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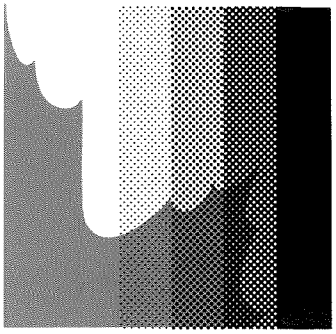

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ENVIRONMENTAL IMPACT ASSESSMENT:

THE LAW AS IT IS AND AS IT SHOULD BE

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a speech delivered by

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This paper contains
post-consumer waste

Recognizing the difficulties and pitfalls of fighting a two-front war, I shall nevertheless attempt a cursory critical examination of federal and provincial procedural and legislative initiatives thus far in the Alice in Wonderland world of environmental impact assessment.

Suffice it to say at the outset that a fair body of opinion believes that such projects as power plants (of the hydro-electric, fossil fuel and nuclear variety), highways, airports, urban development centres, industrial expansion and countless other undertakings have generally become accomplished facts without much serious public scrutiny.

I dislike cataloguing, but in Canada we are fortunate - at least for the purpose of finding horrible examples with which to illustrate speeches - to have a cornucopia of projects that have skillfully and swiftly run the gamut of administrative approvals with nary a hitch. The Vancouver Airport runway extensions; the Churchill river diversion; the proposed second international airport outside Toronto (and its fellow-travelling expressway - the Scarborough - that will run into Toronto like Saturn hitting Jupiter); the Gentilly heavy water plant in Quebec ... I could go on for hours and never even mention some of the better-known anathemas like James Bay.

All of these undertakings, however, have some interesting things in common. Approvals were issued, and in many instances construction was, or is, well down the road, before anyone thought to ask some rather basic questions like "Why?" or "What for?" or "What will be the short and long term, primary and secondary effects of such growth and development?" or "In the future will there be life after birth?"

Indeed, in the case of James Bay, the government's environmental studies of the effects of the project will probably be finished after the project is "safely" completed.

It has been said that Canada will have some of the best-documented environmental catastrophes in western civilization.

And, ah yes, the law.

Legal researchers at UBC's Faculty of Law concluded in a recent study of present federal and provincial environmental legislation on this matter by saying:

> It is not entirely accurate to say that existing law is deficient, merely that an entire dimension is missing; i.e. a strict requirement of a before-the-fact assessment before approval is given and construction begun.

The UBC team found that federal and provincial administrative agencies can use the process of issuing permits or granting approval to require the proponent of a project to produce an environmental assessment. However, such a requirement is discretionary. With one exception (the Northern Inland Waters Act) there is no law that says they must require an environmental assessment. No one can go to court to demand that approval be withheld or construction stopped because there has been no environmental assessment, or one has been done but it is inadequate or incomplete, or because the assessment indicates that the project would do unacceptable damage to the environment.

Even if there were such laws, the present rules regarding standing (i.e. who may sue) would still prevent most members of the public from raising the matter in court. The principle of standing is that only those persons who have a special interest, in the sense of having received or being likely to receive special damage beyond that of the community at large, may invoke judicial processes against the source of that damage. This is a grave obstacle to environmental protection, for concerned individuals and groups often do not have any claim or interest that sets them apart from the general public.

This, then, is roughly the state in which the UBC researchers found

Canadian law as it presently relates to environmental impact assessment.

What initiatives, if any, have been taken at the federal and provincial levels to change this less than satisfactory state of affairs?

At the federal level: In September, 1973, we watched Environment Minister Jack Davis announce a new four-stage administrative in-house procedure which would be independent of any legislation and would therefore, he said, be easier to implement. The four steps in the procedure were to be: (1) a preliminary environmental assessment, before there is any decision to go ahead; (2) a more detailed study, including the possibility of alternatives, if the first study indicated problems to be encountered; (3) a continuing assessment during the construction phase, and finally (4) an over-all analysis which would evaluate the experience for future application.

This is fine in principle. But it does nothing to change the status of the public to wedge its way into the process through, for example, hearings, or more vigorous objection via the courts.

