

Apr. 26, 2023

Hon. George Heyman,
Minister of Environment and Climate Change Strategy
Room 112 Parliament Buildings
Victoria, BC V8V 1X4
ENV.Minister@gov.bc.ca

Re: Request for Suspension of Drax's Pellet Plant Permit under the Environmental Management Act

Dear Minister Heyman,

We, the signatories of this letter, request that you suspend Drax's wood pellet plant permit under section 18(3)(e) of the Environmental Management Act on the basis of misrepresentation by the proponent during its permit application.

The project turned out to be substantially different from what was presented during public consultation, notably the public, inclusive of Smithers Town Council, being misled on what constituted the primary source of raw material for the facility.

When Northern Engineered Wood Products, the original pellet mill proponent, applied for an amended permit it clearly stated that the primary source material for its proposed plant would be slash or wood waste gathered from logging operations. Using this slash, the company claimed, would result in significant reductions in slash-burning, which is the major source of pollutants in the Bulkley Valley airshed.

However, since commencing operations in 2018, the pellet plant has used whole logs as one of its most important primary sources for wood fibre and there has been no demonstrable reduction in slash-burning, which continues to be a matter of serious concern for public health and safety.

Air pollution is an especially serious problem in the Bulkley Valley region, where communities like Smithers often experience levels of particulate matter that far exceed the recommended levels (<https://www.interior-news.com/news/province-to-focus-on-airshed-emissions/>). NewPro's Public Presentation and Tour: Plant Conversion Project (9-11 July 2015) stated that the pellet plant "will help reduce debris burning", which it acknowledged as the largest source of PM2.5 emissions in the area.

With still over 20,000 slash piles being burned every fall within the Bulkley-Nechako airshed where 3 wood pellet plants currently operate, persistent smoke continues to affect human health, quality of life and economics (amenity migration & tourism for examples).

Northern Engineered Wood Products Inc. (NewPro) applied for an amendment to its permit under s. 16(1)(b) of the *EMA* to turn its Smithers particleboard plant, which was temporarily shut down, into a wood pellet plant. The plant would produce wood pellets to be shipped overseas and used as biofuel. As part of the permit amendment application process, NewPro's presentations claimed that turning the plant into a wood pellet facility would lead to cleaner air in the Bulkley Valley region, as the new plant would produce less emissions than the particleboard plant had. Additionally, NewPro's presentation claimed that the pellet plant would use slash and sawmill waste to produce its pellets, which would save the slash from being openly burned in the forests and contributing to poor air quality. Smithers Town Council and many residents supported the proposal based on the understanding that a substantial reduction of open burning of slash

piles would result and that the pellet plant would have state-of-the-art technology for smoke emission control.

In addition, public support for the permit amendment was partially based on the fact that VOCs (volatile organic compounds), such as formaldehyde resin off-gassing associated with particleboard manufacturing, would no longer be associated with the plant conversion to wood pellet manufacturing, due to the concern of previous brain cancer incidences in proximity downwind of the particleboard plant.

Analysis of PM2.5 in the town of Smithers, conducted by Bulkley Valley Clean Air Now, shows that air quality improvement related to smoke, some 20% since 2019, after wood pellet plant start-up in Nov. 29, 2018, is not contributed to any reduction of slash pile burning since the reduction is also witnessed during the winter months when slash piles are not being burnt. These decreases are likely attributed to better compliance with industrial venting indices, woodstove replacement program and general warming of our winters with less inversions.

We request that you use your authority, as Minister, to suspend the mill's permit since the permit was granted on the grounds that it would help to bring an end to the single-worst source of air pollution in the Bulkley Valley.

We further request that while the permit is suspended the company be required to fully disclose all its wood fibre supply sources by type and by volume. This includes all whole logs, any and all slash conveyed from logging operations to the pellet plant, and all sawmill waste. In addition, we ask you to instruct the company to provide proof of how many slash piles were not burned as a result of its operations.

Lastly, we ask you to amend the Environmental Management Act so that it is clear that if a company makes material misrepresentations during a permit amendment application, it will result in the cancellation of the permit and the proposed project being subject to a full environmental review.

Sincerely,



Len Vanderstar, Director – BV Clean Air Now
len.vanderstar1761@citywest.ca



Michelle Connolly, Conservation North
Michelle.Connolly@alumni.unbc.ca

Cc:
Hon. David Eby, Premier of B.C.
Hon. Nathan Cullen, M.P.
Gladys Atrill, Mayor of Smithers