



# Cumulative Effects Framework

*Assessing and Managing Cumulative Effects in British Columbia*

## Comments Received during CEF Phase 2 Engagement

### Professionals and Practitioners (191 comments catalogued)

Comments from professionals and practitioners were primarily provided by independent consultants and professionals from 14 environmental consulting firms involved in the natural resource sector. Though their backgrounds varied, many of these individuals were involved in conducting environmental impact assessments for proposed large development projects. Their common concerns are summarized below. Comments represent high-level summaries and do not attempt to represent all of the 191 detailed comments that were catalogued during engagement.

1. Ensure policy fairness regarding mitigation obligations considering that earlier proponents may incur fewer mitigative costs than successive proponents as cumulative effects accumulate.
2. Clarify if management classes can change between the time of application and the actual start date of the project, and how this might affect the proponent.
3. Ensure the policy does not unintentionally drive and concentrate development from enhanced and intensive management areas to standard management areas.
4. Clarify how CEF values and assessments interplay and overlap with the *Canadian Environmental Assessment Act's* valued components and assessments.
5. Consider having non-declining stores of carbon in terrestrial ecosystems (soils and biomass) and ecological resilience to climate change as values.

“Good work on the CEF policies and the framework. Using statistically sound inventory data for key values, that is incorporated and continually updated over the longevity of the program, will increase the effectiveness of the framework.” **ABCFP Stewardship Committee**