



First Nations Health Authority
Health through wellness

Briefing Note

SUBJECT	Provincial Environmental Assessment Revitalization
TO	Ministry of Environment and Climate Change Strategy
FROM	First Nations Health Authority
DATE	July 30, 2018

Purpose

This note is to provide feedback on the provincial *Environmental Assessment Revitalization Discussion Paper*.

Summary of Feedback

Overall Observations

- FNHA acknowledges the work of the province towards provincial Environmental Assessment (EA) revitalization, and is appreciative of the opportunity to provide feedback on this important work. This submission builds upon previous recommendations co-submitted by FNHA and Regional Health Authorities to the Minister of Environment and Climate Change Strategy in June, 2018 (see attached).
- Although the discussion paper includes consideration around the need for strengthened social impact assessment (pg.11), there is also need for action towards improving health impact assessment within EA. The EA process tends to be heavily weighted towards assessing impacts to the physical environment, with less rigor, scope, and sensitivity to health and social impacts. A clear and legislated definition of health consistent with our understanding of the determinants of health and inclusive of the philosophy of health and wellness as defined by Indigenous peoples and communities (see *First Nations Perspective on Health and Wellness*¹) and that recognizes health impacts beyond toxicological impacts (e.g mental health, social connectedness, access to services), as well as clear policy and guidance on expectations and approaches for assessing impacts consistent with this definition, will support high quality health impact assessment within EA. The strengthening of social impact assessment needs to be inclusive of impacts specific to Indigenous communities such as access to traditional foods and cultural practices, as well as issues such as affordable housing, economic stability and safety that can often be impacted through project development (e.g risk of sexual violence related to work camps, economic and social impacts from boom and bust cycles). Renaming the *Environmental Assessment Act* to *Impact Assessment Act* (or similar) would underscore the need for Government to take a holistic, integrated and comprehensive approach to major project assessments.
- Revitalizing the EA process inclusive of strengthened social and health impact assessment, increased opportunities for early and ongoing engagement with Indigenous nations and in support of meaningful participation by communities across the EA process for all 5 pillars (environmental, economic, social, heritage and health effects) will serve to support Indigenous peoples in BC towards self-determination over project development. However, there is also a need to recognize the increased burden these revitalized processes may place on Indigenous communities. Communities that are invited but unable to participate in the EA process due to limited resources and/or capacity risk experiencing further disparities as project development is perpetually informed by those with existing capacity to participate in the process. Opportunities and funding for participation and engagement need to also include flexible funding and supports for community-based capacity-

¹ <http://www.fnha.ca/wellness/wellness-and-the-first-nations-health-authority/first-nations-perspective-on-wellness>

building to facilitate meaningful participation. For example, this could include flexible funding to Nations to hire independent contractors with specific expertise to support unbiased assessment work and technical review. There is also a need to enhance staffing, expertise and resources within and available to government and health authorities to develop cross-sector capacity and knowledge in support of working with Indigenous communities in culturally safe ways. This includes guidance to project proponents around ensuring their time and resources are recognized and respected. A strategic review to understand current and potential impacts to community and sector capacity in delivering the proposed changes to the EA process is recommended.

- The requirement for all EAs to include assessment of cumulative effects is an important and positive step. In addition to project-level assessments inclusive of cumulative effects assessment, there is also a need for regional-level assessments that capture potential cumulative effects related to multiple smaller projects that may not trigger assessments individually. Inclusion of a regional element within the *Reviewable Project Regulations* would serve to ensure cumulative effects from smaller projects are considered within criteria used to trigger an EA.
- While the discussion paper includes several actions towards increasing public confidence in the assessment process (for example, ensuring reasons for decisions are public and based within legislated decision criteria, and changes supporting increased opportunities for First Nations, stakeholder and public engagement) the revitalized process as outlined still appears to be heavily proponent-driven, and lacks clear mechanisms for cross-government decision-making beyond the Ministry of Environment and Climate Change Strategy. There is a need for actions towards greater separation of assessment funding from direction and coordination of EAs as well as the need for strengthening of cross-government decision-making to ensure referral to and participation by relevant health and social ministries.
- There is currently no mention of the EA revitalization process including climate change considerations or impacts from reviewable projects. Impacts associated with accelerating climate change pose serious environmental, socio-economic and health risks to First Nations in BC and all British Columbians. Consideration of climate change within an EA process is vital towards ensuring effects assessment is inclusive of potential climate change impacts both from the project and on the project.

