



July 30, 2018

Josh Thompson  
Manager, Outreach and Stakeholder Engagement  
The Environment Assessment Office  
PO Box 9426 STN Prov Govt  
Victoria, BC V8W 9V1

Dear Mr. Thompson,

**Re: Environmental Assessment Revitalization Consultation**

I appreciate the opportunity to provide feedback on the Environmental Assessment Revitalization discussion paper on behalf of members of the BC Government and Service Employees' Union (BCGEU).

The BCGEU represents more than 77,000 workers in various sectors and occupations in more than 550 bargaining units throughout British Columbia. Our diverse membership includes workers in direct government and throughout the broader public and private sectors.

Our members protect children and families, provide income assistance to vulnerable individuals, fight forest fires, deliver care to people with mental health issues and addictions, administer B.C.'s public system of liquor control, licensing and distribution, staff correctional facilities and the courts, and provide technical, administrative and clerical services. Our members provide clinical care and home support services for seniors, a diverse range of community social services, highway and bridge maintenance, post-secondary instruction and administration, as well as other non-governmental industries, including financial services, hospitality, retail and gaming.

Our members live and work in communities across B.C., and are directly impacted by major industrial projects. Further, nearly 5,000 BCGEU members staff the public agencies that are responsible for protecting B.C.'s environment and managing our natural resources – collectively known as the “dirt ministries,” and including the Environmental Assessment Office.

These workers are on the frontlines of the environmental assessment process. They include biologists, forest technologists, mining inspectors, park rangers, GIS analysts, conservation officers, First Nations relations advisors, water resource specialists, natural resource officers, environmental protection officers, administrative professionals and many more. The BCGEU also represents workers involved in resource management at the Freshwater Fisheries Society, two regional districts, the Wilderness Committee, and the Oil and Gas Commission.



Overall, the BCGEU supports the proposals outlined in the discussion paper. In our view, their implementation would result in a greatly strengthened environmental assessment process, including genuine government-to-government involvement by Indigenous Nations, greater transparency, and real opportunities for communities to participate and have their concerns heard and addressed.

However, building a stronger, more transparent process will also require building stronger, more proactive public agencies – including the Environmental Assessment Office itself. After two decades of deep staff and funding cuts, today's dirt ministries do not have the capacity to effectively support an enhanced environmental assessment process.

For instance, the discussion paper proposes that regional and strategic level assessments could provide the building blocks for individual project assessment. We know that good assessments – be they environmental, social or economic – need good data. Yet presently B.C.'s forest and wildlife inventories are to a large extent incomplete, out of date or nonexistent. Water and air quality monitoring are limited in scope. In short, there has been a lack of public investment in gathering data about the state of our province's environment and resources. Adequately supporting future assessments requires investing in better information.

The discussion paper also contemplates “compliance and enforcement of all EA certificate conditions: environmental, economic, societal, cultural and health” after an EA certificate is issued. Last year, the BCGEU produced a report documenting deep staff cuts and a corresponding steep decline in oversight by FLNRORD's compliance and enforcement program. Similarly, in reviews of mining and environmental assessment, B.C.'s Auditor General pointed to a serious lack of resources for compliance and enforcement. Going forward, delivering effective compliance and enforcement of EA certificate conditions will require more “boots on the ground” in Ministry compliance and enforcement programs.

Evaluating the effectiveness of certificate conditions is another area that will require additional resources, since in the past such evaluations have been limited or not completed at all. Further, the discussion paper proposes a technical advisory committee that includes Ministry experts. Effective participation by government experts requires that public agencies invest in developing staff expertise, and have the capacity to lend their people to these processes as they arise. In addition, it seems clear that the strengthened process outlined in the discussion paper will require more staff in the Environmental Assessment Office to execute.

Finally, we believe these functions – compliance and enforcement, inventories, monitoring, and regional and strategic assessments – belong within public agencies, conducted as much as possible by public servants rather than delivered as one-offs by an array of different contractors or volunteers. Supporting a robust environmental assessment process requires being a ‘knowledgeable owner’ of BC's lands and resources. The provincial government – not project proponents or environmental consultants – is responsible for managing B.C.'s land base on behalf of British Columbians. Doing this effectively requires investing to restore scientific and operational capacity within our public agencies.



Thank you for the opportunity to provide this submission on behalf of BCGEU members.

Sincerely,

Stephanie Smith  
BCGEU President

MS/gg/MoveUP