



Our File No. 2021-02-01

21 October 2021

City of Prince George
Mayor, Council and Staff
1100 Patricia Boulevard
Prince George, BC
V2L 3V9

VIA EMAIL:

- Mayor Lyn Hall <mayor@princegeorge.ca>;
- Corporate Officer in Legislative Services Division <cityclerk@princegeorge.ca>;
- Councillor Frank Everitt <frank.everitt@princegeorge.ca>;
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Dear Mayor, Council, and staff of the City of Prince George:

**RE: JURISDICTION OF LOCAL GOVERNMENTS TO OPPOSE THE PROPOSED WEST COAST OLEFINS LTD.
PETROCHEMICAL COMPLEX**

We write on behalf of our clients, Too Close 2 Home, a Prince George community group that is concerned about West Coast Olefins' Proposed petrochemical complex. Our clients appeared before Prince George Council on September 20, 2021 to request that Council pass a resolution supporting the Environmental Law Centre's request¹ to the Province with regards to a more comprehensive environmental assessment of the petrochemical complex proposed by West Coast Olefins Ltd (WCOL). Our clients also requested that the Prince George Council hold a town hall or gauge public opinion in some other manner.

¹ This request is outlined in the Environmental Law Centre's recent submission to Honourable George Heyman (Minister of Environment and Climate Change Strategy) and Elenore Arend (Chief Executive Assessment Officer/Executive Director, Environmental Assessment Office), see: Environmental Law Centre, "RE: Request to Refer the Environmental Assessment of the Proposed West Coast Olefins Ltd. Ethylene Project in Prince George and Associated Projects to an Independent Panel of Experts to Conduct a Regional Assessment by Way of Public Hearings" (2021 August 25), online: <<https://elc.uvic.ca/wordpress/wp-content/uploads/2021/08/2021Aug25-Ethylene-Project-Regional-Assessment-Request-LTR.pdf>>.

In response, Prince George councillors expressed concerns about their jurisdiction related to our clients' request. In response, we have prepared a memo demonstrating that local governments have jurisdiction to gauge community opinion on a matter through a town hall or another method. We also demonstrate that local governments have the jurisdiction to make a request that the Minister of Environment and Climate Change Strategy establish a regional environmental assessment with a panel of independent experts and public hearings. Finally, we demonstrate that local governments have the jurisdiction to state outright opposition to a project, if they see fit.

We understand there has been a media release from the proponent, WCOL, expressing their intention to withdraw from the provincial Environmental Assessment process for the Ethylene Plant² and that they still intend to proceed with the NGL Recovery Project.³ However, pending confirmation of that, we believe that the attached memo will be useful to you, in dealing with the petrochemical proposal(s), either now or in the future. In addition, the legal memo may be useful when similar issues arise in Prince George in the future.

Therefore we submit the attached legal opinion for your consideration.

Sincerely,



Calvin Sandborn, QC, Barrister and Solicitor

"Yomi Wong"

Yomi Wong, JD Student

"Christa Croos"

Christa Croos, Articled Student

² Brendan Lawliw, "West Coast Olefins scraps 5.6 Billion Dollar petrochemical plant in PG" (2021 October 21) *MyPGNow*, online: <<https://www.myprincegeorgenow.com/149671/west-coast-olefins-scraps-5-6-billion-dollar-petrochemical-plant-in-pg/>>.

³ West Coast Olefins, "Prince George NGL Recovery Project", online: <<https://www.westcoastolefins.com/pg-ngl-recovery-plant>>.



To: Mayor, Council, and Staff of City of Prince George

From: Calvin Sandborn, QC; Yomi Wong, law student; Christa Croos, Articled Student

Re: Jurisdiction of Local Governments to Take Actions Regarding the West Coast Olefins Ltd. Petrochemical Complex (Our File No. 2021-02-01)

Date: October 21, 2021

Issues

This memo is filed on behalf of Too Close 2 Home to address the issue of whether the City of Prince George has the jurisdiction:

1. To hold a town hall meeting or hearing relating to the three petrochemical plants (“**the Petrochemical Complex**”) proposed by West Coast Olefins Ltd. (“**WCOL**”), in order to gauge public opinion¹;
2. To pass a resolution requesting that the Minister of Environment and Climate Change Strategy refer the Petrochemical Complex for a regional environmental assessment by way of an independent panel of experts holding public hearings (as requested in the ELC submission to Minister of Environment and Climate Change Strategy George Heyman on August 25, 2021)²; and
3. To pass a resolution stating municipal opposition to the Petrochemical Complex.

