

**SUMMARY OF THE MEETING WITH  
INTERESTED CITIZENS GROUPS IN  
RESPONSE TO THE DISCUSSION PAPER RELEASED ON  
THE NEW CLEAN AIR ACT**

**JANUARY 27, 1996**

**Prepared by:**

**Communications and Environmental Education Branch  
Department of the Environment  
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**INTRODUCTION**

Environment Minister Vaughn Blaney held an informal meeting on January 27, 1996 to discuss issues relating to the recently released Discussion Paper on the New Clean Air Legislation. The meeting was held at the Courtney Bay Inn in Saint John from 10:00 a.m. to 5:00 p.m. Thirty-five people, consisting of members from several community and local interest groups, as well as, the Department of Health and Community Services and the Department of Environment (DOE) attended.

The purpose of the meeting was to give participants the opportunity to respond to the New Clean Air Legislation document by asking questions and voicing their opinions and concerns. The meeting also intended to provide an explanation of the Discussion Paper's specific points.

Before attendees were invited to speak, a brief description of the consultation process was made by Gerry Hill, Director of Communications and Environmental Education with DOE. He stated that it was the intent of the Province to consult with a number of stakeholders and interest groups in developing a set of concepts and approaches that could see incorporation into the legislation of the New Clean Air Act. Participants then provided several guiding principles they felt should underlie the future legislation. An explanation of each discussion point within the Paper was then made by Paul Monty, Senior Policy Analyst with DOE and author of the document. He also explained the relationship between the Clean Air Strategy developed three years ago and the new legislation proposed. After each discussion point was explained participants responded with their questions and comments.

Individuals on the **Citizens Coalition for Clean Air** who participated in the meeting included:

Nancy Allen  
Kimberly Black  
Gordon Dalzell  
Stan Devine  
Joanne Evans  
Frank Hogan  
Patty Lazotte  
Rod Ritchie  
David Sisk  
Sandra Thibodeau

**Concerned Citizens of Saint John:** Paula Tippet and Margaret Turnbull.

**The Conservation Council of New Brunswick:** David Thompson

**Department of the Environment:**

Hon. Vaughn Blaney, Minister  
Lisa Daigle

Don Dennison, Deputy Minister  
Gerry Hill, Director of Communication and Environmental Education  
Jim Knight, Director of Operations  
Christene Matthews, Reporter  
Paul Monti, Senior Policy Analyst

**Department of Health and Community Services:** Mark Allen

**New Brunswick Environment Network:** Mary Ann Coleman, Chairperson of the meeting  
and Denis Doucet

**Quispamsis Environment Committee:** Lisette MacQuarrie and Bob Wisted

**River Road Action Team:** Marlene Ross

**Saint John Medical Society Environment Committee:** Dr. N. Isa

**Washademoak Environmentalists:** Marilyn Powell

**West Isles Clean Environment Association:** Lisa Miner and Eric Teed

Unaffiliated: Elizabeth Henry  
Charles LeBlanc  
Barbara Rowe  
Gay Wittrien

Attendees were reminded that the deadline for public comment is set for January 31, 1996. Once the initial phase of consultation is complete, the next step will be the development of specific legislative proposals. A draft of the proposed legislation will be presented to Provincial Cabinet sometime this spring. After the Bill has been formally introduced in the Legislative Assembly, a second round of public consultation will begin on its detailed components.

Written responses by Dr. Isa and Marlene Ross were forwarded to DOE, as well as, a proposal by the Citizen's Coalition for Clean Air.

Early in the meeting, a request by participants was made to include various principles that would underlie the new legislation (see list below). Environment Minister Vaughn Blaney accepted that underlying principles could be implemented within the new legislation.

