

From: [Green Verte](#)
Sent: August 23, 2021 6:57:04 AM
To: [Ministre / Minister \(ECCC\)](#)
Cc: information@iaac-aeic.gc.ca
Subject: Request for Designation of Meltech Project
Sensitivity: Normal
Attachments:
[Request for Designation of Meltech Project.docx](#) ;

The Honourable Jonathan Wilkinson
Minister Environment of and Climate Change Canada

Please find a Request for Designation of a Project attached. Please acknowledge successful receipt.

Gareth Richardson
President
Green Coalition/Coalition Verte



Request for Designation of Meltech Project

1. Introduction

This request for designation of a project under Section 9 of the Impact Assessment Act is submitted on behalf of the Green Coalition/Coalition Verte. The Coalition, founded in 1988, is a Federally and Provincially incorporated not for profit organisation comprising more than 80 citizen groups and over 300 individual members all dedicated to the protection of the environmentⁱ.

The project in question is currently the subject of a Project on Federal Lands Impact Assessment under sections 81 through 91 of the Impact Assessment Act under the authority of the Ministry of Innovation, Science and Economic Development and the Montreal Airport Authority (Aéroports de Montréal). The Green Coalition believe, however, that given the seriousness of the potential impacts as outlined below, that the project warrants a more thorough and independent Impact Assessment under section 9 of the Act.

The request is presented in accordance with the document Operational Guide: Designating a Project under the Impact Assessment Actⁱⁱ.

2. Contact details of Requesting Party

Green Coalition/Coalition Verte
18, avenue de l'Alliance,
Montréal, Qc,
H4K2C6

Email greencoalitionverte@yahoo.ca

Telephone 514 684 7970

3. Statement explaining the request for the Minister to designate a project;

3.1 Description of the project that is the subject of the request,

3.1.1 Project name,

YUL Montreal - Trudeau International Airport – Construction of an industrial building to produce nonwoven fabric for surgical masks.

3.1.2 Proponent name and address

Meltech Innovation Canada Inc.

Medicom Group

2555 Chemin d l'Aviation, Montréal, Québec, Canada. H9P 2Z2

3.1.3 Project location

The north part of lot 5 599 104 located on the Chemin de l'Aviation at YUL Montreal-Trudeau International Airport.



3.1.4 Descriptive information about the project,

Construction of an industrial building of ground surface area approximately 4,000 square meters, situated on a 15,500 square meter lot. The proposed building is intended for the production of nonwoven fabric for surgical mask manufacturing.

3.1.5 Links to relevant documentation

Project documentation including an Ecological Survey is available at the Canadian Impact Assessment Registry.ⁱⁱⁱ

4 Explanation of why the project should be designated, including potential adverse effects that the project may cause.

4.1. The project is in an environmentally sensitive location

The project lot is located on an area of approximately 150 hectares owned by the Government of Canada, currently leased to the Aéroports de Montreal (ADM). The project site lies in a section of the 150 hectares that was formerly part of the adjacent Golf Dorval course but has been unused and allowed to re-wild for several years. As a result of this re-wilding this area has become a significant breeding habitat for the endangered Monarch Butterfly and is known as the Monarch Fields. The threat the proposed project poses to the Monarch has been extensively covered in the media^{iv}.

Together with land located on the Montreal Technoparc to the east, the Government land forms an integral part of Montreal's last large, unprotected, marshland and riverine ecosystem - 200 hectares of rare wildlife habitats - the size of Mount Royal Park. Forests, grasslands, marshes and ponds, vernal pools and streams that flow north to Rivière des prairies and South to the St. Lawrence River shelter an abundance of living species, notably the largest variety of bird species recorded on Montreal Island.

Over the last few decades, all 200 hectares of varied terrains have naturally regenerated, with the result that the contiguous 200-hectare ecosystem is attracting a great variety of wildlife from far and wide. As urban sprawl has replaced habitat throughout the Greater Montreal Region at an accelerated pace over the last 30 years, Montreal's last large unprotected marshland and riverine ecosystem has become a final refuge for many species – insects, reptiles, fish, mammals large and small, as well as many bird species at risk and in serious decline including the following:

Threatened

Least Bittern;
Barn Swallow (Bank Swallow);
Bobolink;
Chimney Swift;
Eastern Meadowlark;
Lesser Yellowlegs;
Whippoorwill;
Wood Thrush;

Of Special Concern

Canada Warbler;
Common Nighthawk;



Eastern Wood Peewee;
Evening Grosbeak;
Olive-sided Flycatcher;
Rusty Blackbird;
Short-eared Owl

Now, these biodiverse species are finding their physical needs met on these 200 hectares, proliferating, thriving, adapting to their chosen niche. The Trophic network or Food Chain of this unique ecosystem is complex and complete, ensuring its long-term viability. From microscopic organisms to macro species like birds and mammals, this is extremely healthy, robust and resilient.