Section-specific feedback

Introduction

- Fifth paragraph. "EA revitalization is intended to result in changes to EA legislation, regulations, policies, and practices that...3. Protect the environment while offering clear pathways to sustainable project approvals". Reflective of the role of EA in assessing impacts across the 5 pillars, the purpose of EA revitalization is to not only protect the environment but protect from effects across the 5 pillars. This understanding should be supported through legislative and policy changes towards strengthening of health and social impact assessment as part of the EA process, as detailed throughout this submission.

Summary of Engagements to Date

- Fourth paragraph. It is unclear if direct engagement with "expert EA practitioners" included any health or social impact assessment practitioners. Engagement directly with these experts is necessary to get a more holistic perspective on the challenges of the current EA process, the opportunities for improvement, and recommended changes.

Focus on public confidence

Do these proposals support public confidence in EA and ensure meaningful public participation?

- As outlined in the discussion paper, legislated decision criteria supported by published reasons for a decision will serve to support greater public confidence in the EA process. This can be further supported through ensuring a clear and transparent process for determining this legislated criteria inclusive of factors and considerations across the 5 pillars.
- As outlined under *Process certainty and predictability*, public confidence needs to be supported through effective standards, methodologies and processes for EA developed in collaboration with communities.
- To further support an "all of government" approach and improve neutrality and transparency a revitalized EA process should include revised funding models to ensure a clear separation of the assessment funding role (usually the proponent) from the assessment direction and coordination roles that include recruiting and hiring consultants for conducting assessment, as well as the strengthening of a cross-government decision-making framework for impact assessments to ensure referral to and participation of ministries with mandates in health, heritage, and economic and social development.

What should be included in a purpose section of the EA Act?

- FNHA understands the overall objective of a project assessment is to minimize harms and maximize positive benefits across the 5 pillars. In addition to ensuring legislative and policy changes that require the assessment of both positive and negative impacts (such as currently outlined in the discussion paper), there is an opportunity to frame a revitalized EA process through legislation that acknowledges this overall objective (such as through a purpose section) while supporting its implementation. Recent work in this area, including a report summarizing Northern BC First Nation communities engagement on health impacts from resource development (FNHA & Northern Health, 2015) and a report developed by provincial health agencies (Northern Health, 2018) on the social determinants of health impacts may assist with this recommendation.

Focus on Reconciliation

- Fourth bullet. Recommendation to ensure EA funding for Indigenous nations is inclusive of funding for base-line health, socio-economic and environmental data and to enhance community-specific surveillance systems to enable better assessment of health impacts over time.
- Eight bullet. In relation to the above, clarity is needed to ensure Indigenous nations are supported in the early collection of data and information inclusive of baseline environmental, social and health data.

Arrangements would need to be in place at the technical level for consensus-based processes between the EAO and Indigenous nations to be effective?

- While this question is more appropriate to be answered at the community-level, the implementation of health working groups inclusive of Indigenous community participation may facilitate consensus-based processes at the technical level by providing a space for the discussion and review of health-specific data and considerations. In addition, having enabling agreements in support of technical partners (such as HAs) to work with communities and the EAO effectively.

Consent, from Indigenous governing bodies required?

- Content needs to be obtained early and often, always starting at the readiness gate.

Alternative Dispute Resolution and EA Advisory Committee Recommendations

- FNHA is in support of the four places as recommended by the EA Advisory Committee as a very positive step towards ensuring consensus-based decision making.

Focus on the Environment and Offering Clear Pathways to Sustainable Project Approvals

Do these proposals support protecting the environment and offering clear pathways to sustainable project development?

- Third bullet. Cumulative effects assessment should include consideration of effects across the 5 pillars, as well as historical context (such as the historical and ongoing impacts of colonialism) on communities and the interactions of these effects with the project.
- Fourth bullet. Need to also include management plans prepared in advance as part of the EA process to capture and manage risks, such as those related to the spread of communicable diseases.
- Sixth bullet. The strengthening of social impact assessment needs to be inclusive of impacts specific to Indigenous communities including impacts to traditional foods and cultural practices. Reports such as the First Nations Food, Nutrition and Environment Study (Chan et al., 2016) can serve to inform this work.
- First bullet. "Protecting the environment and fostering sustainability across the five pillars". As supported by the feedback and recommendations outlined within this submission FNHA understands the role of a holistic, integrated and comprehensive impact assessment as to not only protect the environment but to protect health and social well-being while fostering sustainability across the five pillars.

