginal rights, the scope of the Crown’s duty to consult or accommodate Aboriginal groups, or whether Site C is an infringement of Treaty No. 8 rights. Nowhere did the British Columbia or federal governments’ decision-making process include the test of “free, prior and informed consent”. Indeed, in the face of explicit opposition asserted in a court of law, the governments decided to proceed with the project.

The governments of British Columbia and Canada have failed to give adequate weight to the Site C dam’s impacts on indigenous people’s food security, through impacts on hunting and fishing, and the contamination of remaining native fisheries, as outlined above.

Upstream impacts at the dam Site and on the British Columbia population at large

Ecological impacts in the region: The Joint Review Panel has identified numerous severe environmental impacts within the defined scope of the project. These impacts include significant adverse effects and adverse cumulative effects on fish and fish habitat, on at-risk and sensitive ecological communities, on wetlands, on rare plants, on a large number of wildlife species (more than 30 species), and on migratory birds and their habitat¹⁴. The project will

Moberly First Nations in accordance with their traditional seasonal rounds from the Crooked River, which is connected to the Williston Reservoir (the W.A.C. Bennett dam upstream from the proposed Site C). Methylmercury was initially released from the flooding of 1,700 km² of land for the construction of the W.A.C. Bennett dam. The study found that 98 per cent of the Bull Trout samples had tissue mercury concentrations that exceeded the guideline of 0.1 mg/kg wet weight (ww), based on the consumption of approximately 1 kg of fish per week. This is the guideline that most closely approximates West Moberly and McLeod Lake fish consumption in accordance with cultural practices.

¹² Submission by the Yellowstone to Yukon Conservation Initiative, Joint Review Panel Report, p. 89.

¹³ Government of Canada, *Constitutions Acts 1867 to 1982* (2016). Online: Government of Canada, <<http://laws-lois.justice.gc.ca/eng/Const/page-16.html>> [WBPN webpage].

¹⁴ Joint Review Panel Report, sections 4-5-6

likely have significant adverse effect and adverse cumulative effects on fish health, survival, and movement, as well as a significant loss and alteration of fish habitat. These effects, along with the loss of migratory birds' habitat, cannot be mitigated.

These acknowledged massive ecosystem impacts and biodiversity loss are of great concern, especially in this area already suffering cumulative impacts from other present or planned resource exploitation projects. In addition, since these resource exploitation projects are relatively recent, it is hard to evaluate the long-term extent of the cumulative impacts on the environment.

Site C's contribution to climate change: In the lead-up to COP 21, Canada's Intended Nationally Determined Contribution (INDC) states that it will use "low-impact hydro" as one of its "investments to encourage the generation of electricity from renewable energy". Site C cannot be remotely considered low-impact hydro. It would flood over 100 kilometres of valley bottom, triggering a release of methane for many decades to come. Large dams are a globally significant source of methane emissions¹⁵, a source that countries are required to acknowledge and count under IPCC guidelines.¹⁶ At the same time, the dam would destroy the carbon sequestration and biodiversity services and functions of what is a largely intact pristine ecosystem.

Failure to provide for food security as climate change adaptation to prevent human suffering: The Site C dam would also have an impact on food security for the British Columbia population as a whole, through flooding of uniquely productive lands capable of providing fruits and vegetables to satisfy the nutritional requirements of 1 million people – one quarter of the B.C. population.¹⁷ Only 5 per cent of the land mass of British Columbia is suitable for agriculture; as a result, the province is heavily dependent on food imports from California and other areas that are experiencing severe, ongoing climate-related drought and loss of productive capacity. As a result the prices of fruits and vegetables are rising and this trend is expected to continue.¹⁸ The governments of British Columbia and Canada have failed to provide for food security as an essential climate adaptation measure to avoid or at least reduce human suffering from climate change.

¹⁵ <http://pubs.acs.org/doi/pdf/10.1021/es501871g>

¹⁶ http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_p_Ap3_WetlandsCH4.pdf

¹⁷ "Diminished and dismissed", Expert report submitted to the Joint Review Panel by agrologist Wendy Holm, P.Ag.

