I wish to offer the following suggestion regarding the process for the revision of the Open Burning Smoke Control Regulation.

I am gratified to know that the Regulation is being revised – obviously the Ministry of Environment recognizes the need to reduce the amount of slash burning.

There are several health problems related to air quality in Smithers. Air quality has not met a minimum CCME standard for health in the past two years according to the BC Lung Association Annual Reports *. See also comments from Dr. Bastian of Smithers below **. Both punctuate the need to improve our air quality. Open burning is not the only cause, but there is no doubt that it is a major contributor to our poor air quality.

The horrendous situation created by PIR's massive slash burn on Oct 20 south of Telkwa is but an example. (Hourly average PM-2.5 was < 10ug/M3 for 9 hours and as high as 48 for 2 hrs. The smoke was so bad it literally blocked off the sun).

Our Government needs to acknowledge that the health of British Columbians can and should take a priority over profits. We are painfully familiar with the message "don't get in the way of big business" that emanates from Victoria.

The BC Government can solve the problem by imposing a surcharge on slash burning within the Open Burning Smoke Control Regulation. A revenue-neutral / progressive tax could be used towards treating/preventing lung disease (e.g. COPD). I would also suggest phasing in the surcharge over a fixed period to give the industry an oppOBSCR@gov.bc.caortunity to adjust without suffering financially.

The industry will complain at first (as they did for example, when we phased out beehive burners) but then they will accept it and figure out how to reduce slash burn volumes in an economical way.

In addition, there are ways to make the surcharge more attractive to industry by providing incentives for not burning. For example, allowing a discount toward the surcharge for site chipping or leaving coarse woody debris dispersed on site in low-risk areas. I'm sure there would be other creative ideas to ease the implementation of the surcharge.

I assume that any revisions to the OBSCR can be done without negotiation but rather simply by the Government with the interest of human health as a priority.

Thank you for the opportunity to contribute my thoughts to this process.

Jim Senka Smithers, BC *BC Lung Association State of the Air Report

https://bc.lung.ca/sites/default/files/media/State%20of%20the%20Air%202016%20-%20merg ed_1%20final.pdf

** Comments from Dr. Biz Bastian -

" It is statistically true that cancer rates in the north are higher than elsewhere in BCcancer rates in Smithers are high – the last time we counted there were 57 people being actively treated in our cancer services.

We have much asthma and COPD and we are seeing COPD in people who have never smoked but have lived in Smithers air most of their lives.

High pm2.5 and 10 has an even bigger impact on cardiovascular health, leading to inflammation of blood vessel walls and clot formation (heart attack) and arrythmias. We also now know exposure impacts our immune system leading to autoimmune problems and increased rates of chronic disease. Not healthy stuff to breathe!"

Ray Chipeniuk: That still leaves a lot of tops, branches and punky wood in the burnpiles, so I still agree with you that some sort of "polluter-pays" kind of tax is needed, along with the incentives we discussed for good practices (wildlife piles, chipping piles or other innovative ideas which industry can devise).