How would you apply sustainability criteria and the precautionary principle in the context of EA?

- While this section outlines actions in support of "sustainable development" there is a need for a clear definition of sustainable development within legislation and policy that is inclusive of net benefit to current and future generations. Furthermore, incorporating the United Nations Sustainable Development Goals (SDGs)² and standards such as the World Bank IFC Performance Standards on Environmental and Social Sustainability in the assessment framework will help ensure that the revitalized EA process is holistic, integrated and comprehensive.
- Application of the precautionary principle in the context of EA needs to look at worldwide best practices and international standards (e.g such as those in Europe³) that work to shift the burden of proof to the proponent to prove a project is safe. Given there is likely to be increased uncertainty when assessing impacts to Indigenous populations due to data gaps, following the precautionary principle regional or provincial averages should not be used to make assumptions. As outlined within this submission, a revised EA process needs to provide funding mechanisms and system supports to Indigenous communities towards the collection of baseline data to improve certainty at the community level. Application of traditional knowledge should also be used to inform decision-making and towards the filling of gaps.

Process certainty and predictability

Do these proposals support process certainty and predictability of the Process?

- Tenth bullet. The EOA "identifies requirements and provides guidance and training to proponents, consultants and other EA participants in important areas of the process including expectations for early engagement activities, EA methodology, and methods of effects assessment". Nations need access to independent, unbiased human health and social risk assessments. A major reason underlying the limited scope often used in assessing health impacts, as currently practiced in the EA process, is the predominance of experts trained in the physical sciences conducting and leading the assessments, both at the proponent and regulatory level. Recommendation to establish clear

² <https://sustainabledevelopment.un.org/?menu=1300>

³ http://ec.europa.eu/environment/integration/research/newsalert/pdf/precautionary_principle_decision_making_under_uncertainty_FB18_en.pdf

professional qualifications, competencies and standards for individuals undertaking community-level engagement and social and health impact assessment and that any training and guidance provided by the EAO regarding health and social impact assessment is both developed and delivered by experts that meet these standards. Cultural Safety and Humility training should also be a requirement for those working in support of Indigenous communities.

- The development of standards, methodologies and processes governing performance of health and social impact assessments should be developed in full partnership with Indigenous nations and support the need for flexibility in meeting the needs of communities.
- There is also a need to enhance staffing, expertise and resources within government and health authorities to be able to critically review the work of qualified professionals, participate in the EA process meaningfully and develop guidance and policy to support the EA process

What Projects get Assessed?

What criteria should be applied for designation of projects not on the list as reviewable?

- While section outlines revision of the *Reviewable Project Regulation* towards use of more appropriate criteria (based on potential for a project to result in adverse effects instead of on a project's potential production capacity) there is need to ensure this revision includes clear triggers and thresholds that consider potential for adverse effects across all 5 pillars.
- Reviewable project criteria should also consider the sensitivity of populations that may be impacted by a project. Different levels of vulnerability may be experienced by different communities influenced by intersectional factors (e.g capacity, available resources, and geographic location).
- Introducing a regional element to project reviewability triggers would allow for consideration of potential for cumulative effects related to multiple smaller projects that may not individually trigger an assessment to trigger an EA.

Proposed Environmental Assessment Process

- The need for early collection of data (including collection of baseline health and social data) is referred to earlier in the document (see above), however clarity is needed when this would occur in relation to the project process as outlined.

What timelines (if any) would be appropriate for each phase?

- While the need for formal timelines is discussed throughout the document in support of ensuring certainty and predictability in the EA process, there is also a need for legislation and policy pertaining to process timelines to account for differences in capacity and processes among Indigenous communities that may require flexibility in these timelines in support of full and meaningful participation by communities.

Building Blocks

Are these the right building blocks needed to support a clear, effective EA process? Are there others?

- Bullet four. "Reconciliation" and "Sustainability" Offices as new concepts require clarity including need to ensure these Offices will this follow the principles of OCAP, such as eluded to within bullet five.
- Bullet eight. "Project EAs should have a clear linkage to requirements in subsequent permitting." Need for clarity around situations where there is not a permitting process as well as ensuring clear relationship between initial EA and the requirement for ongoing monitoring. These need to be supported by clarity in roles, responsibilities, jurisdiction and mandate.