No land where wild species now persist and thrive, even in our cities, can be dismissed as expendable. The linkages between climate change and biodiversity-biomass decline are becoming ever more starkly apparent. We must prioritize the return of damaged lands to a natural state for the sake of both struggling wildlife and vulnerable people. This, both, the ongoing international process at the United Nations and the overwhelming scientific consensus makes clear.

"We need transformational change operating on processes and behaviours at all levels: individual, communities, business, institutions and governments." "We must redefine our way of life and consumption." Among contributors to Earth's shattered equilibrium, are "losses of habitat and resilience" and "overexploitation." These are among the conclusions of a recently released report by the United Nations Intergovernmental Panel on Climate Change (IPCC)^v. Business and institutions mean Medicom, Meltech Innovation and the ADM. The Government of Canada must prioritize and contribute to solutions not exacerbate the problem.

Canada has already lost 90% of its urban wetlands and so has Montreal. Moreover, Montreal, with the lowest tally of natural space conserved per capita among Canadian cities needs the promised help of the federal government to increase its urban parks. There is no better way for the federal government to fulfil the commitment of the Throne Speech of September 23rd, 2020 in Quebec than to create the National Wildlife Area to conserve the federally owned portion of Montreal's last large unprotected wetland ecosystem and then to ensure the protection of the adjacent Technoparc wetlands in turn.

"The pandemic has reminded Canadians of the importance of nature. The Government will work with municipalities as part of a new commitment to expand urban parks, so that everyone has access to green space." ^{vi}

4. 2. New type of activity involved in the project

Since there is currently no facility in Canada for producing non-woven fabric for surgical masks the strategic importance of the proposed facility is clear but it has no relevance to Airport activities and there are many alternative sites in the Dorval – Côte-de-Liesse and other industrial parks of the West-Island. There is thus no compelling reason why this facility need be located on the proposed site with the accompanying highly negative environmental impact.

4.4. Potential adverse effects that are of concern and fall within federal jurisdiction

4.4.1 Effects on fish, fish habitat and aquatic species, as defined in subsection 2(1) of the Species at



Risk Act;

The project site and surrounding areas provide food and nesting sites for migratory birds. The trophic network includes streams that connect to the St. Lawrence River to the South and the Rivière des Prairies to the North. Any construction within it has the potential to alter drainage patterns and increase pollution levels with adverse effects on fish, fish habitat and other aquatic species.

4.4.2 Changes to the environment on federal lands;

Since 2019 the Green Coalition has been appealing to the Government of Canada to help preserve the Government owned 150 hectare portion of the unique 200 hectares natural space to the North of the airport

On December 3rd, 2020 the Honourable Clifford Lincoln, former Environment Minister of Quebec, wrote an open letter^{vii} signed by many prominent community leaders to the federal government in support of the Green Coalition's call for the creation of a National Wildlife Area on this land.

On March 2nd 2021 lawyers for the Coalition sent a letter to the Honourable Jonathan Wilkinson^{viii} regarding at-risk bird species and the creation of a National Wildlife Area and received an encouraging reply on May 3rd 2021^{ix}.

The Green Coalition continues to call on Honourable Ministers Wilkinson, Alghabra (previously Marc Garneau) and Guilbeault for the creation of a National Wildlife Area on this vital section of Montreal's last large unprotected ecosystem.^x

The Agglomeration and City of Montreal have recognised the importance of the area. The Schéma d'aménagement et de développement de l'agglomération de Montréal^{xi} designates the areas of Government of Canada land immediately to the south of the project site as "Grand espaces verts ou récréation" and to the south as "Conservation". Since 2013 the Agglomeration has indicated its desire to include this conservation area, together with a part of the Montreal Technoparc territory, in a new Parc Nature des Sources^{xii} within the Écoterritoire de la coulee verte du Ruisseau Bertrand^{xiii}.