#### **IDEAS FOR PRINCIPLES FOR CLEAN AIR LEGISLATION**

Participants thought that there should be some underlying principles incorporated into the legislation:

- sustainable development
- protection of human health
- precautionary principle
- pollution prevention
- ecosystem approach
- biodiversity
- intergovernmental co-operation
- user pay and polluter pay principles
- realising that important % of pollution comes from outside
- people have the right to breathe clean air
- air should be of an acceptable standard commensurate to a healthy and good standard of living
- involve everyone in the solution for clean air (government, industry, citizens)

we must concentrate on local sources of pollution first  
continue to implement renewable sources of energy that are less damaging to the air and the environment  
informing the public  
clean air as it relates to the entire ecosystem

### **POINTS SUGGESTED BY THE SAINT JOHN MEDICAL SOCIETY - ENVIRONMENT COMMITTEE**

1. The DOE does not have enough inspectors in the Saint John area. The number of inspectors has to be increased.
2. We should have an effective system of even-hand enforcement for environmental laws to be put in place -- whether it's provincial or municipal.
3. Lawyers who are skilled in prosecuting environmental laws should be available to those inspectors in a consulting capacity. Inspectors aren't necessarily up-to-date on the bylaws of the environment. Some professional consulting body should be available to see how these laws should be implemented and when their broken, how they should be prosecuted.
4. The Province should put in place legislation that will facilitate private prosecution of polluters should the citizen wish to pursue this action. At the moment, citizens themselves can not take this as an action. The legislation has to be changed.
5. The citizen should have the right to seek injunction from the courts to stop industrial polluters.
6. An environment improvement capital fund to be established and funded by fines resulting from prosecutions and special taxes on high-sulfur oils. The fund should be available to improve environment and control air pollution.
7. The pollution control at the source should be the primary focus of reducing air emissions. Each industry should have the best available technology to control the emissions and this should be a requirement for operating permits.
8. The City of Saint John, the New Brunswick Electric Power Commission, the Irving refinery and mills, and all other private industries at their own costs, should take immediate concrete steps to establish control over their respective pollutants using the best available technology.
9. A.The DOE should immediately take steps to co-operate with and co-ordinate law enforcement activities with the Dept. of Health's District Medical Officer. They should also have some kind of liaison to ensure the effective control over air pollution.
10. A well-equipped and well staffed lab in Saint John to identify the analysis of environmental samples should be established.
11. The DOE jointly with the Dept. of Education should undertake a program of education to sensitize people in Saint John and elsewhere in the Province as to the need for clean air. As well, the DOE should conduct a vigorous PR campaign to keep people informed, not only of what's being done, but why it's being done.

Dr. Isa, a member of the Saint John Medical Society Environment Committee, noted that the main vision of the 11 principles proposed is: that they include effective legislative laws to protect local citizens, they educate the public and allow them to participate in the monitoring of air pollution in the City of Saint John and they sensitize industry and its employees of the existing pollution laws. As well, he added that the poor air quality in Saint John is not only causing health hazards, but has had negative effects on the city's economy. "It's very difficult to attract professional people to come to the city," he said.

### **DISCUSSION**

The following sub-headings highlight the various discussion points and the related issues raised by those who actively participated in the meeting.

#### **Air Quality Objectives and Standards (Disc. Pts #1 & #2)**

The Discussion Paper states that new legislation could be oriented toward defining ambient air quality objectives but could also include emission standards where appropriate. As well, the Government could establish, in legislation, a role for the Minister of Health in the development of air quality objectives and standards, and in responding to acute air quality problems which pose a health risk.

Some participants expressed concern about the differences between regulatory standards, which apply to specific emission sources and ambient air quality objectives. Why aren't emissions which exceed ambient air quality objectives being enforced? How are specific standards (such as sulfur dioxide) determined and by whom?

It was explained that ambient *objectives* are numbers (17 parts per 100 million) or statements (breathable air) that reflect the desired condition of air that people actually breath. A *standard* is a numerical concentration or a narrative statement that is recognized as being legally enforceable. An emission standard, for example, is one that is applied at the point at which a contaminant is released to the air from a smokestack, tailpipe, etc. Presently however, these standards can not be readily enforced because they are not easily tied to the particular emission source. Paul Monti stated that given the difficulty of applying and enforcing ambient standards, legislation will be more oriented toward defining ambient air quality objectives. The future process of determining an objective or standard it was stated, will rely on more input from the public and the Dept of Health. It will also be built so that it is more readily enforceable.

Responding to concerns raised about the scientific basis of standards, Mark Allen responded that the process is indeed based on existing science, effects on public health, effects on vegetation, materials, etc. A national Objective and Guideline Group carries out a pure risk assessment and a *reference value* is determined that no impact will generally be associated with a particular chemical. The *reference number* goes through an approval process, then comes back to New Brunswick, where it can be adopted and implemented on a local level. He noted that the risk assessment number's being put forth need to balance with the socio-economic costs associated. He stated however, that he feels comfortable that human health is being protected. At what level the public will be involved in this decision process and when is still under review, he later added.

