GRAND RIVERKEEPER LABRADOR INC.

Dear Honourable Prime Minister Mark Carney, Honourable Premier Tony Wakeham, Honourable MHAs and MPs, the 3 Man Committee reviewing the MOU, Chris Huskilson, Chair, Dr. Guy Holburn and Michael Wilson, and the Impact Assessment Agency of Canada:

We write today as a group of concerned Organizations and Individuals to strongly urge that both branches of government undertake a comprehensive environmental assessment under the Impact Assessment Act, for the proposed Gull Island dam and reservoir and the other related projects listed in the Memorandum of Understanding currently under review by the Three Man Committee. We also strongly urge Governments to consult with concerned citizens, Indigenous Groups and Environmental Groups and that funding be set aside to allow them to have "meaningful" involvement in the process, which is the cornerstone of the Impact Assessment Act. EG: (*the requirement for early, ongoing, and meaningful engagement designed to ensure that public input influences project design and decision-making;)* and as stated in several pages of their review by the Joint Panel reviewing the "Lower Churchill Project, we too are adamant that a proper assessment of the Gull Island dam and reservoir has not been done! We are also adamant that as relates to environmental issues, not many of the recommendations and concerns of the local citizens, groups and Indigenous Peoples were truly and meaningfully considered. In our opinion, the words "meaningful" and "consultation" were mostly disregarded by Nalcor and the Provincial and Federal Governments with regards to this project.

Quoted from the Executive Summary of the Joint Panel Report (2011)

> *For the purposes of this review, the Panel did not accept that developing the hydroelectric potential of the lower Churchill River was a "need", and that therefore the Project should be compared to reasonable alternatives that address the future demand for electricity, and deliver a renewable energy future and long-term revenues for the Province.* (Italics added by GRK)

We at GRK totally agree and will be outlining in our longer submission on March 1st, a few "alternatives that address the future demand for electricity", and that will, we believe, deliver a renewable energy future and more sustainable long-term revenues for the Province.

Further along in the Executive Summary, the Panel states,

> *In light of the separate sanction decisions, the Panel considered the Project as a whole and as separate generating facilities. The Panel questioned whether the Project would be the best alternative to meet domestic demand and whether timely transmission access would be available to deliver energy to unknown markets.* (Italics added by GRK)

Then,

> *[I]t was uncertain how and when the much larger energy output from Gull Island could be transmitted to markets. Because of this, the Panel Concluded that Nalcor had not demonstrated the justification of the Project as a whole in energy and economic terms, and that there are outstanding questions related to both Muskrat Falls and Gull Island regarding their ability to deliver the projected long-term financial benefits to the Province, even if other sanctioning requirements were met.* (Italics added by GRK)

It is our belief that these "outstanding questions related to both Muskrat Falls and Gull Island regarding their ability to deliver the projected long-term financial benefits to the Province" remain un-answered in the MOU!

We now know that the Panel was right to question Nalcor's assumptions—you need only to review the report of Judge LeBlanc of the Inquiry into Muskrat Falls to understand that—so, how then can the current governments consider that their mandate in the old Canadian Environmental Assessment Act (CEAA) regarding meaningful consultation and environmental impacts has been fulfilled?

Quoting the Joint Panel again from page 268 of their final report:

> Recommendation 16.1 Regionally integrated cumulative effects assessment
>
> *The Panel recommends that, if the Project is approved, the provincial Department of Environment and Conservation, in collaboration with the provincial Department of Labrador and Aboriginal Affairs and other relevant departments, identify regional mechanisms to assess and mitigate the cumulative effect of current and future development in Labrador*. (Italics added by GRK)

As far as we are aware, not much was ever done with regards to these Panel recommendations. Since this assessment was completed and the Panel report was released over 15 years ago, we at GRK have amassed huge numbers of documents and peer-reviewed studies on negative environmental impacts that point clearly to massive hydro projects and to this project directly, and we believe it is imperative that this new information; economic, social, cultural, climatic and certainly environmental, be considered.