Brief Answer

The Prince George Council has clear legal authority to hold a town hall meeting or hearing to gauge public opinion about the Petrochemical Complex. The Council also has the jurisdiction to pass a resolution calling for a more comprehensive environmental assessment, as per the ELC request to Minister Heyman. Additionally Council has the jurisdiction to pass a resolution stating the City’s opposition to the Petrochemical Complex, if they see fit.

Numerous BC local governments have established precedent for such actions, by passing similar motions/resolutions that are political and persuasive in nature and do not legally bind other orders of

¹ See the August 25, 2021 ELC submission to Minister of Environment and Climate Change Strategy George Hyman cited in the following footnote for a description of the three specific petrochemical plants. Note that the polyethylene plant would be integrated with the other plants, but potentially operated by a different company.

² This request is outlined in the Environmental Law Centre’s recent submission to Honourable George Heyman (Minister of Environment and Climate Change Strategy) and Elenore Arend (Chief Executive Assessment Officer/Executive Director, Environmental Assessment Office), see: Environmental Law Centre, “RE: Request to Refer the Environmental Assessment of the Proposed West Coast Olefins Ltd. Ethylene Project in Prince George and Associated Projects to an Independent Panel of Experts to Conduct a Regional Assessment by Way of Public Hearings” (2021 August 25), online: <<https://elc.uvic.ca/wordpress/wp-content/uploads/2021/08/2021Aug25-Ethylene-Project-Regional-Assessment-Request-LTR.pdf>>.

government. For example, resolutions calling for more comprehensive provincial environmental assessments have been issued by the councils/board of Comox Valley Regional District, the Village of Cumberland, the Town of Comox, and the City of Courtenay, in relation to the proposed Raven Coal Mine. Kamloops City Council passed a motion formally expressing the City's opposition to the proposed KGHM Ajax Mine. The Kamloops City Council motion followed a town hall meeting convened by the City to solicit citizen viewpoints on the project. Statutory provisions and precedents confirm the jurisdiction of local governments to take all the above actions.

General Jurisdiction of Local Governments

Deference to Municipal Actions

Despite municipal powers being found in enabling statutes, BC legislation and judicial interpretation by the Supreme Court of Canada provides for a broad and purposive interpretation of municipal powers, thereby giving local governments a great deal of flexibility in fulfilling their statutory purposes.³ Decisions of local governments are to be given a great deal of deference.⁴

The purpose of both the *Local Government Act* and the *Community Charter*,⁵ which delegate provincial authority to local governments, are "to provide local governments with the flexibility to respond to the different needs and changing circumstances of their communities."⁶ The *Community Charter* specifically calls for municipal powers to be interpreted broadly in accordance with the above two statutes and municipal purposes generally.⁷

The Province Delegates Authority to Local Governments

Provinces may delegate their powers to local governments, either expressly or by implication.⁸ The province has the jurisdiction to regulate in the areas of environmental protection, public health, and the governance of businesses.⁹ Aspects of these powers can, and have been, delegated to local governments.

The *Local Government Act* explicitly confers broad powers upon local governments in s. 294, which states that "a board has all necessary power to do anything incidental or conducive to the exercise or performance of any power, duty or functions conferred on a board or regional district by any enactment." Local governments further have the power to "provide assistance for the purpose of benefitting the community or any aspect of the community."¹⁰ Provincial legislation recognizes that

³ *Interpretation Act*, RSBC 1996, c 238, s. 8; *United Taxi Drivers' Fellowship of Southern Alberta v. Calgary (City)*, 2004 SCC 19 at para 6.

⁴ The degree of deference is such that for a court to overturn a decision of a local government, the government must have come to a clearly irrational decision – such as by exercising its power arbitrarily or in bad faith. Thus, the appropriate standard of review for determining whether their actions are *intra vires*, or within proper jurisdiction, is patent unreasonableness. - *Nanaimo (City) v. Rascal Trucking Ltd.*, 2000 SCC 13.

⁵ *Local Government Act*, RSBC 2015, c 1 [*Local Government Act*]; *Community Charter*, SBC 2003, c 26 [*Community Charter*].