Most participants agreed that the standards in the City of Saint John are set too high - that is, the numerical values should be lower. David Sisk and David Thompson both noted the need for site-specific standards. They feel that Saint John has unique atmospheric conditions and aversions that may at times make it difficult to meet ambient objectives; therefore, its necessary that ambient values be much lower. They also noted that air quality in Saint John should be compared to areas similar in industrial production, weather patterns, etc. (compare apples vs. apples) and not against broad based national standards.

Several participants stated that Source Point Monitoring, right from the stack, is what's needed. They suggested that it be incorporated into the new law as a tool of establishing air quality standards and objectives. As well, Paula Tippett noted that specific emission standards must be applied to all major industrial polluters.

Paul Monti responded, by stating: "If standards on ends of pipes is what is required to meet objectives, we will do that. We have the authority to do that now and that will continue. But, we will also be looking at the total process, prevention principles, the whole operations, rather than just trying to stick a number on the end."

Frank Hogan questioned whether the new law will include both general application standards and those that get translated into Certificate of Approvals. He felt that both emission standards and ambient air quality objectives are necessary. Paul Monti agreed.

Other suggestions focused on issues such as: low sulphur fuel, transfer to clean energy strategy, and incorporation of natural gas as a transition fuel.

### **Legal Designation of Air Resource Management Areas (Disc. Pt. #3)**

The Discussion Paper states that legislation could be adopted to all allow for the legal designation of ARMA's, and the establishment of a goal-oriented management system (co-operative problem solving) for areas so designated. Legislation could be created to allow the Minister of the Environment to establish advisory committees for dealing with a wide range of air quality issues.

Views on the legal designation of ARMA's varied. Gordon Dalzell, a present member of the Saint John ARMA committee praised the current process. However, he felt that the idea of an advisory committee with additional authoritative capabilities has merit and should at least be explored. He supports a community regional approach to the problems of air quality. As well, Mr. Dalzell noted that present advisory committees lack the financial resources to take action. However he said, he would support as a *minimum*, the notion of future ARMA committees (with just an advisory capacity) if they did have more financial resources. Others agreed that funds for these kinds of advisory committees and citizen committees should be provided, in at least a small way.

Kimberly Black also supported the legal designation of ARMA's: "We don't know, if we don't try. I believe the power should be decentralized - there should be an advisory committee in this city." Later she added, that governments should set the standards. The committee should also include members from the DOE, Dept. of Health, and those citizens with respiratory disease, she said. Other participants encouraged three-way communication between the public and DOE/ the public and industry - so that input could be gained equally from all parties. Participants agreed that models for these groups should be open with help and suggestions from the government. These models should also be studied and agreed upon, they said.

Frank Hogan supported the concept of ARMA committees with an advisory role, but objected to their legal designation: "I'm very uncomfortable with legislative power being vested into groups at this level...I'd like the Province to have the ultimate responsibility, the legislative authority, the power to monitor and enforce - but, to have a very strong local advisory committee of some sort."

David Sisk also expressed concern about legal designation and feared the establishment of other committees like the Region 2 Hospital Board. He suggested that the selection of ARMA's be carried out in a diplomatic fashion with nominees being brought forth, followed by a selection process to determine committee members.

Most participants also felt that municipalities must be better educated on environmental issues and air quality objectives.

#### **Public Reporting on Air Quality Status and Independent Environmental Auditing** **(Disc. Pts #4, #5 & #6)**

The paper states that the government could be required by law to publish air quality reports on a regular basis, and that it could be made mandatory for government to make public monitoring results submitted by regulated industries as part of an approval to operate. As well, the paper states that requirements for external (independent) auditing of environmental monitoring carried out by industry could be legislated as part of an industry's approval to operate.

Participants supported both points -the first as a vehicle that would increase community involvement in decision-making and the later as a check that would serve all interests. All agreed that the community has a "right to know" about the actual toxins present in the air and what could potentially affect their health and that the Province should examine the American model for "community right to know" legislation.