Currently, we know of no other entities that are urging governments and the Impact Assessment Agency to move ahead with a proper environmental assessment of these projects other than the signatories to this letter. To be clear, there are proposals within the MOU that have never had even a cursory look at the cumulative impacts on the land, waters, and wildlife in western Labrador and downstream. Nor has any past assessment looked closely at the negative implications of the projects on the climate, except for the blanket statement by Nalcor that, if anything, there will be more precipitation because of climate change, so there are no worries about low water levels. We now know that to be totally wrong as both the Smallwood Reservoir and several reservoirs in Quebec have been very low in the past few years due to the warming climate, as has been clearly outlined by Robert McCullough of McCullough Research (https://www.mresearch.com).

We also have documentation and peer-reviewed studies showing that mega dams across the north are impacting—exacerbating—the warming in the Arctic. That alone should be enough to dictate a new and comprehensive Impact Assessment since our leaders are touting mega hydro as the answer to greenhouse gas emissions and climate change impacts.

NL Hydro and Hydro Quebec have both reported in the media that they consider the Gull Island portion of the Lower Churchill Project to have already had an environmental assessment. We have attached quotes from the Joint Panel Reviewing the "Lower Churchill Project" clearly showing they were anything but convinced that a proper assessment has taken place on the Gull Island portion. We also remind you that the 2011 review is now 15 years old, while some of the baseline data used is as much as 4 to 5 years older—and in that length of time, much has been learned about the severity of the negative impacts of mega hydro projects. This old assessment was not only poorly done because of Nalcor's push to develop only Muskrat Falls; it is also outdated.

We know from media reports that PM Carney has visited the former Liberal government and the new PC government in the past month, strongly promoting these projects as Nation Building projects; that by his government's recent new policies, possible Nation Building Projects get referred by him to the Major Projects Management Offfice (MPMO) for review, and if they determine these projects do indeed qualify, then the projects go directly back to the PM's office for his final approval (basically ignoring the Impact Assessment Act almost entirely or, at best, getting a cursory push through the process to "build, baby build"). Our view is that the MPMO would likely never question a project that the PM has already promoted widely in the media, and we are very skeptical about this seemingly total waste of time and finances by yet another layer of bureaucratic oversight when a project clearly appears to already have the approval of the PM and would then clearly bypass much of what the IAAct would demand of the Proponents. The MPMO appears to us to be nothing more than a smoke screen to make citizens believe there has been oversight. Media Reports

(Facebook Post from John Hogan: Delighted to welcome Prime Minister Mark Carney back to Newfoundland and Labrador (September 8, 2025) https://www.ctvnews.ca/canada/newfoundland-and-labrador/article/carney-meets-with-new-newfoundland-and-labrador-premier-on-ambitious-agenda/https://share.google/3RFkKDPG6daPY2v6P.

Here are just a very few of the issues and impacts we feel are not being addressed properly though the current MOU review.

NATION BUILDING:

The notion, pronounced by various folks, including the Prime Minister, that the Gull Island projects mentioned in the MOU are "Nation Building" projects is, to us, preposterous and seems to be born from Canada's, the Prime Minister's, and the Hydro Industries' wrong-headed green-washing of these mega hydro projects as green energy that will help overcome Canada's dirty Alberta tar sands and other greenhouse gas emissions.

To us, the undersigned, the Nation Building appears to be more about building the Nation of Quebec, rather than the Nation of Canada.

Methane emissions from Dams:

New Information from Mark Easter, Chief Scientist at Tell The Dam Truth; Cradle to Grave, life cycle analysis: Methane (CH4) tends to be the biggest source of greenhouse gas from dams and reservoirs, although other gases contribute. Methane is up to 80 times more destructive to atmospheric warming than CO2.

New models now exist to measure these emissions from dams. Hydro Quebec used an outdated model called G-Res to look at some of its reservoirs and proclaim that they are clean. However, a new model called ALL RES reassesses dams and reservoirs with cradle-to-grave input and has found that, measured this way, many hydroelectric projects actually have worse emissions than fossil fuel systems. Other types of models measure different parameters: the IPCC Tier 1 Method, or the GeoCARET and RE-Emission, which is Open source software developed to analyze reservoir and catchment characteristics to estimate GHG emissions. None of these models measures the full gamut of emissions from cradle-to-grave as does the All-Res model; therefore, before we can unequivocally state that the emissions from dams such as those on the Grand (a.k.a. Churchill) River in Labrador are the most efficient energy to help us reduce overall national emissions, we need to ensure the newest and best models/technology are used.