⁶ *Local Government Act*, s. 1(c); *Community Charter*, s. 3(c).

⁷ *Community Charter*, s. 4; Buholzer p. 14.

⁸ Local governments have extensive implied powers, which may arise in two ways; 1) by natural implication from a grant of express power, or 2) by logical inference from the purposes and functions of the municipality. - Ian MacFee Rogers Q.C., *Canadian Municipal Corporations*, 2nd ed (Toronto, Carswell 1988) at § 8:27 ("**Canadian Municipal Corporations**").

⁹ *Constitution Act 1867*, s. 92(7) and (8), s. 92(13).

¹⁰ *Local Government Act*, s. 263(1)(c). These powers may be exercised outside the boundaries of the regional district. – s. 263(3).

municipalities require “adequate powers and discretion to address existing and future community needs.”¹¹

Council Has Jurisdiction to Gauge Public Opinion through a Town Hall, Hearing, or Other Means

Municipal council has the discretionary power to seek the opinion of their constituents by voting or ‘another process’. This authority is provided for in section 83 of the *Community Charter*:

*(1) A council may seek community opinion on a question that the council believes affects the municipality, by voting or any other process the council considers appropriate.*¹²

The terms “another process” and “any other process” are sufficiently broad to encompass town halls and hearings. The question of whether the Petrochemical Complex would lead to serious and irreversible harms to the health, welfare, and safety of local residents and the environment, as well as foreclose more sustainable economic opportunities, is one that clearly affects the City. The Prince George City Council thus has express powers to hold a town hall meeting or hearing about the Petrochemical Complex. It is important to note that the results of these processes are not binding on councils.¹³

Statutorily-mandated public hearings involving environmental issues require special procedural considerations.¹⁴ A municipality must disclose as much information as possible to allow citizens to voice their opinions in an informed manner.¹⁵ On the other hand, town halls have less stringent requirements than public hearings, as it is an undefined term in the *Local Government Act* and the *Community Charter*.

In practice, the Kamloops City Council held a town hall meeting collecting questions to be investigated by its independent review of the proposed Ajax Mine,¹⁶ which the city ultimately opposed. Using a somewhat different process of gauging community opinion, the District of Kitimat held a non-binding plebiscite on the Northern Gateway project, to measure community opinion on the controversial Northern Gateway Pipeline project.¹⁷ Both examples demonstrate that local governments have express jurisdiction to gauge public opinion through flexible means.

Council has Jurisdiction to Request a More Comprehensive Provincial Environmental Assessment for the Petrochemical Complex

The Council has jurisdiction to pass a resolution requesting that the Province conduct a regional

¹¹ *Community Charter*, s. 1(2)(a). Also: Where the legislature has granted a discretionary power to a local government and has neither designated nor restricted the means to carry such power into effect, the council has the right to utilize whatever lawful means it wishes - *Canadian Municipal Corporations*, § 8:69.

¹² Emphasis added.

¹³ *Local Government Act*, s. 293(3); *Community Charter*, s. 83(2).

¹⁴ Municipalities must ensure that all vital information is disseminated at the public hearing. - *Norman v. Port Moody (City)*, [1995] B.C.J. No. 2695.

¹⁵ The duty of procedural fairness requires impact reports and other relevant documents to be made available prior to a statutorily mandated public hearing. - *Pitt Polder Preservation Society v. Pitt Meadows (District)*, 2000 BCCA 415.

¹⁶ CBC Radio, “City of Kamloops Town Hall on Ajax” (2015), online: <<https://www.cbc.ca/player/play/2676315365>>.

¹⁷ See the January 6, 2014 Minutes of District of Kitimat Council, which established the plebiscite, by passing a motion “THAT the District of Kitimat conduct a plebiscite (a non-binding form of referendum) at polling stations and with advance polls, regarding Kitimat residents’ opinion on the Enbridge Northern Gateway Project.” See the account of the resulting plebiscite where residents voted no to the project proposal at: CBC News, “Kitimat, B.C., votes ‘no’ to Northern Gateway in plebiscite” (2014 April 12), online: <<https://www.cbc.ca/news/canada/british-columbia/kitimat-b-c-votes-no-to-northern-gateway-in-plebiscite-1.2607877>>.

Environmental Assessment of the petrochemical complex with independent expert panel and public hearings, as requested. It is important to note that such a proposed resolution would be a City request intended to persuade the provincial government. It would not constitute a law that would infringe provincial jurisdiction.

