



Cumulative Effects Framework

Assessing and Managing Cumulative Effects in British Columbia

Comments Received during CEF Phase 2 Engagement

Natural Resource Sector (276 comments catalogued)

Three main industry sectors provided feedback on the draft CEF policy: energy, forestry and mining. A total of 276 separate comments were catalogued, including 79 from the energy sector (from four stakeholders), 60 from the forestry sector (from five stakeholders), 115 from the mining sector (from two stakeholders), and 22 from a multi-sector business council. Comments from the business council have been incorporated in their appropriate sector section below. Comments represent high-level summaries and do not attempt to represent all of the 276 detailed comments that were catalogued during engagement.

Energy Sector (79 comments catalogued)

1. Clarify potential policy impacts on the referral process and timing to help identify upfront costs for proponents and provide investment certainty.
2. Ensure the fair treatment of assessment implications across sectors and between past and future projects so that no particular sector or project is unduly disadvantaged.
3. Align policy with the Area-Based Analysis tool and similar energy sector initiatives.
4. Document and report on data quality, uncertainty, assumptions, validation process, management interpretation and management limits to avoid assessment data being misused.
5. Regularly update future condition modelling to reflect that some approved projects will not be completed due to changes in the market place that no longer make projects feasible.

“We are supportive of the BC Government and its efforts to develop a Cumulative Effects Framework (CEF) and associated policies and protocols to inform decision-making... The implementation of a comprehensive policy framework for CEA and management is a positive step to building public trust and assurance that the development of the LNG sector and other opportunities for economic growth consider changes to the environment.”
Canadian Energy Pipeline Association

Forestry Sector (60 comments catalogued)

1. Ensure the enhanced management class does not trigger incremental requirements beyond the current accountabilities under the *Forest and Range Practices Act (FRPA)*.
2. Clarify the scale for which assessments will be produced, and weigh different indicators in different regions or population units.
3. Clarify if CEF assessments will be applicable in areas with current and comprehensive land use plans (e.g., Great Bear Rainforest).
4. Ensure assessments are consistent with Forest Stewardship Plans.
5. Consider having timber as a value.

"We support the development of a Cumulative Effects Framework for BC. Such a framework will ensure an effective, consistent, and streamlined process to manage for cumulative effects across the province." **Council of Forest Industries and Coast Forest Products Association**

Mining Sector (115 comments catalogued)

1. Ensure the policy identifies and addresses the primary causes of cumulative effects so that it is not at risk of becoming another regulatory layer.
2. Analyze and explicitly identify what existing government legislation, regulation, policy, and decisions will be influenced or affected by assessments.
3. Enable consistent policy application to all land-use decisions to ensure that the policy does not pose an undue and ineffective layer of regulatory burden onto the mining sector.
4. Consider adopting the goal of halting negative trends for values unless the slowing of a trend could be reversed at some future date.
5. Eliminate any bias in the policy towards major projects contributing disproportionately to cumulative effects instead of the more numerous smaller projects.

"The assessment of social and economic values in the context of cumulative effects is extremely important to responsible resource management in B.C." **The Mining Association of BC.**