

To the Standing Committee hearing comments on Bill S-6,

Firstly, I would like to commend the legislative drafters for basing the majority of this bill around recommendations that were put forth during the 5 year review process. The 5 year review process was laid out in the Umbrella Final Agreement (UFA) to ensure that our Yukon made environmental assessment process was fulfilling the purpose, objectives and principles that the UFA envisioned. The legacy of land claims in the Yukon, is a story that is still unfolding, but it commenced with a vision and unity of very strong First Nation leaders from across the territory. Here in Yukon, we still stand "Together Today for our Children Tomorrow."

My comments echo the concerns brought forward by many of our First Nations and CYFN. I was involved in the consultation process last year as a Lands Manager for one of the unsigned First Nations, and was therefore privy to the process undertaken by the Federal Government. My colleagues and I were disappointed that during many of the meetings, documents were provided only at the 11<sup>th</sup> hour and our team worked very hard to provide detailed and thoughtful feedback. Our comments and concerns about the legislation were raised very early in the process last year.

- 1) Giving the Federal minister, binding policy-making authority over YESAB undermines the arm's length body responsible for providing an objective and science based environmental assessment. This is an unacceptable centralization of power over a region that is unique and requires local perspective.
- 2) Giving the Federal minister authority to pass power to a minister from Yukon Government undermines the important role and responsibility that the Federal Government has in upholding treaty and Aboriginal rights as determined in section 35 of our Constitution.
- 3) Enforcing further deadlines on the YESAA process is unnecessary, as there are already deadlines that work very well. Universal deadlines will undermine a thorough environmental assessment process and put undue pressures on certain First Nation lands departments that are still working to build capacity.
- 4) First Nations should be equal partners in determining which projects should be up for reassessment or exempt. Our Northern territory is currently undergoing rapid climate change that is impacting our hydrologic cycle, permafrost and many other factors that will affect infrastructure. Reassessing projects will allow us to adaptively manage these changes and hopefully allow us to avoid catastrophic failures of important structures such as dams and roads.

Thank you very much for taking the time to come to Whitehorse and hear our comments,



Sarah Newton  
9-100 Lewes Blvd  
Whitehorse Yukon