



January 18, 2018

Submission regarding Professional Reliance Model

Thank you for the opportunity to submit our views and for reviewing this model.

Our Society was formed in 2011 and is committed to the conservation and stewardship of Howe Sound for Current and Future Generations. Our mission has been to engage the different levels of government, First Nations and stakeholders in the need for a comprehensive land and marine use plan for Howe Sound and, to inform and engage others in the issues that affect Howe Sound.

In the process of informing and engaging in issues that affect the future of Howe Sound, we have actively engaged in environmental assessment reviews over the past five years. Based on experiences first hand, please find below our observations of the EA review and our suggestions for improving public trust in the process.

These comments are based on our exposure to the professional reliance model and experiences during the course of three Environmental Assessments; Woodfibre LNG, Eagle Mountain Pipeline and BURNCO Aggregate Mine.

Creating Trust- Interactions with qualified professionals (QP):

During public Open Houses there is a short window of opportunity for the public to speak directly with the QP's about the projects. People who are going to be directly affected by a proposed project want to face the professional who may be responsible for changing their lives or may be responsible for major impacts on their lives.

What works well: When QPs are present and available to answer questions, illustrate/explain, slowly if necessary, and are ready to listen to the objections. Respect and trust are built through these interactions. Persons who take the time to attend public meetings to learn about a project and provide their opinions deserve to have their time and ideas respected by both the QP and the proponent. This process must be perceived as providing equal weight or consideration to both sides.

What doesn't work well, issues that weaken the current process

- QP has not been to the project site.
- Scientific Data collected is based on a narrow and short period of time.

- QP Is dismissive of new information unless it is communicated from a member of the public who is equally qualified
- QP Is basing conclusions on standards or regulations not perceived by the public to be relevant or appropriate to the area.
- QP who may agree with an issue raised but it is outside that QP's scope or terms of the contract, or the information may alter the outcome of the objective of the proponent, and is unable to respond to the public or provide feedback to the proponent.
- QP has overlooked stakeholders in their research and appear to be reluctant to or dismissive of requesting more input.
- QP Uses Industry-specific language or scientific terms that are not easily understood by the public to alter the paradigm.
- QP report uses dated methodology for assessing values. Missing new methodology for assessing Values such as natural capital valuations.
- Dismisses or overlooks certain value components due to lack of data or knowledge.
- QPs who are unfamiliar with the project and stand in for the project QP who prepared the data or report.
- QPs who are not based in Canada or have little or no experience with a project's local geography.
- It becomes evident the QP's are working in silos and where the areas of expertise overlap there doesn't seem to be any good communication or critical thinking.
- Inconsistent findings that appear to contradict those of competitors.
- QPs who appear to be employees of the proponent rather than an impartial qualified and/or science-based professional.
- QPs who demonstrate behaviour suggestive of a greater comfort level with the proponent than the public. From the public perspective, this arouses suspicions that the relationship between the proponent and the QP is more than arm's length.
- QPs who are former BCEAO or government employees and now possess contracts with the proponent during the Environmental Assessment period.
- QPs who appear to be monitored by the proponent and appear to be unable to speak freely to the public.

Beyond the Public Comment period it is frustrating and difficult to find resolution to issues of concern when the public are unable to ask questions or speak directly to the QP's and all communications are funneled through the proponent.

The Current environmental assessment process weakens when:

- the technical working group committee is not transparent to the public, meetings are held behind closed doors and comments are not available to the public during the comment periods.
- the tech working group is missing key people who could apply critical thinking or questions and lack a holistic view of the project.
- the tech working group are restricted from challenging the proponent's assumptions beyond their area of focus.
- there is a lack of local knowledge on the working group and the EAO does not seek opinion from another third party, therefore relying solely on the proponent's paid consultants.
- Consultants change or leave mid project.

- Large political donations made by the proponent during the environmental assessment period can be easily identified by the public.
- It is not clear the QP has been made aware of the concerns of the public or other consultants, or given access to relevant information.
- Government agencies the public understand to be responsible for environmental protection/public safety are not present to ask questions or clarify assumptions. i.e. (Transport Canada, Department of Fisheries and Oceans).
- Decisions are made in the absence of a Cumulative Effects Assessment for the region.

What is missing from the process:

Public meetings where concerned citizens can raise questions of the proponent, the QPs, government officials and verify what QP's have been telling the public would help to alleviate concerns and build trust. Managed well, public meetings provide the opportunity to hear questions raised by others and for the Assessment officers to have a better understand of the public's concerns.

Thank you for the opportunity to provide input,

Yours truly,

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