Indeed, such an initiative on the part of the government could actually retard the movement to establish environmentally sound planning as a right maintainable in law. Administrative procedures are less available to public scrutiny and evaluation, let alone participation, than procedures established by legislation. Taken by themselves they should not be applauded or made the subject of national self-congratulation. Since they are nothing more than non-enforceable directives, which agencies cannot be legally compelled to carry out, the government is free to apply them in a hit-and-miss, haphazard, politically expedient fashion. Administrative procedures are simply the government talking to itself - and doing so, far too often, in such a way as to make sure that it is not overheard.

A case in point is the Churchill River diversion. Environmental studies of this project were being done (while construction proceeded)

not too long ago. Again: no legislation, merely administrative direction. However, the engineers, ecologists, biologists and others were not allowed to complete their studies, let alone publish what they had discovered. Mysteriously, their work was interrupted just at the time that studies began to indicate that the diversion was perhaps not such a good idea after all.

This, then, is an important point for people like yourselves who may be involved in environmental assessments in the future. Without legislation that clearly establishes public right of access to such studies, the integrity of your work can be seriously compromised, wasted and rendered mute, unless it is done under the aegis of something less amenable to political pressure than administrative procedure.

It should be added that if environmental assessments are indeed already being produced in a manner similar to the process outlined by Mr. Davis in September, then statutory recognition of the practice would cause no inconvenience, and would assure that the fundamental tenet of administrative law is observed: justice must not only be done, it must be seen to be done.

The following excerpt from the minutes of the Fisheries and Forestry Committee [Issue No.8, April 10, 1973, pp. 8:9, 8:10, 8:12] shows the view of the Ministry of the Environment. I have taken it from a speech made by John Fraser, M.P. for Vancouver South, to the Canadian Nature Federation's Annual Meeting at Acadia University, Wolfville, N.S., on August 25, 1973.

> Mr. Fraser: Let me ask this, then. I take it that what the Minister is saying is that there is a certain amount of discussion between departments on these matters and, hopefully, the Department of the Environment somehow finds out about things in time to have some input. But is there any legislation at all that makes it a requirement of another department, working within its own sphere of influence and authority, to have each project approved by Environment before it goes ahead and announces it, and gets it under way?
> Mr. Davis: There is a requirement that projects of any scale,

certainly projects that would come to Cabinet or to the higher levels of government, be checked out, not only from a financial point of view but from an environmental point of view, but this is not a requirement in law, it is an administrative requirement within the government.

Mr. Fraser: In other words, it is a function of government to try to ensure that this happens.

Mr. Davis: It is administrative and not legal.

Mr. Fraser: Has there been any serious consideration by the government to secure this procedure by enacting legislation which would require the Department of the Environment to peruse and approve of any project done by another department from an environmental point of view before it goes ahead?

Mr. Davis: I do not think legislation along those lines would be considered very rational, at least in a parliamentary type of government. You are talking about relationships between departments; you are not talking about relationships between private individuals or other governments with the federal government. You are talking about relationships between agencies and departments within a single government, and this typically is covered in all parliamentary systems by the administrative arrangements and not by a legal requirement. Surely the government can sort out its own differences internally without requiring a law of Parliament to require it to do so.

Mr. Fraser: I respect your position on that, sir, but in actual fact of course if you take for example the Mackenzie highway announcement, clearly in that case was a government decision made, presumably after consultation between various members of the Cabinet, to go ahead and do something. Yet it is not very many months later that we have the project being delayed if not stopped because of environmental concerns.

Mr. Davis: Do you think it is good or bad to delay or stop it?

Mr. Fraser: I think the delay was excellent, Mr. Minister, and I commend your department for having something to do with that. In my remarks I am not imputing any sinister motives to anybody. I think we have a very serious problem, and that serious problem is that we do not get the environmental consideration looked at early enough in the game. With respect, I say it is all very well to talk about our Parliamentary system as being some sort of excuse for not doing this, but when the need is so apparent, it seems to me that our Parliamentary system is also flexible enough to adapt to it.

It is the very answer that you gave that concerns many of us, and that it that this is a matter of administrative practice but not a matter that can be insisted upon. In the Mackenzie highway decision, it is a clear case where political and other considerations overrode any insistance that we be sure we know what we are doing before we announce to the country that we are doing it.

We recently had occasion to observe an example of the environmental review procedures now operating in connection with CNR applications for

approval to construct new lines under section 22 of the CNR Act.