**They called for more public education, more interpretative data from the DOE and the Dept. of Health and a more proactive approach by industry, in the form of PSA's, media bulletins, weather bulletins, etc. to inform the public if an air quality problem is expected to occur. Other participants pointed out concerns regarding the content, timeliness and access of public information released. They felt that raw data and an interpretative summary should be both released in a timely manner.**

**As well, the term "accessibility of information" must be quantified - for example, information ought to be delivered to the citizens' office or home, as promptly as possible.**

Responding to concerns regarding the content of information released, Gerry Hill stated that the new law would require his communications department to compile monitoring data for the purpose of public reading. He added that the public has access to all monitoring data now; however, no requests have been made to view it. Mr. Hill also noted that a workshop with DOE and local Saint John media is being organized to encourage media to incorporate environment information into their daily broadcasts. As well, he said: "The Internet will essentially revolutionize the availability of this sort of information within the next three to five years.

Paul Monti continued by stating that the DOE is looking at a 'middle of the ground' approach to public reporting. As well, he noted that the issue of independent monitoring will be examined closer during the legislation development. However, he stated that he "saw no reason why information couldn't be released, so long as it did not violate the Right to Information Act."

One participant noted that the word or term "auditing" might be too strong. "Inventory" of the air quality was suggested as an alternative which may be more productive or conducive to cooperation.

Gay Wittrien suggested that an annual "State of the Environment" address could be made a requirement. "It would state that this is the way things are, this is where we're going and this how we're going to get there," she explained.

#### **Increasing Public Involvement in Environmental Decision-Making** **(Disc. Pts. #7, #8 & #9)**

The Discussion Paper states the legislation could require the government to maintain a public registry of applications for approval and renewals, they could allow for the creation of a mechanism for receiving public comment in approval review process and they could enable the development of a more comprehensive review process for smaller scale undertakings not presently subject to environmental impact assessment regulations.

Most participants felt that low -sulfur fuel should be required on a full-time basis at the major industrial emission sources in Saint John. And, the refinery in particular should be required to purchase only lower sulfur crude oil in the first place, as a part of it's license renewal. To express this point further, the Citizens' Coalition for Clean Air presented a proposal to the Province containing restrictions, an industrial inspection procedure and penalties for inclusion in the Clean Air Act (see Appendix A).

Stan Devine stated that he believed, the pollution effecting East Saint John has been manufactured in East Saint John. And, this pollution in his opinion, can only be eliminated by burning low sulfur fuel oil: "Low-sulfur oil with scrubbers in the stacks is probably the best you can do." As well, he argued that the costs between burning low-sulfur and high-sulfur fuel oil (\$110 a bottle vs. \$105 a bottle) were not significant. He requested the DOE research further the differences in cost.

David Thompson agreed with the *Citizens'* proposal stating: "If there's going to be economic arguments for using these kind of fuels, then they've got to look at big economic picture - not just the costs of one kind of fuel versus the other...There are costs in terms of health risks, costs to health care and devaluation of property. Sulfur in oil is an easily monitored and enforceable standard and the proposal brought forth by the Citizens' Coalition for Clean Air is a good one."

As well, Mr. Thompson pointed out that the Irving Refinery's existing environmental approval from DOE comes up for renewal in March '96. Mr. Thompson suggested the Minister use this as a 'pilot project' for the concept of public involvement in issuing new approvals to existing emission sources. He asked that some kind of public hearing be held before a renewed operating permit for emissions is issued.

Gorden Dalzell stated his support for discussion point #8 on the possible basis that the public could insist that low-sulfur fuel be burned and be firmly established within a companies operating permit. He also suggested that the proposed act establish why a firm would not be granted a permit to operate.

Paul Monti pointed out that details of the act will likely be dealt with at the regulation stage. Some attendees then questioned whether the proposed regulations must be in place before the Clean Air Act is proclaimed. Several participants agreed that it was more important to have an Act in place as promptly as possible, then allow the regulations to be determined. Gerry Hill noted that today's Clean Environment Act comprises of four main points of regulation: Air Quality, Pulp and Paper Industry Emissions, Ozone Depleting Substances and Asphalt and Paving Plants, which take up some 20 pages of the document. Thus, many of the regulations already exist today, he stated.

Frank Hogan noted that draft regulations should always be made available for public comment.