A Declaration adopted by the Montreal City Council on the 19th of April 2021^{xiv} resolved:

"Que la Ville de Montréal enjoigne le gouvernement fédéral à appuyer la conservation du Golf de Dorval ainsi que des lots adjacents qui lui appartiennent, afin de créer une trame verte qui viendrait bonifier le projet du parc-nature des Sources;

Que la Ville de Montréal invite le ministre des Transports fédéral à engager les discussions avec les services de la Ville afin de déterminer les modalités de ce projet de conservation conjoint;

Que la Ville de Montréal reconnaisse l'importance de préserver la vocation d'espaces verts des terrains de golfs situés sur son territoire;"

The Montréal Agglomeration is well below the average for major Canadian cities in the ratio of natural space to population^{xv} thus avoiding further reductions in existing natural infrastructure and the re-wilding of degraded areas are critically important if the city is to be resilient in the face of the ongoing climate and biodiversity crises.

The ecological richness of the area has been recognised by the ADM itself through the designation of 22.7 ha with the Agglomeration conservation zone as the Parc écologique des Sources^{xvi}.

Any further encroachment on and disturbance of these wild and semi-wild areas reduces the diversity and thus the ecological value of all of it.



An Ecological Study of the project site, commissioned by DIVCO, the construction company for the project, is posted on the Canadian Assessment Registry site indicated in paragraph above. Based on this report the ADM claim that “No wetlands, waterways, sensitive species or habitats or protected zones are present on the site” appears strikingly incomplete.

Among other shortcomings of the study, bird surveys are incomplete and wetland-indicator species have not been thoroughly documented. In addition the report refers to the vital wild-space of the Monarch Fields as a “wasteland”, an unscientific and pejorative term implying that land not built or otherwise modified by man is wasted.

The study recognizes the presence of Milkweed on the site but attempts to minimise its importance as part of a Monarch breeding ground because it is not a recognised staging ground and the fact that, despite the COSEWIC designation^{xvii}, the Monarch is not formally recognised as endangered by either Federal or Provincial authorities. Observations at more appropriate times of the year would have shown the presence of a large breeding population.

3.4.6 Changes to the environment that occur outside of Canada;

There is potential to impact the number of Monarch butterflies migrating from Canada to California and Mexico the migration of birds to and from countries all the way to Central America.

3.4.7 Changes to the environment that could affect the Indigenous peoples of Canada;

The site is on unceded territory of the Kanien'keha:ka (Mohawk) nation.

5. Potential to cause adverse effects that are directly related or incidental to a federal authority

5.1 Making a decision that would permit the carrying out, of the project

The ADM and the Ministry of Innovation, Science and Economic Development who are conducting the current Impact Assessment on the project are Federal Authorities.

5.2 Providing financial assistance for the purpose of enabling the project to be carried out, in whole or in part

The project has been allocated \$28.99M in Federal financial investment.

6 How we became aware of the project

The Green Coalition were first made aware that construction was being considered by reports of survey activity on the project site in April of 2021 This was confirmed through the office of Member of Parliament Francis Scarpeleggia in early June. The Green Coalition responded by sending the letter requesting the Federal Government to intervene addressed to the Honourable Jonathan Wilkinson, the Honourable Omar Alhabra and the Honourable Steven Gilbeault on June 5th 2021 cited in paragraph 4.4.2 above.

ⁱ Green Coalition/Coalition Verte 25 years 1988-2013

ⁱⁱ Operational Guide : Designating a Project under the *Impact Assessment Act*

ⁱⁱⁱ Canadian Impact Assessment Registry.

^{iv} Media Reports 2021

^v Sixth Assessment Report (AR6) – Intergovernmental Panel on Climate Change

^{vi} Speech from the Throne, 23 September, 2020. p.24

^{vii} Westmount Mag 3 December 2020



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- viii Letter to Minister of Environment 2 March, 2021
- ix Reply from Minister of Environment 3 June, 2021
- x Letter to Ministers 5 Jun 2021
- xi Schéma d'aménagement et de développement de l'agglomération de Montréal
- xii Parc nature des Sources - Un pas de plus vers le dernier-né des parcs-nature de la Ville de Montréal, Montréal communiqué de presse, 13 September 2013.
- xiii Plan Concept, Écoterritoire de la coulée verte du Ruisseau Bertrand. Montréal, December, 2014
- xiv Montréal Déclaration des Golfs 19 April 2019
- xv Montréal Plan décennal d'immobilisations 2021-2030, fiche détaillées, P.75
- xvi ADM inaugure le Parc écologique des Sources, ADM communiqué de presse, 22 April, 2021
- xvii Species Profile, Monarch, Government of Canada.