As a preliminary, the CNR obtains approval from the Federal Environmental Protection Service in the area concerned. In the example we reviewed, the officer involved seems to have looked merely at the plans, not at the site. He stated "there should be no detrimental effects on the environment." On the other hand, in the Deputy Minister's memo to the Minister outlining the CNR application, the Deputy Minister stated that the CNR proposal had been "reviewed" by Environment Canada "who find that there will be no detrimental effects to the environment." (My emphasis.)

At present, the Ministry of the Environment has no power to veto such an application on the grounds that the environmental effects have not been adequately studied, or, for that matter, on the grounds that the environmental effects have been studied and have been found to be unacceptable. If an environmental assessment were required by law, it would go far to make the cursory surveillance shown in this example a reality instead of a shadow.

For yet another recent example of how projects and whole programs seem to escape federal Department of the Environment assessment, or at any rate public involvemement in scrutinizing the expected environmental effects, let's look at the Gentilly heavy water plant in Quebec.

This federal project, we read in an article in the Globe and Mail of November 21, 1973, is to cost $250 million, with construction to begin in the spring of 1974 and to finish in 1977. There is presently a nuclear power plant at Gentilly, and the Quebec government intends to build a second one there and perhaps a third. Nowhere in the article is there any mention of the Environment Ministry's role in assessing the effects of such a complex on the environment. This does not necessarily mean that there was no such assessment; but in light of the Environment Ministry's habit of making sure that the public is aware of anything they do to protect the environment, it suggests it very strongly.

So, while the federal government talks about assessment procedures, there is serious doubt as to whether these procedures are being applied evenly and consistently, or indeed whether they are being applied at all; and there is no way for the public to find out.

When there is no legislation, there is also no base from which to insist that alternatives to a project be looked into. This is illustrated by the case of the new runway at Vancouver Airport. This is an extract from the minutes of the Transport and Communications Committee [Issue No.5, April 17, 1973, pp. 5:11, 5:12] taken, again, from John Fraser's speech.

> Mr. Fraser: Mr. Marchand, has there been any study by your Department on an alternative place to put a runway in the event this location is just not acceptable?
> Mr. Marchand (Langelier): As far as I am aware, it was the only case where no alternative was envisaged. Is that the case, Mr. Huck or Mr. Harkin?
> The Chairman: Mr. Mcleish
> Mr. W.M. Mcleish (Director General Civil Aeronautics, Department of Transport): Our studies show that there is no other location for the runway at the present airport site.
> Mr. Fraser: All right. Now let me ask you this. Assume for the moment that you cannot put it there, because it is going to destroy the fishing at the mouth of the river and is going to destroy half of Vancouver South. Just assume that for a minute. Then, what would you do?
> Mr. Marchand: This is not his responsibility; this is our responsibility.
> Mr. Fraser: I am saying, has it been considered?
> Mr. Marchand: I do not think it is fair to ask him that.
> Mr. Fraser: With respect, Mr. Chairman, this surely is the key; because if you are going to go into this thing on the basis of your doing studies, but no matter what these show, you are going ahead anyway, then this does not make any sense. My question is quite a simple one: If you could not put it there, what would you have to do? There is going to be a time, one of these days, when you cannot put any more runways in Vancouver. Then what are you going to do?
> Mr. Mcleish: Our present studies show that the runway can be so placed that the preliminary investigation with respect to any influence on the water habitat just does not exist. [Sic]
> Mr. Fraser: That is not the question I asked you, sir, with respect. I said: assume that it does and assume that you cannot put the runway there; what are you going to do?
> Mr. Mcleish: This is a question that I have not contemplated because our initial investigation shows that it is highly unlikely

to be the situation.

Mr. Fraser: All right, I think I have the answer I want.

Mr. Fraser concludes:

> The fact of the matter is that there were no environmental studies and no alternative had been considered.

Our own criticism of Mr. Davis's assessment procedures is amplified by the fact that the federal Department of the Environment's own Task Force on Environmental Impact Policy and Procedure, whose report the government found it convenient to allow to languish in obscurity thirteen months after its completion in 1972, pushed for legislation which would guarantee public access to information, permit public participation in hearings and reviews, mandate consideration of alternatives to proposed projects, and establish an independent Environmental Review Board to administer the Environmental Impact Assessment Programme.

