

My name is David Wall and I am making this submission on behalf of the Canadian Cave Conservancy, which is a registered charity involved in education and conservation matters concerning caves and karst within Canada. As a conservation organization we often find ourselves acting as a stakeholder group speaking on matters of environmental protection regarding cave and karst resources within our home province of British Columbia. Due to our mandate we are engaged often with both industry as well as government. Due to this relationship we have some specific observations we would like to share concerning the current professional reliance model.

Collectively our group has been engaged in this sort of work since the late 1970's and we have seen many changes concerning how resources are managed within the province. I would like to say that we have seen a steady improvement over the years, but this has not been our experience. My understanding is that the introduction of this model was intended to streamline the management of the resource sector by putting expert in charge of meeting policy objectives. In terms of cave and karst management related to industrial forestry operations this approach has some real flaws. In order to highlight these shortcomings I would like to highlight a specific example.

In 2014 our organization attempted to make a formal complaint to the Compliance and Enforcement Branch at the Ministry of Forests, Range and Natural Resource Operations, concerns we had over poor practices carried out by a forest licence. As part of this complaint we provided Compliance and Enforcement with documentation detailing specific damage to caves between 2008 and 2014. In response to our complaint we were told: "the Compliance and Enforcement program does not respond to each and every complaint received from the public or interested groups, but responds in context of determined priority and risk. In saying this I would not wish to imply that in taking no response that the issue carries little to no significance or is deemed to have little importance. It may simply be that C&E doesn't action as a result of a determined or real inability to be successful in its enforcement mandate." The individual from compliance and enforcement went on to tell us where their priorities were in terms of following up on complaints:

"In the West Coast we evaluate on an ongoing basis factors or considerations that influence our response and which directs priorities. Considerations which influence our prioritisation broadly include things such as; impact to human health and safety, public interest in terms of receiving appropriate revenues, potential and actual damage to the environment. Within these broad categorisations we will consider the nature of the complaint, the scope, magnitude, degree of information supplied, regulated (professional) versus unregulated (public) community and impact of the issue. With regard to forestry issues, we rely to a greater extent on professional reliance and industry certifications."

Basically what we got out of this interaction is that the government representatives (Compliance and Enforcement) did not have the manpower and resources to follow up on our concern. If we are to consider this in terms of the professional reliance model, we see a system that is broken.

In all the cases highlighted where damage occurred to these caves, members of our organization attempted to work with members of the Association of BC Forest Professionals in order to avoid these damages. Ultimately it was professional foresters who signed the sight plans for the cutblocks that lead to these damages. To date I am unaware of the Association of BC Forest Professionals taking any action against any of its members regarding such damages. When stakeholder groups inform professionals that

damage is likely to occur and no action is taken one would think that this is a case of a professional not doing their due diligence to avoid such an outcome.

In giving this example I hope to highlight the need for strong oversight in regards to the professional reliance model. It may very well make sense to have members of professional associations responsible for determining how proponents will meet outcomes set by government but this model must be accompanied by strong oversight. Without the proper oversight I fear that professional reliance amounts to nothing more than the fox guarding the hen house.

I have included a PDF containing our correspondence with Compliance and Enforcement as well as documentation of damages in order to prove the legitimacy of our claim.

David Wall  
Canadian Cave Conservancy