All these models, and especially the All-Res, are crucial considering the speed with which warming is happening in the Arctic because, as we know, what happens in the Arctic impacts the entire globe.

Why, then, are we not seriously looking at some of these newer and more comprehensive methods to ensure we are making the best choices?

As stated by the folks at Tell the Dam Truth and Mark Easter, their chief scientist, Life Cycle greenhouse gas emissions analysis of hydropower systems show their emissions are comparable to fossil fuel-based energy systems. We agree based on our years of research and based on the available science.

We are playing with our future and that of our children if we ignore the newest technology available! https://drive.google.com/file/d/1g_rrnkPBnG4-PiiecSyvRaohEreo6_fZ/view?usp=drive_link

https://www.nature.com/articles/s41561-021-00715-2

<u>Sediment captured behind the dams</u>:

These sediments contain nutrients and silica that aquatic species need downstream: No nutrients in the estuaries equates to no fish. Silica is needed by diatoms. Diatoms are responsible for around 45% of global primary production yet represent only 1% of Earth's photosynthetic biomass. Through photosynthesis, diatoms remove carbon dioxide (co2) from the atmosphere and release oxygen (H2O).

.https://pmc.ncbi.nlm.nih.gov/articles/PMC5516106/#:~:text=Microscopic%20photosynthetic%20plankton%20(phytoplankton)%20provide,photosynthetically%20active%2C%20unlike%20multicellular%20plants.

Diatoms provide between 20 and 50 % of all the oxygen we breathe on earth. They have been called the "Lungs of the Earth."

https://pmc.ncbi.nlm.nih.gov/articles/PMC5516106/

Diatoms are disappearing at an alarming rate. According to a 15-year study by NASA, diatoms have been declining at a rate of 1% per year from 1998 to 2012. https://svs.gsfc.nasa.gov/11934

Sediment trapping behind dams is a major driver of reduced silica delivery to coastal areas, which in turn causes a significant decline in diatom species, altering estuarine ecosystems. Dams act as traps for nutrient-rich sediments (including particulate silica), and the slowed water flow in reservoirs encourages diatoms to grow and settle upstream, reducing the amount of dissolved silica (DSi) that reaches the estuary (with certainty, contributing to that 1% loss reported by NASA).

But it's not only silica that is trapped behind the dams; so are huge amounts of nutrients in that same sediment—nutrients that never reach the estuaries, which are the most

productive areas for marine fisheries. Think cod fish. Think Hamilton Banks in Lake Melville, where fisherpeople said the cod fish virtually disappeared only one year after the Churchill Falls project came on stream in the early 1970s (Carpathian Journal of Earth and Environmental Sciences).

Based on the huge numbers of major dams in the Northern Hemisphere, (Canada and Russia specifically), we ask:

Why are we not considering our contribution to this phenomenon? Why are we not looking at the cumulative effects of one more major dam as a contributor to greenhouse gas emissions, and the loss of diatoms as well as the loss of fisheries regionally and globally? Why wouldn't these issues impact the fisheries in the St. Lawrence River and the Gulf of Maine, considering the path of the currents affecting those areas and the numbers of massive dams emptying into the St. Lawrence?

The original, poorly constructed Environmental Impact Statement and the eventual and totally predictable incomplete environmental assessment did not consider these issues, and, as noted in the Joint Panel report as well as the Inquiry into the Muskrat Falls fiasco, Nalcor and past governments glossed over these impacts or ignored them completely as they maintained the false need and justification for the projects.

Now is the time to assess the real and ongoing negative impacts to our environment and climate change along with the economic reviews, before moving one step further into the climate and environmental abyss. It is in the interest of fair assessments, proper consultation, and near-term and long-term impacts on future generations that we, the undersigned signatories, implore you to act.

We need to own our contribution to these global issues and determine whether alternatives exist that are less destructive. <u>We need a full, comprehensive environmental assessment of the projects contained in the MOU!</u>

Thank you for considering this request before moving forward with any other mega hydro projects in Labrador.

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Attachment:

Preview YouTube video PM Mark Carney Meets with N.L. Premier Tony Wakeham – November 26, 2025