The Task Force report has this to say about provisions for environmental impact assessments within already existing legislation:

1. The statutes requiring such assessments often limit their scope to take account only of certain very specific activities which fall within the sphere of each individual enactment. This piecemeal approach results in a very narrow assessment of environmental impact.
2. There is usually no specific procedure provided for the carrying out of an environmental impact assessment under the statutes surveyed. In these cases, the effectiveness of an "impact statement" requirement may be substantially reduced. A one page report concerned merely with generalities and submitted only to satisfy the formalities of an "impact statement" requirement would be of no benefit whatsoever.
3. If a policy of environmental impact assessment is within the discretion of the administrative agency or board it cannot be guaranteed that environmental control measures are being carried out uniformly under federal legislation.

4. Because the requirement is often discretionary it appears that no administrative or judicial review would be possible to ensure effectiveness.

So much for the federal government. What about environmental assessment at the provincial level?

Several provinces over the past few months have been discussing the possibility of implementing environmental impact assessment procedures. Alberta has said it will introduce legislation in the 1974 fall session to require environmental impact statements and public hearings before projects are approved. And a few months ago, Ontario unveiled its "Green Paper on Environmental Assessment."

The Green Paper, not to be confused with a white paper which is a more definitive statement of intended government policy, outlines a number of alternative systems of assessment which the government is ostensibly considering. Four different programmes were proposed in the Green Paper, three of which would be more than satisfactory to any government bent on preserving the traditional methods of cabinet decision-making and effectively shutting out anything more than token public involvement. A fourth programme had been a glimmer of hope for environmentalists concerned with public participation in the environmental assessment process, but Minister of the Environment James Auld later told a reporter that it was just a sop to hard-line environmentalists and was not being seriously considered by his Ministry.

The Minister's attitude is more understandable, though not more commendable, if one recalls that the Green Paper went through eight or nine drafts which the other Ministries systematically picked apart in the search for a system they could live with. Unfortunately, the public will probably never know what these other Ministries are prepared to live with, since despite written requests, they seem to feel that their comments to the Ministry of the Environment are none of the public's business.

For example, Minister of Government Services James Snow said:

> The comments I have given the Minister of the Environment are for his own information and guidance and in due course, I expect he will announce what action he proposes to take in relation to the Green Paper. In the meantime, my comments to him are not for publication.

Minister of Consumer and Commercial Relations John Clement:

> There have been no official briefs presented by our Ministry on this particular subject, although our people are in contact on a regular basis with the Ministry of the Environment. You can certainly be assured that there is a great amount of consultation between the various Ministries of the Government on subjects such as this.

Assistant Deputy Minister of Urban and Regional Affairs Peter Honey:

> We are, at present, in the process of preparing an analysis of the Green Paper which we hope to present to the Ministry of the Environment in the very near future. I cannot say, at this time, whether or not we will be prepared to release this commentary to the public: my feeling is that it should remain as an internal. inter-Ministerial working document.

These comments hardly sound like those of a government which, to quote Mr. Auld, "wants the people of Ontario involved in environmental assess- from its very beginnings."

Mr. Auld has not confirmed that other briefs submitted to the Ministry, or even a list of the briefs sent and from what source, will be available to the public. With this kind of attitude to public involvement dominating the cabinet, we can hardly be optimistic about the future of the assessment process.

Many of you may already be familiar with the Green Paper proposals. Therefore I will deal with a few aspects of the Green Paper which we think require serious consideration. Responding to the Green Paper, with the four-alternate-methods format, is rather like answering a multiple choice quiz when all the answers are wrong.

Take, for instance, public involvement. As you may have noted by now, our organization seems to be obsessed with the concept of public parti-

pation. Here is why.

The environment can only be given the kind of protection it so urgently needs if the public is given the right and the power to protect it. Governments cannot do it unless the public can be constantly looking over their shoulders; for they have other concerns, economic and political ones, which tend to push environmental considerations to the end of the line. So long as decisions are made in the backrooms of government, where economic and industrial interests will always have the upper hand, the environment will be given short shrift.

Public intervention to prod the government to act is therefore essential. The problems that arise when there is no law stating that certain steps must be taken to safeguard the environment, and no legal means of redress if those steps are not taken, which I talked about earlier with respect to the federal government, exist on the provincial level as well.

Take, for example, Alberta's environmental laws. Phillip Elder, Associate Professor of Law at the University of Calgary's Faculty of Environmental Design, says that they rely heavily - if not entirely - on ministerial discretion. That is, the laws say "the minister may", rather than "the minister shall." "No citizen," Prof. Elder remarks, "can force the minister to do things. So the minister has the right to be wrong as long as his discretion is honest." We feel this is simply not good enough.

