



Monday, 30th July, 2018

To: Hon. George Heyman, Minister of Environment and Climate Change Strategy

CC: BC Environmental Assessment Office

Submitted via email to:

ENV.minister@gov.bc.ca; George.Heyman.MLA@leg.bc.ca; ea.revitalization@gov.bc.ca

RE: Provincial review of the Environmental Assessment process

Dear Minister,

My Sea to Sky is a people-powered environmental organization that was founded in 2014 with the mission to inspire and empower British Columbians to safeguard the spectacular natural legacy of Howe Sound. We actively advocate against unsustainable industrial projects that threaten the recovery of At'Kitsem / Howe Sound by organizing educational events; coordinating research; building partnerships and respectful relationships; lifting up First Nations voices and culture; and facilitating public engagement with our municipal, provincial, and federal governments.

We currently represent more than 20,000 people that have supported our campaigns to stop Woodfibre LNG and its associated FortisBC pipeline and compressor station, stop the proposed Burnco gravel mine, and protect Howe Sound.

We would like to congratulate this government on initiating a review of the environmental assessment process, and appreciate the opportunity to provide input as stakeholders.

Unfortunately we were not aware of this most recent engagement opportunity until late last week, and have not had sufficient time to review the Discussion Paper. However, we have written many of our concerns and recommendations for how to improve the environmental assessment process as part of our submissions to inform the CEAA review panel, as well as the recent Provincial review of the Professional Reliance approach. I have attached these previous submissions as they are still relevant to this review of the Environmental Assessment process, and illustrate several of the issues we have experienced:

- 1) 2016-12-11 Visual Science presentation to CEAA review panel
- 2) 2016-12-23 Visual Science follow-up letter to CEAA review panel
- 3) 2018-01-19 My-Sea-to-Sky - review of professional reliance

Based on our (very) brief review of the Discussion Paper, we are pleased to see a commitment to implement UNDRIP and the TRC Calls to Action, and include Indigenous nations in decision-making processes. We are also pleased to see that early engagement is incorporated into the process.

However a few key issues still need to be addressed to restore public trust in the EA process:

- 1) Replace the professional reliance approach with independent oversight and peer-reviewed science to remove inherent bias from the process.
- 2) Enable meaningful public participation by increasing timeframes for engagement, and providing funding to local organizations to help facilitate public engagement.



- 3) Set up a transparent process that incorporates public support as a metric to determine the final EA decision by the Ministers, and give communities and First Nations decision-making power.
- 4) Evaluate all components of a project, including upstream and downstream impacts, cumulative impacts, and total climate change emissions.
- 5) Ensure that Provincial (and Federal) climate targets can be met, and that projects will not hinder efforts to meet legislated greenhouse gas reduction targets.

We thank you for the opportunity to inform this review of the professional reliance model. Please feel free to contact us for further information or clarification.

Sincerely,

Tracey Saxby BA/BSc (Hons I)
Executive Director
My Sea to Sky
Email: tracey@myseatosky.org
Phone: +1 (604) 892-7501