Paula Tippet took the opportunity to criticize the DOE's current EIA process. She felt EIA's should be made absolutely necessary for all large projects. David Thompson agreed and expressed his support for discussion point #9 stating that projects like the Irving Lagoon need some kind of EIA. He recommended that: "all large-scale projects be required to undergo a full Environmental Impact Assessment," because of the environmental problems ensuing from the Irving Lagoon

Responding to points raised regarding the EIA process, Paul Monti replied that the department will be examining the best way to deal with projects of different levels, from large-scale to small.

#### **Dealing with Small, Diverse Sources of Air Contaminants (Disc. Pts. #10, #11, #12 & #13)**

The paper states that legislation could enable the Minister to develop programs respecting a motor vehicle inspection/maintenance program on parts of automobiles, that fuel specifications could be revised to limit emissions of sulfur and other contaminants and that mandatory vapor recovery at service stations could be considered. Legislation could also enable the Minister to legislate in the area of consumer products so that only CSA approved wood stoves for example, are sold in New Brunswick.

Participants supported the idea of mandatory vapor recovery, particularly for benzene and other highly toxic compounds (volatile organic compounds).

Marlene Ross requested that the proposed legislation include other sources of V.O.C.'s such as landfills, on the list of "small" source polluters. Bob Wisted asked that mechanics, bodyshops, etc. be included in the provisions. Kimberly Black suggested that DOE contact the Province of British Columbia since they are seen as being very progressive in their control of vehicle emissions.

#### **Offense Provisions and Compliance with Environmental Legislation through Administrative Penalties (Disc. Pts. #14 & #15)**

The Summary Paper states that the new clean air legislation could give authority to the Department of the Environment to assess administrative penalties for "minor" violations. The legislation could establish the right of any two N. B. residents to apply to the Minister for a formal investigation of an alleged offense by making a solemn or statutory declaration. There could be a legal requirement for the Minister to conduct an investigation, and report on the progress of the investigation and the action taken.

Many participants expressed concern that the new laws won't be worth the paper they are written on, unless there is a commitment to active tough enforcement. It was clear that everyone felt fines for violations must be stronger. They asked that a "zero-tolerance policy" for serious violations of air quality regulations and emission permits (like that of drinking and driving offenses) be incorporated into the new proposed Clean Air Act.

Others took the opportunity to criticize the current legal system for not assessing heavier penalties for environmental offenses. Stan Devine: "A person can get seven days in jail for jacking a deer, but no jail time for jeopardizing the air that all citizens breath."

Most felt that court prosecutions and hefty fines would get results. Participants called for jail terms for deliberate violations. Others felt that directors of companies should be made liable for environmental violations by their firms. Suggestions included: fines, community work (picking up garbage) or jail time.

Another submission included a "demerit system", similar to vehicle licensing, as a tool to assess fines and permit approvals - for e.g. three violations and their operating permit is forfeited, the doubling of fines following a second offense, etc.

Frank Hogan questioned how the proposed enforcement will differ from the current act in terms of penalties, fines, absolute liability provisions, etc. He felt that a mechanism should be built into the proposed legislation that would allow citizens to challenge the government to enforce the law.

Mr. Hogan also favored the inclusion of creative sentencing in assessing violation penalties. He suggested that actions outlined in the Federal Fisheries Act - Section 79.2 (such as: disallowing the participation in an activity that could result in the repetition of the offense, fixing up the habitat damaged, directing the violator to publish the facts relating to the commission of the offense, directing them to pay compensation privately and publicly, performing community service and fines to the Crown, and the posting of bonds, etc.) be incorporated into the proposed act. He continued, by stating: "Let's get rid of the \$100,000 fine mechanism as the only way of going."

Several participants suggested that a user pay/polluter pay system be incorporated into the new act. Mr. Hogan questioned: "How are you building a financial mechanism into the act that will allow you to pay for meaningful permits, inspections and enforcement procedures? I'd like to see the Enforcement Branch strengthened by truly adopting a user pay/polluter pay system. This will give the government the financial ability to enforce laws."

Mr. Hogan also suggested that fees for the approval and permitting process be drastically increased to cover enforcement expenses. As well, Gordon Dalzell recommended that administrative penalties be registered in court to ensure payment as part of the polluter pay system. He continued by adding: "Pollution charges would have to be high enough so that they don't just become a cost of doing business. This approach can't become a license to pollute."

Other concerns included: giving law enforcers the "teeth" to carry out the law, that fines may be tax deductible and the insurance of job protection for employees who "blow the whistle."