It is therefore our view that the public's right to participate in the determination and enforcement of environmental values must be codified in law. As Prof. Elder says, "threats and cajolery are important", and only the legal right for the public to threaten and cajole will ensure that the planning and assessment processes will be carried out properly and carefully and with due regard for environmental values.

For those who feel that effective environmental planning can be done without public scrutiny, we would draw your attention to the Cross Florida Barge Canal, this in a country where pub-

lic access to information and to the courts is available. The Cross Florida Barge Canal scheme was designed during World War II to allow allied shipping safe access to the Gulf of Mexico away from U-boat cruising grounds. Without ever having reviewed its priorities, the Army Corps of Engineers was still, in 1970, proceeding with this environmentally disastrous project, long after the danger from the naval forces of the Third Reich had diminished to the point where it was no longer a source of serious concern.

It was only after several lengthy court battles that this ludicrously outdated project was finally stopped. $50 million had already been spent on the project by then, and it would have cost $130 million more to complete. Again I remind you that this took place in a country that does allow public access to the courts in environmental matters. It is easy to imagine some of the planning that might - and does - occur here, where such legal safeguards are not available.

There are several means available to ensure that the public will be allowed to participate in the environmental impact assessment process.

First, the creation of an independent, powerful environmental review board is a prerequisite to public confidence in any new procedures. The board, which would sit at all times, in essence like a court, or a permanent Royal Commission, would give clear substance to the often-expressed view regarding the importance of environmental concerns. A device which would make the board responsible to the elected representatives would also be available through the legislature.

The Green Paper does mention the review board in its alternative schemes, but, with the exception of one (the one which Mr. Auld has already dismissed from serious consideration) they would all make its decisions appealable to the cabinet.

The evils of appeal to the cabinet became clearly apparent only last week, when the Ontario cabinet refused to make public its reasons for per-

mitting construction of three 29-storey high-rise apartment towers in the St. Jamestown area of Toronto. Until that point the matter had been before the Ontario Municipal Board, and there had been open discussion of the project and the criteria which should be considered. What possible excuse is there for a cloak of secrecy to enshroud the final decision at this, the most important stage in the process? The proper forum for this kind of discussion - which is, in essence, consideration of environmental policy - is the legislature where the policy was first hammered out.

Secondly, any person should be able to require the board to consider whether a proposed project needs an environmental assessment or (if one has been done) whether it adequately explains expected environmental effects.

The Green Paper says that large projects will need an assessment, small ones will not, and there will be a large "grey area" where discretionary power must be exercised in determining whether projects need such a document. However, such a discretionary screening mechanism is likely to ignore the cumulative effect on the environment of many small projects, and to delude the public into thinking that pollution and environmental degradation are being stopped when they are not.

In June of last year, the United States Court of Appeals ruled that an environmental group, the Natural Resources Defense Council, could quite properly contest the Atomic Energy Commission's contention that an environmental impact statement was not required for its liquid metal fast breeder reactor programme as a whole, only for specific sites for its plants and facilities. The court stated:

> Waiting until technology is translated into commerical projects before considering the possible adverse environmental effects attendant upon ultimate application of the technology will undoubtedly frustrate meaningful consideration and balancing of environmental costs against economic and other benefits.

Government agencies should be required to submit their planning assumptions, as well as their individual, piecemeal plans, to public

scrutiny and public challenge. If this is not done, some agencies' planning assumptions will continue to be archaic - as witness the Cross Florida Barge Canal - despite technological advances.

Thirdly, public access to all information about proposed projects must be guaranteed.

The public must have the right to have made available all the facts to which the project's proponent is party. Where industrial trade secrets or processes might be exposed, the board should have the right, in closed session, to review this aspect of the information to determine whether or not it should be made public. Also, antiquated legislation must be amended so that civil servants may comment publicly on government and private projects without fear of jeopardizing their careers.

Other factors affecting public involvement in the assessment process which must be addressed by the government before a satisfactory procedure is implemented include: the provision of public or private funds to objectors acting in the public interest; the assurance that early notice of a proposed project will reach all those interested and likely to be affected; and the guarantee that statutory requirements with respect to standing will be changed.

