



# Cumulative Effects Framework

*Assessing and Managing Cumulative Effects in British Columbia*

## Summary of Internal Stakeholders Feedback on the CEF Policy and Overall Framework<sup>1</sup>

### Primary Sources of Feedback

Regional Management Teams; Cumulative Effects Management Committees; and staff from the Ministry of Forests, Lands and Natural Resource Development; Ministry of Aboriginal Relations and Reconciliation; Ministry of Energy and Mines; Ministry of Environment; Ministry of Natural Gas Development; Environmental Assessment Office and 250 staff participants of a Natural Resource Sector Live Meeting.

### Governance and Program Alignment

1. Clarify and ensure that the CEF initiative is aligned with other provincial initiatives, such as ABA<sup>1</sup>, ESI, FREP-MRVA tool, TSR, MaPP, EAO's reviews, MoE's work, Forest Enhancement Program, and the First Nations consultation tracking system.
2. Confirm roles and responsibilities for CE assessment. Collaborative model for conducting CEAs is preferred if it allows for provincial consistency with regional ground-truthing; but the centralized approach might have a greater chance of receiving funding.
3. Clarify roles and responsibilities for operationalizing the CEF, including roles of regional CE management teams and interagency committees. Explain if CE management teams can decide on appropriate management responses and if those responses are more suitable at the tactical/strategic level given that operational responses can be based on other regulatory frameworks.
4. Consider including First Nations in interagency committees.
5. Clarify the role of the Regional Accountable Official.
6. Provide training for CE management teams and all staff to get a better understanding of management responses and decision support.
7. Concerns about the ADM level of approval for technical documents, such as protocols and CEAM reporting.
8. Concern that the Elk Lake Assessment might create a precedent for doing the same level of work in CEAs.

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<sup>1</sup> Please see the end of the appendix for a list of acronym definitions.

9. Concern that CEF might result in additional workload at the regional level to determine a process of integrated decision-making that informs land allocation, forest timber supply, mineral dispositions, and EAO reviews.

## Values Selection

1. Clarify how social, cultural, and economic values will be incorporated in the CEF, including recreation, coastal/ foreshore, and industry values (e.g., mining, energy).
2. Need to complete regional 'value gap analyses' to identify the most common values considered across decision-making and to support the identification of regional CEF values.
3. Explain how water quality and sediment quality are being incorporated into the CEF process.
4. Approved CE value list in CEA policy should just be the five first values per ADM direction – additional values should be 'potential'.
5. Clarify the linkage between CEF and FRPA values.
6. Aquatic ecosystems is currently only limited to abiotic aquatic ecosystems.

## CE Assessment and Reporting

1. Develop a process for incorporating the effects of mitigation/ compensation, restoration and prevention activities in cumulative effects assessments.
2. Define expectations and procedures for validating CEA results, including who is responsible. Consider involvement of proponents/ licensees in validating assessments.
3. Determine an approach to considering climate change effects.
4. Clarify how assessments of potential future condition should be carried out and who is responsible for this task.
5. Indicator assessment/ reporting should be more predominant than management classes as most assessments will be the former.
6. Clarify how benchmarks are determined when there are no legal objectives.
7. Ensure provincial consistency in the assessment approach, with allowance for some regional flexibility. Clarify expectations for when CEAM reports are required – only occasionally when clear need for management responses.
8. Interim operational guidance:
  - There is value in a centralized database that the region can feed into and access, but need to ensure consistency in how data is recorded;
  - Consult regions prior to its information being posted publicly on a provincial site; and
  - Provincial team should consider various tools being used within regions (e.g., ALCES model).
9. CE Policy and approach focuses on value by value assessment and management, but does not address interactions across multiple values, or incorporate a 'systems' approach.
10. Ensure consistency with GeoBC datasets.
11. Ensure adequacy of high quality data for conducting regional CEAs; optimize data sharing opportunity.

12. Illustrate the process of ‘assessment,’ including how the development footprint is included in assessments.
13. ‘Current mitigation’ should be renamed ‘current management direction and practices’; clarify expectations for CEAM reporting (i.e., only where substantive issues).
14. Concern with reference to ‘historic’ in current condition definition – careful description will be required to avoid engaging in debate over picking historic timeframe to assess.
15. Consider changing traditional knowledge to community knowledge.
16. Move any references to management terminology in Part 1 of the policy to Part 2 of the policy, since Part 1 is to solely focus on CE assessment and Part 2 is to solely focus on CE management.

## CE Management

1. Clarify (in Policy and / or Interim Guidance document) the expectation for decision-makers to consider CE in some or all decisions and by what timeframe.
2. Provide further examples and/or guidance for regional authorization staff on how CEAs can affect different authorizations and/or should be used to identify management responses.
3. Develop one tool for internal and external stakeholders to access CEA results.
4. Comments on management classes:
  - Revise class names, remove current terms and triggers, and show gradual colouring. Current names imply some level of work, which is not necessarily appropriate in each class;
  - “green” class does not enable management responses;
  - “enhanced” class signals non-compliance/ has no legal basis, and thus should be interpreted as additional information or precautionary approach (in forestry, this class does not have meaning and can be seen in a negative light);
  - “enhanced management trigger” – need to define expectations or guidance for how this is defined;
  - timeframe for updating management classes should be defined; and
  - management classes should be applied to broad objectives as well as specific.
5. Comments about management responses:
  - CE management responses should be developed at the regional level;
  - CE management responses should largely be provincially consistent;
  - CE management responses should be defined based on the results of ‘broad objective assessments’ as well as management classes; and
  - Clarify where the EMP might be used to consider management responses.
6. A primary value of CEAs are to support landscape level planning and mitigation, including mechanisms for environmental offsetting.
7. Update Guidance for Consultation Staff to emphasize how it is different from the Interim Guidance, and ensure it meets the specific needs for considering CE in the context of First Nations consultation and accommodation.
8. Clarify the need for a separate rationale for considering CE in the context of First Nations consultation and Accommodation specifically.

9. Leverage technology for Interim Guidance through NRPP where CEAM reports are built as a layer in the database.
10. Ensure that CEAM reports are concise and user-friendly for staff.
11. Ensure that the CEF tool is long-lasting within any underlying agenda to develop more “no’s” or “yes's”.
12. Strategic/ tactical recommendations that would flow from information on CEAM report via subject matter experts needs to be easily interpreted for operational decisions.
13. Question the value of further pilot areas, recognizing also that expansion of the CE process within the region needs to be gradually progressive based upon available resources.

## Engagement

1. Ensure early on and ongoing engagement and collaboration with First Nations to manage their expectations.
2. The CEF has value in engaging First Nations and industry, but should not be driven by First Nations’ or industry’s issues.

## List of Acronyms

Acronym	Full Name
ABA	Area-based Analysis
ADM	Assistant Deputy Minister
ALCES	A Landscape Cumulative Effects Simulator
CE	Cumulative Effects
CEA	Cumulative Effects Assessment
CEAM	Cumulative Effects Assessment Management
CEF	Cumulative Effects Framework
EAO	Environmental Assessment Office
EMP	Environmental Management Plan
ESI	Environmental Stewardship Initiative
FLNR	Ministry of Forests, Lands and Natural Resource Operations
FREP	Forest and Range Evaluation Program
FRPA	<i>Forest and Range Practices Act</i>
GeoBC	Geospatial British Columbia
MaPP	Marine Plan Partnership
MoE	Ministry of Environment
MRVA	Multiple Resource Value Assessments
TSR	Timber Supply Review