First, note that there are numerous precedents where local governments have requested that the provincial government take specific actions in its environmental assessment of resource projects. Indeed, examples of resolutions remarkably similar to the one requested by our client, Too Close 2 Home, include those issued by the Councils of the Village of Cumberland,¹⁸ the City of Courtenay,¹⁹ the Town of Comox,²⁰ and the Comox Valley Regional District.²¹ For example, the resolution by the Village of Cumberland was passed in order to state local government opposition to the Raven Coal Mine; to call for an Environmental Assessment with public hearings; and to request particular studies be conducted:

...THEREFORE BE IT RESOLVED THAT THE Village of Cumberland advise the elected representatives and the appropriate agencies of the Federal and Provincial governments that it is opposed to the further processing of this application until the Province of British Columbia conduct a comprehensive aquifer mapping of the aquifers that could be affected by the Raven Underground Coal Mine Project; and

THAT THE Province of British Columbia conduct an independent baseline study of the Baynes Sound intertidal and subtidal benthic infauna community adjacent to the proposed Raven Underground Coal Mine Project; and

*THAT the Federal Minister of the Environment refer the environment assessment of the Raven Underground Coal Mine Project to an independent review panel with public hearings...*²²

¹⁸ The Village of Cumberland, "The Corporation of the Village of Cumberland Regular Council Meeting February 25th, 2013 at 5:30 p.m. - Village Council Chambers" (2013) at pp. 9-10, online: <<https://cumberland.ca/wp-content/uploads/2013/02/07.13.R-February-25-2013.docx>>.

¹⁹ "Minutes of a Regular Council Meeting held in the City Hall Council Chambers, Courtenay B.C., on Monday, February 4, 2013 at 4:00 p.m." at pp. 4-5, online: <https://www.courtenay.ca/assets/City~Hall/Council/Minutes/2013/2013-02-04_Council_Minutes.pdf>.

²⁰ Please contact the Town of Comox for the text of this resolution as archived minutes are not publicly available for the years 2012-2013.

²¹ Email Correspondence. "Local government resolutions on Ravel Coal". John Snyder. Received by Calvin Sandborn (2021 September 17).

²² Emphasis added. The Village of Cumberland, "The Corporation of the Village of Cumberland Regular Council Meeting February 25th, 2013 at 5:30 p.m. - Village Council Chambers" (2013) at pp. 9-10, online: <<https://cumberland.ca/wp-content/uploads/2013/02/07.13.R-February-25-2013.docx>>. Additional persuasive examples include: The Vancouver City Council has also unanimously passed a similar resolution to endorse the Treaty on the Prohibition of Nuclear Weapons, calling on the Government of Canada to sign and ratify the treaty. See: City of Vancouver, "REGULAR COUNCIL MEETING MINUTES JUNE 25, 2019" at pp. 19-22, online: <<https://council.vancouver.ca/20190625/documents/regu20190625min.pdf>>. At the time, the Government of Canada had not agreed to the treaty and treaty-making is within their jurisdiction. See: Kenneth Chan, "City of Vancouver could soon have a new policy for nuclear weapons" (2019 July 21) *DH News*, online: <<https://dailyhive.com/vancouver/vancouver-nuclear-weapons-sign>>. The City of Vancouver also recently endorsed the Fossil Fuel Non-Proliferation Treaty and asked that a letter be sent to the Premier of BC and the Prime Minister, urging them to do the same. City of Vancouver, "COUNCIL MEETING MINUTES OCTOBER 6, 13 AND 21, 2020" at pp. 32-34, online: <<https://council.vancouver.ca/20201006/documents/regu20201006min.pdf>>. A similar resolution has been passed in *Toronto (City) v. Metropolitan Toronto (Municipality)* [1992] O.J. No. 2217. There, the court found that the municipality had jurisdiction to pass a resolution, affirmed by bylaw, requesting that the Province establish market value assessment.

