

## Re: Professional Reliance Review

Submitted by David G McRae on behalf of Douglas Channel Watch (Kitimat)  
January 18, 2018

Douglas Channel Watch Society (DCW) is heartened to hear that the B.C. Government is undertaking a review of the Professional Reliance Model (PR). You are asking us to comment on what is and is not working and how to regain public trust. So far DCW sees little or no evidence of anything working well with this current deregulated and very weak model. Public trust has fallen off since the days of when Gordon Campbell deregulated the forest act and handed the keys to our public forests over to the logging companies to manage under the FRP act. Which they themselves had a hand in designing. This move was akin to handing the jailhouse keys over to the inmates to manage, and trust in government's ability then went out the window.

Since then deregulation has increased and things seem to have gotten worse as additional keys have been handed over to the private sector. We don't see the failure of the PR model as the sole fault of the Qualified Professionals (QP) as they are all quite qualified, but as the fault of a government shirking their responsibilities. Especially when it comes to the protection of our public interest to get full value for our public resources be they renewable or finite.

DCW agrees that a review of the Province's PR model is needed, but we feel that the scope of the review is far too narrow and would encourage the Government to expand the terms of reference to include the whole chain of events that leads up to the harvesting and extraction of our natural resources. The PR model is just one link. We feel that every link in this chain of events needs close scrutiny and updating.

If all the links in this chain were sound I suspect we would not have incurred the Lelu Island/ Flora Bank fiasco as it would have been instantly recognized by Government, from their own science, that this was the wrong site for any project and would have suggested another site. Instead people, towns and families were unnecessarily divided. Tempers flared resulting in years of much tension, anguish and stress. We are confident that if the Government had continued to be in charge instead of outsourcing regulatory responsibilities, things would have gone a lot smoother. This is a glaring case of a link not working and needs repair. No public trust resulted from this move.

Another unsound link we see is that which allows power line and pipeline companies to slash and burn hundreds of acres of our public natural resources for possible rights of way before an FID has even been reached by anyone. DCW finds this type of action unsettling and wrong. Was the B.C. public compensated for this action or could it be considered just plain theft and destruction of a public resource? Who do we trust? Who do we not trust?

DCW has concerns that Regulatory Outsourcing has become too susceptible to manipulation and conflict and ends up with weak and unenforceable regulations. We feel that this type of outsourcing is possibly responsible for the lack of Government oversight at the Mt. Polley tailings pond failure. Regulatory Outsourcing also resulted in Rio Tinto not installing SO<sub>2</sub> scrubbers in their new modernized smelter.

Once you have completed your review and read all the submissions on what works and what doesn't, it is DCW's hope that you toss this Regulatory Outsourcing (PR), rebuild staff capacity, get back to our own government doing the work of creating stronger regulations and laws that better control the placement of large projects and the harvesting of our natural resources which would then see a renewal of trust in a strong Government oversight.