As well, David Thompson noted that injunctions against the dangers of air pollution could be made quickly available to citizens -if health was an issue.

Responding to concerns raised about prosecution and administrative penalties, Don Dennison stated that he favored creative sentencing, restitution or equivalency over jail terms. He posed the question of whether the environment is well served by lengthy and costly court procedures for less-serious offenses, and pointed out that there's a criminal act that covers cases of criminal negligence. He continued, by adding that industrial companies do indeed view violations of environmental acts as very serious. It reflects negatively upon them in terms of their consumers and their community, he said.

### **Economic Instruments to Achieve Air Quality Management Goals** **(Disc. Pts. #16, #17 & #18)**

The paper states that legislation could include provisions for the imposition of pollution charges proportional to the amount of contaminants discharged to the environment. It could contain provisions to allow the assessment of input charges to support the market development of alternative fuels for

automobiles. It could also enable the government to levy charges to reflect the use of assimilative capacity of the environment.

There was strong support for pollution taxes and incentives, so long as these instruments are set high enough to prompt changes in behavior. Again it was noted that taxes must be high enough to be a deterrent - not just cost of doing business. Frank Hogan felt that both the quantity and quality of pollution emitted should be addressed in the final taxation -base charge. He also strongly disagreed with any form of "tradeable" air emission permits.

Lisette MacQuarrie recommended more public education as a goal to reduce pollution.

A concern was raised by David Thompson that the proposed legislation include some mechanism for economic relief if citizens suffering from acute environmental health problems are forced to leave their homes. Polluters have to supply a clean water supply to those supply they have adversely affected, he said.

Jim Knight explained that the purpose of the economic instruments is not only intended to affect the behavior of industry - but the behavior of all citizens. He said the proposed legislation will also be looking at changing individual approaches to buying more environmentally friendly products, reducing gasoline emissions, etc.

#### **OTHER ISSUES:**

#### **CARROT & STICK**

Both the carrot (objectives) and stick (enforceable standards) must be front and centre in the legislation recommended Frank Hogan. We must use all our tools.

#### **INDOOR AIR QUALITY**

Participants stated that citizens have the right to clean air whether it's indoors or outdoors. They requested that this issue of concern be included within the clean air act.

Bob Wisted expressed concern about the quality of air in some local office buildings and hospitals and the reduction in work production associated. He felt the owners of these establishments should be responsible for providing proper air quality and suggested that they be licensed to do so.

Responding to his concerns, Mark Allen stated that air quality is an increasing health concern. He said there are standards for air quality within a work place, while Public Health has some responsibility over public places such as schools and malls. There is however, a void in residential indoor air control. All of these concerns need to be assessed, he said.

#### **NOISE POLLUTION**

Several participants expressed concern regarding the noise emitted from the Courtney Bay Power Plant, the Irving mills and the Connors Brothers plant in Black's Harbour. Some felt that the noise level in general within the City of Saint John exceeds what is normally acceptable. Gordon Dalzell felt that this issue must be addressed and not left solely in the hands of municipal bylaws.

Mike Murphy responded that the noise is considered to be a contaminant. He said its becoming increasingly common that this particular issue is being addressed during the licensing approval process. Jim Knight added that issues of noise would be addressed within the objectives and standards of the proposed legislation.

## **ODOR**

Some concern was expressed regarding foul odors in the City of Saint John, particularly from the Irving Lagoon.

Responding to concerns, Mark Allen replied that the Total Reduce Sulfur (TOS) is an item on the Department of Health's work plan for this year. He noted however, that it is difficult to determine a standard number for odor because it is often detected on an individual basis.

He said that reducing odor thresholds is extremely costly and the reduction results aren't often noticed because this individualistic factor. What the standard number will be, what it's basis will be and how much the public is prepared to pay to reduce odor are all issues to be considered, he said, adding that a study by Dr. Bob Beveridge is now examining the issue of odor.

## **CONCLUSION**

In the end, one participant felt that the act in general is placing more focus on the impact of poor air quality on people than on the entire environment, including habitat, etc. Some fear was expressed that the proposed legislation would allow industry to be exempt from the regulations in some "private" way.

Responding to the concern of exemption, the Minister stated that every loophole would be closed. "We wouldn't entertain the notion of anyone to circumvent the regulations," he said.

Gay Wittrien commented that the draft proposals are too focussed on humans and should consider the entire ecosystem.