



Aamjiwnaang First Nation

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Aamjiwnaang First Nation submits the following for the Ministry of the Environment's consideration:

1. The proposed Project may infringe Aamjiwnaang's Aboriginal and treaty rights. Aamjiwnaang continues to assert treaty rights in the area which the project is proposed. At the present time the effects of the proposed project to Aamjiwnaang's aboriginal and treaty rights are the subject of consultation with INEOS Styrenics Ltd., and MOE as full effects of the project are unknown.
2. At this stage of the proceedings Aamjiwnaang First Nation wishes to indicate our request to be included in full consultation with the Environmental Agencies and Departments assessing and approving this request for Environmental Compliance Approval (project type: air) - EPA Part II.1.
3. Aamjiwnaang First Nation's aboriginal and treaty rights are *sui generis* and no other party or consultant or applicant in this proceeding could provide the perspective that Aamjiwnaang has with respect to the existence, nature and scope of those rights, the effect of the Project on those rights, the manner in which consultations concerning those rights have been undertaken, and the appropriate way those rights can be accommodated.
4. We also submit that the project is a concern to our community as cumulative environmental air pollutants' released into the already stressed Sarnia airshed, continues to impact the overall health of our First Nation community. MOE initiated the 419 - Sarnia Air initiative and Aamjiwnaang would like to be informed as to how the MOE proposes to meet the objectives of this initiative if the ECA is approved. We trust as indicated in the Ministry of the Environment's Statement of Environmental Values (SEV) the Ministry will apply the following principles when considering this request:

The Ministry adopts an ecosystem approach to environmental protection and resource management. This approach views the ecosystem as composed of air, land, water and living organisms, including humans, and the interactions among them.

The Ministry considers the cumulative effects on the environment; the interdependence of air, land, water and living organisms; and the relationships among the environment, the economy and society.

The Ministry considers the effects of its decisions on current and future generations, consistent with sustainable development principles.

The Ministry uses a precautionary, science-based approach in its decision-making to protect human health and the environment.

The Ministry's environmental protection strategy will place priority on preventing pollution and minimizing the creation of pollutants that can adversely affect the environment.

The Ministry endeavours to have the perpetrator of pollution pay for the cost of clean up and rehabilitation consistent with the polluter pays principle.

In the event that significant environmental harm is caused, the Ministry will work to ensure that the environment is rehabilitated to the extent feasible.

Planning and management for environmental protection should strive for continuous improvement and effectiveness through adaptive management.

The Ministry supports and promotes a range of tools that encourage environmental protection and sustainability (e.g. stewardship, outreach, education).

The Ministry will encourage increased transparency, timely reporting and enhanced ongoing engagement with the public as part of environmental decision making.