



July 27, 2018

Hon. George Heyman
Minister of Environment and Climate Change Strategy
ENV.minister@gov.bc.ca

Dear Minister Heyman and the B.C. Environmental Assessment Office,

RE: Environmental Assessment Revisions

BC Nature (the Federation of BC Naturalists), which represents more than 50 naturalists' clubs and 6500 members province-wide, commends our government for the goals and process of revitalizing BC's environmental assessment process. We heartily agree "EA decisions should be informed by both high quality, robust, credible scientific information and Indigenous knowledge". We would add to this statement that all EA decisions should be made in the context of a broad vision of environmental and economic health. As naturalists' familiar with BC's species and spaces, we particularly welcome the opportunity to participate meaningfully in all stages of the environmental assessment process and to provide input consistent with our motto: "To know nature, and keep it worth knowing".

BC Nature agrees with and supports the points listed in the discussion paper to restore public confidence in the EA process. While we certainly agree with the items supporting reconciliation and proper recognition of Indigenous rights, we caution that the stewardship of healthy ecosystems should always be the goal. Furthermore, we call on the government to recognize, through meaningful action, the rights of all British Columbians, particularly local communities, in receiving adequate benefits (e.g., employment, community development) from resources that come from their area/surroundings. The forest industry exemplifies the boom and bust nature of resource extraction for local communities, in addition to the long-term environmental consequences visited upon the landscape for other species. Oil and gas development causes similar impacts in northeastern BC. We need more value from our resources to create a more sustainable and thriving economy, particularly in our rural areas.

In the Pathways to Sustainable Project Approval section, we would like to see explicit mention of protection of species at risk as well as protection from chemical applications and physical modifications harmful to terrestrial and aquatic organisms. Cumulative effects assessment based on science is a critical foundation to ensuring that environmental assessments take full account of all factors that may or are affecting our environment on a local, regional, provincial, and even global scale.

We emphasize that the EA process must account for future environmental and social impacts of project activities. For example, our organization and members were extremely disappointed to see the devastation caused by the Mount Polly mine disaster and the government's unwillingness to hold Imperial Metals fully accountable for the horrific short and long-term social and environmental damages that they caused.

Another pertinent example that we already experience is the planetary consequences of fossil fuel extraction (e.g., wildfires, mountain pine beetle epidemic, water temperatures rising, extreme flooding). We need to link our EA process to these consequences, and those corporations benefiting from approved projects need to account for them. BC taxpayers, Canadians, other citizens of the world, and other species and ecosystems should not bear the costs of these impacts. Corporations that have their projects approved must meet strict environmental and social standards during and following the completion of their activities.

As we have previously written, Professional Reliance must default to government and independent scrutiny. A timely and predictable process is important; however, if game-changing facts arise during the scripted timeline, allowance must be made for time to properly assess new information before moving on. We support an iterative approach to the application process, as this will enhance not only communication, but also reveal areas requiring investigation that may not have been apparent. We consider stringent post-certificate monitoring to be essential, along with prompt, open adjudication of potential conflicts.

Our resources are finite and our planet and its species are in serious trouble. We need to move away from fossil fuels and other non-renewable resources and towards renewable resource projects, with an economy that accounts for the true costs and benefits of projects (e.g., reducing environmental externalities).

BC Nature stands behind the Priority Provincial Government Initiatives to:

- Review the professional reliance model
- Modernize land use planning
- Enact an endangered species law
- Advance the cumulative effects framework
- Implement a comprehensive climate-action strategy

Yours truly,



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(Federation of BC Naturalists)

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