Second, while there may be no express statutory authority governing local governments' ability to make requests, courts have endorsed a generous approach to interpreting municipal powers. Courts interpreting local government powers have embraced the deeply influential dissenting judgement²³ of former Chief Justice McLachlin in *Shell Canada Products Ltd. v. Vancouver (City)* ("**Shell**"). She would have upheld the Vancouver Council's resolution, declaring that the city would not do business with South Africa, by generously interpreting municipal powers²⁴:

*Whatever rules of construction [for interpreting laws] are applied, they must not be used to usurp the legitimate role of municipal bodies as community representatives.*²⁵

This judgement was cited by the Supreme Court of Canada in *United Taxi Drivers' Fellowship of Southern Alberta v. Calgary (City)*²⁶ – which supports and affirm legitimate local government involvement in “non-traditional spheres of activity.”²⁷ The non-traditional sphere in question here is that of an environmental assessment of a resource project.

In the current situation, the citizens of Prince George and the citizens of the Regional District of Fraser-Fort George have repeatedly expressed their wishes for a rigorous Environmental Assessment. For example, this was expressed in an online petition with over 400 signatures²⁸ in addition to a paper petition with over 1800 signatures opposing the proposed Natural Gas Liquid Recovery Plant in Pineview.²⁹ To respond to these widespread citizen concerns, Prince George Council would be well within its jurisdiction to pass a resolution to request an expanded Environmental Assessment for the Petrochemical Complex. It bears repeating that the resolution suggested by Too Close 2 Home is intended to be merely persuasive – not to legislate or regulate any matters.

While it is true that local governments have express powers to regulate, prohibit, and impose requirements in relation to matters like (i) public health³⁰; (ii) protection of the natural environment³¹; (iv) protection of farming³²; and (v) the establishment of objectives to promote the reduction of greenhouse gas emissions,³³ the resolution requested by Too Close 2 Home does not propose the local

²³ Buholzer, p. 16.

²⁴ She stated that a broad approach to municipal powers would serve several purposes: (1) ensure that courts respect the democratic responsibility of elected officials, (2) aid the efficient function of local governments and avoid the costs and uncertainty associated with excessive litigation, (3) keeps with the nature of modern municipalities where “municipal councils should be free to define for themselves, as much as possible, the scope of their statutory authority” and (4) a broad, deferential approach to judicial interference in municipal decisions would echo the approach with regards to other administrative agencies. *Shell* at p. 245-7.

²⁵ *Shell Canada Products Ltd. v. Vancouver (City)*, [1994] 1 S.C.R. 231 at p. 244, online:

<<https://www.canlii.org/en/ca/scc/doc/1994/1994canlii115/1994canlii115.pdf>>, emphasis added.

²⁶ 2004 SCC 19 at para 9.

²⁷ Buholzer, p. 17.

²⁸ Too Close 2 Home, “Demand an independent review and public hearings for proposed WCO projects in PG,” online:

<<https://www.change.org/p/honourable-george-heyman-minister-of-environment-and-climate-change-strategy-demand-an-independent-review-public-hearings-for-proposed-wco-projects-in-pg>>.

²⁹ Number of signatures on paper petition as of October 20, 2021. Please contact Too Close 2 Home to obtain most up-to-date numbers.

³⁰ *Local Government Act*, s. 304; *Community Charter*, s. 8(3)(i)

³¹ See: “maintaining sanitary conditions” – *Local Government Act*, s. 304 re; *Community Charter*, s. 8(3)(j)

³² *Local Government Act*, s. 488(1)(c).

³³ *Local Government Act*, s. 488(1)(j).

government regulation of any of these matters.³⁴ Rather, our clients are proposing a politically persuasive, non-binding resolution.

If you pass a non-binding resolution to make a request for an expanded environmental assessment of the petrochemical complex, that could help persuade Minister Heyman to institute a better environmental assessment process. The Minister would recognize that your Council is made up of representatives, speaking on behalf of your constituents, who have clearly and repeatedly expressed their strong desire for a comprehensive assessment of all three plants that make up the Petrochemical complex. What our clients are seeking is political support from your Council, and the listed precedents and case law demonstrate that Prince George City Council is well within its jurisdiction to pass the resolution sought by Too Close 2 Home.

Council Has Jurisdiction to Pass a Motion Opposing the proposed Petrochemical Complex

A local government has the authority to express its policy on issues outside of its legislative competence, “particularly in matters in which it has a very real interest.”³⁵ Council is thus permitted to express their opposition to the Petrochemical Complex, as its development is a matter in which the City of Prince George has a very real interest.