Presently,in Ontario courts and at many tribunals, only those with a special interest, over and above other members of the public, have standing to sue a polluter. Environmental problems in the twentieth century are unique in that there is rarely any one injured or potentially injured party. Almost by definition, a project which harms the environment injures, to some extent, all members of the public at large. Therefore, any person or organization should have the right to appear before the review board.

Further elaboration of these and other points where we diverge from the Green Paper's proposals are contained in our own brief in response to

the Green Paper, "Principles for Environmental Impact Assessment", and in this five-page summary which will be available at the back of the hall.

The Content of an Environmental Impact Statement

The spectrum of environmental concern for any proposed development is comprehensive, and includes the impact on natural resources (air, water, land); the impact on living organisms (plants, animals, micro-organisms); and a variety of impacts (aesthetic, cultural and emotional) on the human population.

To reflect this concern, the environmental impact statement must ask, and attempt to answer, three questions:

1. What is the present state of the environment in a given area?
2. What will be the effect of the new development, new project, or new product on that environment?
3. Considering all the pros and cons, is the project worth doing?

One should add here that such documents are not the sole preserve of the sciences, social and physical. When a controversy centres on matters where lay and scientific opinions are equally valid, a policy of restricting impact statements to "responsible scientific opinion" loses all force. For example, when a highway is being opposed because of is destructive effect on a community, or when citizens state that their aesthetic or recreational interests would suffer, it would make little sense to omit such views on the ground that they are not "scientific" statements. To insist, in such a context, that all statements be "scientific" would mean to restrict the subject matter of the inquiry to the point where it would be useless and would be unable to deal with the issue in question. The place of scientific opinion is in the discussion of ecological effects, while the public itself may prove the best source of information as to the significance of such effects on the quality of the human environment.

Among some of the requirements in U.S. federal law regarding contents of documents, some of the following are probably of great interest to scientists, as they relate to the scientific integrity of the document. It should be noted that it is now firm policy in the U.S., as established by several court decisions, that completion of an adequate research programme, i.e. an environmental study, is aprerequisite to agency approval.

From the U.S. Environmental Protection Agency, the following guidelines are of interest:

The body of the impact statement shall contain seven sections.... Impact statements shall not be justification documents for proposed Agency fundings or actions. Rather, they shall be objective evaluations in light of all environmental considerations. To the extent possible, statements shall not be drafted in a style which requires extensive scientific or technical expertise to comprehend and evaluate the environmental impact of an Agency action.

(a) Description of the proposed action. To prevent piecemeal decisionmaking, the project shall be described in as broad a context as possible.

(b) Environmental impact of the proposed action. (1) Describe the primary and secondary environmental impacts, both beneficial and adverse, anticipated from the action. The scope of the description shall include both short- and long-term impacts. (2) Remedial, protective, and mitigative measures which will be taken as part of the proposed action shall be identified.

(c) Adverse impacts which cannot be avoided should the proposal be implemented. Describe the kinds and magnitudes of adverse impacts which cannot be reduced in severity or which can be reduced to an acceptable level but not eliminated.

(d) Alternatives to the proposed action. Develop, describe, and objectively weigh alternatives to any proposed action which involves significant tradeoffs among the uses of available environmental resources.

(e) Relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity. Describe the cumulative and long-term effects of the proposed action which either significantly reduce or enhance the state of the environment for future generations.

(f) Irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. Describe the extent to which the proposed action curtails the diversity and range of beneficial uses of the environment.

(g) A discussion of problems and objections raised by other Federal, State, and local agencies and by interested persons in this review process.

Final statements (and draft statements if appropirate) shall summarize the comments and suggestions made by reviewing organizations and shall describe the disposition of issues surfaced.

CONCLUSION

Most of you, as biologists, may perhaps be most concerned with the above requirements for the contents of an environmental impact statement.

However, in closing, I would like to suggest that you bear in mind that the production of an assessment document should not be viewed as the end of your involvement - that you should be equally concerned that any assessment process that is adopted will reflect the centrality of that environmental assessment document in the decision-making process and not become just a study which decision-makers can put on a shelf and forget if they find its conclusions inconvenient.

Certainly as taxpayers and environmentalists, we have every right to expect that you, whether you are a civil servant or a university professor, will be accorded the same kind of attention which economic planners have always been given.

I hope that you will expect and demand nothing less yourselves.

Thank you.