¹⁸ For a British Columbia-specific study of impacts of climate change on food prices, please see this 2014 study commissioned by British Columbia's premiere credit union:

https://www.vancity.com/AboutVancity/News/MediaReleases/FoodStudy_October_10_2014/

Downstream impacts on the Peace Athabasca Delta (“PAD”)

Wood Buffalo National Park is the second largest protected area in the world with nearly 4.5 million ha of protected land in Northern Alberta and the Northwest Territories in Canada¹⁹. In 1983, it was granted status as a UNESCO World Heritage Site due to globally significant concentrations of migratory wildlife, and unique natural phenomena which include the PAD, salt plains and gypsum karst that are equally internationally significant (Criterion vii). The park is also the largest and most ecologically complete example of the entire Great Plains-Boreal grassland ecosystem in North America. It is the only place where the predator-prey relationship between wolves and wood buffalo has continued, unbroken, over time (Criterion ix). Wood Buffalo National Park finally contains the only breeding habitat in the world for the whooping crane, an endangered species brought back from the brink of extinction through careful management of the small number of breeding pairs in the park. The park’s size, complete ecosystems and protection are essential for in-situ conservation of the whooping crane (Criterion x). These three criteria constitute outstanding universal values that made the park a marvel of the world. Such a productive and unique territory is supported by complex and interconnected hydrological channels of the PAD, which is also a Ramsar wetland. PAD exists due to the interaction between the Athabasca River, the Peace River, the Birch River, and Lake Athabasca²⁰. PAD includes many lakes and kilometers of wetlands essential for the health of the park.

The major threats identified by different hydrological experts for the Peace Athabasca Delta specifically are the threat to Delta hydrologic recharge, the cumulative threats coming from many stressors, and the threat in relation to climate change. We will go over each of them in detail.

Threat to PAD hydrologic recharge

The ecological processes that take place within the Peace Athabasca Delta are driven by complex mechanisms that are sometimes taking place hundreds of kilometers from the Park. One of the most important ecological processes of the Delta is its hydrologic recharge coming from the Peace River where Site C is planned to be built. Indeed, the Peace River, through one of the following four ecological processes, replenishes the Peace Athabasca Delta which is essential for the health of the wetland ecosystem and lakes, many of them not being directly connected to flow channels and being only replenished by floods:

¹⁹ United Nations Educational, Scientific and Cultural Organization (UNESCO), *Wood Buffalo National Park* (no date). Online: UNESCO, <<http://whc.unesco.org/en/list/256>> [WBNP webpage].

²⁰ Ramsar, *Peace-Athabasca Delta* (2014). Online: Ramsar, <<http://www.ramsar.org/peace-athabasca-delta>> [WBNP webpage].

- During sustained high water levels on the Peace River, the flows cause **hydraulic damming** of outflows from Lake Athabasca leading to higher water levels on Lake Athabasca.
- When the Peace River flow is high and the levels of Lake Athabasca are relatively lower, the Peace River can cause a **flow reversal** on Rivière des Rochers and the Quatre Fourches connecting the Peace River to Lake Athabasca.
- When the Peace River flow is high, the Peace River can cause the Baril and Claire Rivers to **reverse flow**, which may allow Peace River water to enter Baril Lake and Lake Claire.
- The Peace River can contribute water to the northern portions of the PAD through overbank flooding when **ice jams** of sufficient size and duration form on the Peace River during spring break-up.²¹

According to hydrological expert Dr. Carver and based on an important amount of paired-reviewed scientific studies, Site C is likely to have an impact on the Peace Athabasca Delta water recharge mechanisms in many ways (Prowse²², Peters²³, Beltaos²⁴, Conly²⁵, and Kellerhals²⁶)^{27/28}. First, the hydraulic damming and flow reversal mechanisms are influenced by high-magnitude Peace River freshet peak flow, and sustained summer freshets of the Peace River. These two influencing factors have experience changes due to flow regulations from the two already existing dams present on the Peace River, and it is predicted that Site C will add greater stress on these influencing factors due to changes in the annual open-water hydrograph, and the reservoir filling.

Indeed, according to Environment Canada, the controlled water flow will experience an increase from 58% to 63%, and BC Hydro acknowledged that the peak flow that will be experienced downstream will be reduced²⁹. No research has been done regarding the effect of

²¹Joint Review Panel Report, p.36

²² T.D. Prowse and F.M. Conly *Effects of climatic variability and flow regulation on ice-jam flooding of a northern delta* (1998) *Hydrological Processes*, 12(10-11) at 1605-1606 [Prowse & Conly]

²³ D.L. Peters et. al., *Flood hydrology of the Peace-Athabasca Delta, northern Canada* (2006) *Hydrological Processes*, 20 (19) at 4092. [Peters et al. 2006]

²⁴ S. Beltaos et. al., *Ice regime of the lower Peace River and ice-jam flooding of the Peace-Athabasca Delta* (2006) *Hydrological Processes*, 20 (19) at 4028.

