



October 27, 2010

The Honourable Tony Clement, MP
Minister of Industry
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Clement,

Re: Elimination of the mandatory census and implications for EIA decision making

The Western and Northern Canada Affiliate (WNC) of the International Association for Impact Assessment (IAIA) is extremely concerned about the proposed changes to Canadian mandatory long-form census. The Affiliate is submitting this letter to emphasize that this will cause numerous problems for those bodies that are responsible for making public interest decisions about major developments. Eliminating the mandatory long-form census is likely to:

- shift the costs of collecting primary socio-economic information to resource developers;
- decrease the accuracy of our understandings of social and economic baseline conditions, especially for smaller communities that have most to lose or gain as a result of development; and,
- ultimately harm the quality of decisions made about major developments,

This would be harmful to both those who undertake major economic developments and to the people likely to be affected by them.

The International Association for Impact Assessment is the predominant professional association for people involved professionally in the practice of Environmental Impact Assessment (EIA), including Socio-Economic Impact Assessment. It is the world's leading organization of its kind, with over 1600 members in 120 countries. The Western and Northern Canada Affiliate is active in British Columbia, Alberta, Saskatchewan, Manitoba, the Yukon and Northwest territories. **The goal of EIA is to improve decision making by investigating and considering the consequences of proposed industrial developments.** The Canadian Environmental Assessment Act and similar legislation in most provinces and territories specifically require consideration of potential project effects on both the biophysical environment *and the socio-economic environment*. The ability to assess these effects requires knowledge of existing social and economic conditions in potentially affected communities. To

date, the information from the long form census has been the primary information source used to prepare socio-economic baseline studies. **Losing the data obtained from the long form census will make it substantially more difficult for proponents of major developments to meet the EIA requirements under Canadian law.**

Predicting how a major proposed development will affect people requires a solid understanding of the existing baseline conditions. For those of us who work on the human environment side of impact assessment, the importance of the long-form census in defining baseline conditions and trends across a series of indicators cannot be overestimated. Much of the baseline data about potentially affected communities and regions come from Statistics Canada. For larger and more complex projects, the human environmental impact assessment requires digging deeply into a variety of indicators to assess current conditions and trends in the way people live. This information is then used to help make informed predictions of what additional beneficial or adverse changes a new mine, pipeline, or road may bring. **Long-form census data, in other words, are integral both to the effective and cost-effective practice of environmental impact assessment.**

Individual developers will bear an unfair burden if the mandatory long-form census is eliminated. This will affect those proposing mines, pipelines, oil and gas facilities, roads, bridges, terminals, and any number of other industrial developments that drive the economy. If sufficient socio-economic baseline information is not available from the census, it falls to developers to collect the information needed by decision makers before projects can proceed. The costs and delays associated with baseline data collection on the human environment would likely increase significantly without the mandatory long-form census. **By eliminating the long-form census, government will shift the responsibility of identifying and tracking socio-economic and cultural change on to developers during the approvals processes.**

Without data from the long form census, the potential effects of development on small or remote communities and Aboriginal populations will be near impossible to assess, resulting in these communities bearing more of the social impacts of economic development. For many small or remote communities and Aboriginal populations, the long form census is the only source of information on current social and economic conditions and how these conditions have been changing over time. Without census data, project proponents will be forced to take intrusive measures to seek baseline information from the community, resulting in increased friction between developers and potentially affected communities. This will likely add to the problem of consultation fatigue and **make the EIA process more adversarial for developers and communities.**

The Voluntary Household National Survey is not a statistically acceptable substitute. Statistics Canada expects a much lower response rate to the voluntary survey, resulting in higher sampling errors, particularly for smaller communities. A voluntary survey is also likely to under-represent some of the groups that may be most vulnerable to the impacts of development. Statistics Canada states that although the Voluntary Household National Survey will be useful for some purposes, “it will not, however, provide a level of quality that would

have been achieved through a mandatory long-form census” (source: www.statcan.gc.ca). Similarly, if it falls to developers to track and identify the socio-economic trends and changes formerly done by the mandatory long-form census, it would result in ad-hoc, development-by-development studies. The results are not likely to be as statistically robust or meaningful as the results of a consistently applied long-term mandatory census. The consequence is that **the information on which major project decisions are based will be less credible. The quality of these decisions will therefore suffer over the years.**

For these reasons, IAIA WNC urges the Government of Canada to reconsider its decision to eliminate the mandatory long-form census, and to allow Statistics Canada to continue to collect, analyze and distribute the resulting social and economic information that is essential for managing the effects of economic development in Canada. The quality and extent of socio-economic information from the mandatory long-form census has been key to understanding and managing the potential impacts of major projects on people and communities. Without this information, many Canadian institutions charged with making decisions that are in the public interest will be unable to effectively fulfil their mandate in the future. IAIA WNC notes that others have voiced similar concerns for other reasons, indicating that government and business both need this data to add value to the Canadian people and the Canadian economy. We urge the federal government to consider these implications and to keep the mandatory long-form census.

Sincerely,



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