Council has jurisdiction to express their opposition by passing a resolution. Once again, it is important to note that Council’s statement of opposition is not legally binding upon the Province and does not infringe provincial jurisdiction.³⁶

A persuasive precedent for stating outright opposition to a project has been set by Kamloops City Council. After hearing the overwhelming concern of their citizens through public engagement, the City of Kamloops changed its position and asserted its powers to specifically call for rejection of the proposed KHGM Ajax mine. The relevant Council motion read:

*Moved by Councillor Lange, seconded by Councillor Cavers, that Council authorize a letter be sent to the BC Environmental Assessment Office, the Canadian Environmental Assessment Agency, BC’s Minister of Environment, and the federal Minister of Environment and Climate Change by Friday, July 21, 2017, expressing Council’s unequivocal “no” to the proposed KHGM Ajax Mine project and including a list of the reasons for the opposition.*³⁷

Similarly, the Vancouver City Council successfully passed a resolution calling upon the federal government to sign and ratify the international Treaty of the Prohibition of Nuclear Weapons. This resolution was not challenged in court. If it is permissible for a city to state city opposition an international matter, it logically follows that it is permissible, and arguably more appropriate, for Prince

³⁴ *Local Government Act*, ss. 491(1) and (3) outlines that local governments have the additional powers related to development activities as they may be prohibited until a license, permit or approval has been granted,³⁴ in the interests of health, safety, or the protection of property from damage. This power extends to matters not purely of a local nature. - *Canadian Municipal Corporations*, § 8:4. Again, this is not the intention or substance of the resolution proposed by Too Close 2 Home.

³⁵ *Canadian Municipal Corporations*, § 8:26.

³⁶ *Canadian Municipal Corporations*, § 8:26.

³⁷ Municipal Council of the City of Kamloops, “MINUTES of a Special Council Meeting of the MUNICIPAL COUNCIL OF THE CITY OF KAMLOOPS, held in Council Chambers at 7 Victoria Street West, Kamloops, BC, on Monday, July 17, 2017, at 10:30 am.” (2017) at p. 3, online: <<https://kamloops.civicweb.net/document/67329>>. Emphasis added.

George Council to pass a motion of opposition to local projects – as the effects of a local petrochemical complex have far more immediate impacts on constituents. The power to do this is supported by the purposes of the *Local Government Act* and *Community Charter* which provide local governments with the flexibility to respond to the changing needs of their communities, including stating opposition to a project through a resolution.³⁸

Conclusion

The above legislation, case law and precedents definitively demonstrate that the City Council of Prince George has the jurisdiction to:

- Gauge public opinion by hosting a public engagement event such as a town hall or hearing. Doing so would bolster transparency and accountability about a proposed Petrochemical Complex that may produce many harms;
- Issue a resolution requesting that the Province conduct a regional environmental assessment with a panel of independent experts and public hearings; and
- Pass a motion to oppose WCOL's petrochemical complex.

We understand from media reports that WCOL may not continue with two of the proposed plants at this time, and this may change the situation considerably. However, we have not received formal confirmation of that discontinuance of two proposed projects. Therefore, if the proposal for the three plants do continue to go forward (or if they are revived at some point in the future), we call upon your Council to heed the above precedents.

In that case, we would ask you to act on your residents' many calls for public consultation, and conduct a town hall meeting regarding the proposed complex. Hosting a public engagement, like a town hall would serve to address citizen concerns related to worker and residential health, local and global environmental degradation, and the detrimental social impacts arising from the proposed petrochemical complex.

We would also request that you pass a motion supporting the request for a more comprehensive environmental assessment, as outlined by the ELC-Too Close 2 Home August 25 submission to the Minister of Environment.³⁹

Finally, public concern and additional information about the complex may compel Council to also state outright opposition to the Petrochemical Complex by passing a resolution to that effect. Such resolutions may be persuasive to the Province and are clearly within the Council's jurisdiction.

³⁸ *Local Government Act*, s. 1(c); *Community Charter*, s. 3(c).

³⁹ Environmental Law Centre, "RE: Request to Refer the Environmental Assessment of the Proposed West Coast Olefins Ltd. Ethylene Project in Prince George and Associated Projects to an Independent Panel of Experts to Conduct a Regional Assessment by Way of Public Hearings" (2021 August 25), online: <<https://elc.uvic.ca/wordpress/wp-content/uploads/2021/08/2021Aug25-Ethylene-Project-Regional-Assessment-Request-LTR.pdf>>.