²⁵ Conly FM & TD Prowse 1998. Temporal changes to the ice regime of a regulated cold-regions river. In: *Ice in Surface Waters*, HT SHen (ed), p 41-48

²⁶ Kellerhals R *Factor Controlling the level of Lake athabasca* (1971) Research Council of alberta Contribution No 516, Canada 57-109p.

²⁷ M. Carver, *Impacts of the Proposed Site C Dam on the Hydrologic Recharge of the Peace Athabasca Delta: Submission to the Site C Joint Review Panel* (25 November 2013), at 6. Online: CEAA, <<http://www.ceaa-acee.gc.ca/050/document-eng.cfm?document=96375>> [Carver Report].

²⁸M. Carver, *Response to BC Hydro's Rebuttal Report* (21 January 2014), at 35. Online: CEAA, <<http://www.ceaa-acee.gc.ca/050/documents-eng.cfm?evaluation=63919&type=4>>.

²⁹ Carver at 27

the dam reservoir filling on the PAD. Impacts on the PAD from the two present dams on the Peace River also give important clues on how Site C might impact the hydrologic recharge of the PAD. By simulating natural flow, which is flow in the absence of hydroelectric dams, Peters and Buttle (2009) have shown that with the flow regulation starting in 1969, the extent of flow reversal has declined by 90% (Craver Response p.11). Although BC Hydro argues that the drying of the Delta since 1969 (year of the dam construction) is due to natural changes in the ecosystem, many peer-reviewed research papers using hydrologic modelling and field work disagree (Prowse, Peters, Beltaos, Conly, Kellerhals). For example, Kellerhals (1971) constructed water budgets of the Peace Athabasca Delta to identify the change in hydrologic recharge with regulation, and found that the four to five foot decline in Athabasca lake level between 1968 and 1970 (the dam on the Peace River was constructed in 1969) was attributed evenly between regulation and change in climate³⁰. BC Hydro has disregarded these researches in its environmental assessment, preferring research (e.g. Perspectives held by Dr. Timoney) that was not peer-reviewed, but that arrived at the desirable conclusions³¹. Environment Canada also raised similar concerns regarding the research used by the proponent to justify the exclusion of the PAD from the scope of the environmental assessment.

Second, of the three mechanisms essential to the Peace Athabasca Delta hydrologic recharge, ice jam is the most important. Beltaos *et al.* (2006) identify three conditions necessary to produce an ice-jam flood that would reach all of the perched basins in the PAD: 1) the ice on the Peace River must be broken mechanically by the rising waters of the spring freshet, rather than gradually melting; 2) the river flow must reach at least 4,000 m³/s; and 3) an ice-jam must form on the Peace River no more than 50 kilometres upstream from the PAD³². Carver also added that low freeze-up levels, and ice-jam release waves must be present³³. According to Carver, these two factors are likely to be affected by Site C.

Concerning the low freeze-up levels, hydro-electric dams on the Peace release more water in the winter, when more power generation is needed. This results in winter ice forming at a higher level (higher freeze-up level instead of low), and therefore requiring a larger spring freshet to cause a mechanical breakup. However, water regulation via dams has also reduced the average size of the spring freshet. The overall would decrease the number of ice-jams forming, impacting the natural flooding of these inland wetlands.

³⁰ Kellerhals at 26

³¹ Carver, p.15 at 28

³² S. Beltaos et. al., *Ice regime of the lower Peace River and ice-jam flooding of the Peace-Athabasca Delta* (2006) Hydrological Processes, 20 (19)

³³ Carver at 27

The ice-jam release waves might not be as much present or effective following the construction of Site C. The Peace Athabasca Delta reach is very shallow and therefore depends on waves originating from steeper reaches located 400-650km upstream³⁴. It is however unclear how Site C might affect downstream ice extent, and freeze-up levels and timing, which in turn might have a significant effect on ice-jam release waves. It is also extremely concerning that BC Hydro has not mentioned or assessed these issues of great importance to the survival of PAD, nor did it have included the potential downstream impacts of the project on the PAD in the Joint Review Panel Terms of Reference.

Cumulative threats to the PAD

The cumulative threats to the Peace Athabasca Delta were not taken into consideration when BC Hydro decided to exclude the PAD in its environmental impact statement. The PAD experiences cumulative impacts from the two existing dams on the Peace River as mentioned in the section above, and major impacts from the oil sands. This submission will not go into detail of oil sand impacts, as this topic is being covered by other groups.

Threats to the PAD in relation to climate change

According to Dr. Carver, the impacts of Site C on hydrologic recharge of the PAD will likely be increased in size with climate change. For example, BC Hydro estimated the Lake Athabasca water level decline due to future Site C water regulation to be a maximum of 1cm. This was however when assuming a lake level of 208.5 meters. If the lake level is changed to 208 meters, the predicted maximum decline in lake level jumps up to 4cm.³⁵ This raises important questions regarding how climate change might influence the predicted impacts of Site C.

Climate change has also affected the ability of ice-jamming to occur, impairing the most powerful agent of water recharge of the PAD while also increasing the evaporation rate of the perched basins, which can only be replenished through ice-jamming. Indeed, higher temperatures resulting from climate change cause evaporation to occur more quickly, meaning that more frequent flooding and ice-jams are required to sustain the perched basins. However, ice-jamming is expected to become less frequent with climate change due to warmer winter temperatures changing the freezing pattern of the river³⁶. Site C is likely to further reduce flooding and ice-jams in the region, so the threat of climate change on the PAD will likely be amplified.³⁷

³⁴ Beltaos at 22; BC Hydro, *Response to Dr. Carver's Report filed by ACFN and MCFN on November 25th, 2013* (18 December 2013), at 6. Online: CEAA, <<http://www.ceaa-acee.gc.ca/050/documents-eng.cfm?evaluation=63919&type=4>>

³⁵ Carver at 28

³⁶ S. Beltaos, *Numerical modelling of ice-jam flooding on the Peace-Athabasca delta* (2007) *Hydrological Processes*, 21(19)

³⁷ Carver at 27

Threats to PAD from another proposed hydroelectric development on the Peace River

Since the Mikisew Cree submitted their petition, an additional hydroelectric facility has been proposed downstream of Site C on the Peace River. AHP Development Corporation has proposed to construct the Amisk Hydroelectric Project, a 330 megawatt facility comprised of a 24 metre dam, a 30 square kilometre headpond, 15km north of Dunvegan Alberta. This facility would be significantly closer to the PAD, being situated 175 km downstream of Site C.

The proposed Amisk Dam is subject to a provincial and federal environmental assessment process that is, as of May 2, 2016, still in its preliminary stages. The Mikisew Cree are very concerned about the potential effects that this additional facility may have on the flooding mechanisms on which the ecology of the delta depends. This concern is compounded by the approaches of the Amisk proponent and the federal and provincial environmental assessments agencies to the assessment of project effects. To date, neither the proponent nor those agencies has shared information with Mikisew Cree which sets out the potential effects of the project on the delta. Moreover, the project description drafted by the proponent, which sets out some preliminary findings on the potential range of environmental effects of the project, does not consider the well-researched ways in which upstream hydroelectric development has impacted the flooding mechanisms in the delta. Nonetheless, the federal environmental assessment agency has advised the proponent that the Mikisew Cree are likely to be “less affected”, by the project and has directed that the company only needs to consult with the Mikisew Cree on the “low end of the consultation spectrum.” The concern of the Mikisew Cree, expressed to the Crown, is that this environmental assessment will fail to adequately consider the potential effect of upstream hydroelectric development on the delta.

Recommendations

The World Heritage Committee’s Operational Guidelines recognize the need to protect World Heritage Sites from incompatible and harmful activities beyond their boundaries. The serious threats presented by the existing and proposed hydroelectric dams on the Peace River, oil sands development in the Athabasca region, and climate change are examples of such activities. They illustrate the failure of provincial and national governments to account for the significance of the Peace Athabasca Delta and the trans-boundary effects of their legislative and regulatory decisions. This is contrary to the States Parties’ commitments to ensure that World Heritage sites are adequately managed and protected against development and change that might affect the Outstanding Universal Values of a World Heritage site. This failure to protect the PAD from the adverse effects caused by hydroelectric dams, oil sands development, and

climate change seriously threatens the ecological integrity and the Outstanding Universal Values of Wood Buffalo National Park.

We, the Sierra Club BC, would like to urge the Mission to declare Wood Buffalo National Park a World Heritage Site in Danger. We would recommend that the mission look closely at the following recommendations when making their own assessment of the situation:

- Recognition that PAD is threatened because of negative environmental impacts happening outside the Park and corrective actions should be taken;
- Recognition that Site C would likely have significant negative environmental impacts on the PAD;
- Recognition that the scope of environmental assessment for Site C was inadequate, and a recommendation that the state party immediately halt construction of Site C and conduct a full environmental assessment of Site C that includes Outstanding Universal Values of the PAD
- Improvements to the flow regulation regimes of the Peace and Athabasca River to keep recharging the PAD
- Requirement that Alberta and Canada develop a monitoring program with indigenous groups specifically focused on ensuring that the conditions needed to maintain the PAD are maintained



Bob Peart,

Executive Director

Victoria, 12th of May, 2016