Early Engagement

- Sixth bullet. "Helps governments identify potential policy gaps that may need attention to support an EA". Addressing policy gaps requires time and resources, clarity needed on how to ensure follow-through of this engagement towards addressing these gaps as part of this revitalization process.

Readiness Gate

What factors/ criteria should be considered for this decision?

- Sixth bullet. Clarity is needed to ensure Health Authorities and related government health and social agencies are included as "EA participants" in the identification of publically posted key issues.
- The availability (or lack thereof) of baseline environmental, health and social data including data specific to Indigenous peoples and communities. Decisions at the readiness gate need to be informed by accurate, up-to-date population-specific environmental, social and health baseline data.

Process Planning

What needs to be included as part of the Assessment Plan?

- Need to clarify if this is where baseline data collection is to occur, or where in the EA process baseline data collection will occur as part of process planning.
- Third bullet. "Information requirements are for positive and negative project effects, and cumulative effects, on the natural and human environment; Indigenous rights and title; and, Indigenous human rights as set out in the UN Declaration, applying best available scientific and Indigenous knowledge". Clarification is needed on what is meant by 'human environment' to ensure inclusive of health and social impacts so the requirements for information gathered support assessment of effects across the 5 pillars.
- Health Impact Assessment should be a standard inclusion as all projects will have some level of positive and negative health impacts. Assessments should be accompanied by appropriate standards and guidance documents to ensure consistency, and which meet the level of international standard (see *Process certainty and predictability*) developed in conjunction with Indigenous communities.

Special Roles in EA

- Third paragraph, Technical Advisory Group. "Representatives with the mandates and technical expertise relevant to the review of a proposed project, including appropriately qualified provincial, Indigenous and community experts and regulators." Reflective of a revitalized Environmental Assessment process that is inclusive of robust health and social impact assessment, required representation on the Technical Advisory Group should include qualified professionals across environmental, health and social disciplines.
- Local governments are referenced as having an important role to play in EA given they provide services (drinking water, housing, medical services) that may be impacted from a project. However, Indigenous communities provide these same services where impacts could be even greater due to the limited resources/tax base to address pressures (e.g housing, medical services, drinking water, potential work camps).

Application Development and Review

What else would give you confidence in the data and studies that inform the EA?

- The inclusion of mechanisms for independent studies and peer review tools is a positive step towards improving confidence in the data and studies that inform EA.
- Third bullet. "All proponent's technical studies would be undertaken by appropriately qualified experts and reviewed by independent experts... e.g through the technical advisory group". As stated above, recommendation is to establish clear professional qualifications, competencies and standards for defining "appropriately qualified" within environmental, health and social impact assessment based on established provincial, Canadian or international guidance/best practices. Management plans should also be included as part of the application to capture and manage risks, such as those related to the spread of communicable diseases.

Effects Assessment and Recommendations

What else would give you confidence in the assessment and recommendations that inform the EA decision? How would you like to be engaged at this stage?

- As outlined previously, the effects assessment and EA decision need to be informed by an EA process conducted using established best practices, standards and principles for EA developed with Indigenous communities, inclusive of health and social impact assessment and include effects management plans to capture and manage risks, such as those related to the spread of communicable diseases.

Post Certificate

What else should be done to ensure projects are in compliance with their certificates?

- Suggestion to clarify the need for EA funding mechanism for Indigenous communities as described previously inclusive of funding for co-administration and participation in monitoring post-certificate.

References

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June 15, 2018

Honourable George Heyman
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Dear Minister Heyman:

Re: Environmental Assessment Revitalization

Thank you for the opportunity to contribute to the Province's effort to revitalize the Environmental Assessment (EA) process. Medical Health Officers (appointed under the BC *Public Health Act*) working in the regional health authorities, and Medical Officers working in First Nations Health Authority have roles and responsibilities with respect to promoting and protecting the health of the communities they serve. We advise local governments and First Nations communities on issues that may affect the health of their populations. Collectively, we have extensive experience in assessing and responding to environmental health hazards and threats. We are regularly called upon by various levels of government as well as communities to assist in risk assessment and risk communication. Together, we and other public health professionals in our health authorities have had extensive experience working with the Environmental Assessment Office (EAO) on a variety of project assessments throughout the province. Based on our experiences, we offer the following recommendations:

1: Ensure that the Revitalized Environmental Assessment Process is holistic, integrated, and comprehensive

The current *Environmental Assessment Act* requires an assessment of the environmental, economic, social, heritage and health effects of a reviewable project (the 5 pillars). However, as presently practiced, the EA process tends to be heavily weighted towards assessing impacts to the physical environment, with less rigor, scope, and sensitivity to health and social impacts. A definition of health consistent with our understanding of the determinants of health is lacking. Similarly sustainable development is implied, but a lack of definition and framework limits the assessment process from fulfilling its intended purpose. We therefore recommend:

- Rename the *Environmental Assessment Act* to *Impact Assessment Act* (or similar) to underscore the need for Government to take a holistic, integrated and comprehensive approach to major project assessments;

- Include in legislation and policy a clear definition of health that is reflective of the World Health Organization's definition of health, our current knowledge of the determinants of health and health equity, and inclusive of the philosophy of health and wellness as defined by BC Indigenous peoples and communities (see *First Nations Perspective on Health and Wellness*);
- Include in policy and guidance clear expectations and approaches to assessing health impacts consistent with the definition of health in a revised legislative framework;
- Include in the legislation and policy a clear definition of sustainable development that gives considerations to net benefit for present AND future generations. Furthermore, incorporating the *United Nations Sustainable Development Goals* (SDGs) and standards such as the World Bank *IFC Performance Standards on Environmental and Social Sustainability* in the assessment framework will help ensure that the revitalized EA process is holistic, integrated and comprehensive;
- Include in policy and legislation the assessment of both positive and negative impacts, with the overall objective of minimizing harms and maximizing positive benefits across the 5 pillars. Recent work in this area, including a *report* summarizing Northern BC First Nation communities engagement on health impacts from resource development and a *report* developed by provincial health agencies on the social determinants of health impacts may assist with this recommendation.
- Implement regional and strategic assessments considerate of cumulative impacts within communities or from a particular industry or sector across space and time in parallel to project-level assessments;
- Strengthen the EA process as a system that effectively acts throughout the life of the project. Once approval has been granted it should continue to confirm assumptions and ensure conditions, appropriate management plans and commitments are not only being followed but continue to align with leading best practices;
- Improve the sensitivity of criteria under the *Reviewable Project Regulation* to impacts outside the environmental pillar; and
- Include in policy and guidance, the need to assess and manage for socio-economic and health-related climate change impacts from reviewable projects.

2: Increase the capacity, expertise, professional qualifications and standards to support a more holistic, integrated and comprehensive assessment process.

A major reason underlying the limited scope often used in assessing health impacts, as currently practiced in the EA process, is the predominance of experts trained in the physical sciences conducting and leading the assessments, both at the proponent and regulatory level. This expertise is then often used to determine social and health impacts, which may be outside of the scope of their training. To be holistic, the EA framework will need to recognize the value that social and health professionals bring to the process. Another limitation is the capacity for local community participation. Local communities are usually the most knowledgeable about potential social and health impacts, however often have limited resources to review applications. The addition of socio-economic and health pillars may further strain this capacity. We appreciate and support the proposal to increase funding to Indigenous communities to ensure they are able to fully participate in EAs. Additional support to non-Indigenous communities is also recommended to ensure meaningful community engagement. A further limitation in the current practice is the lack of sufficient expertise and capacity within governments and allied agencies (especially social and health agencies) to critically review the work of the qualified professionals and participate in the EA process. We therefore recommend:

- Establish clear professional qualifications, competencies and standards for social and health impact assessors;
- Establish clear expectations with respect to inclusion of Indigenous knowledge and expertise in the assessment process
- Provide funding to local communities to meaningfully participate in the EA process for all 5 pillars;
- Provide funding to First Nations and local communities to establish baseline health, socio-economic and environmental data, and to enhance community-specific surveillance systems to enable better assessment of health impacts over time;
- Enhance staffing, expertise and resources within government and health authorities to be able to critically review the work of qualified professionals, participate in the EA process meaningfully and develop guidance and policy to support the EA process.
- Support the development of leading practice guidance and policy for community-level engagement and health and social impact assessment methodologies.

3: Increase the neutrality and transparency of the process to increase public confidence.

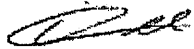
The revitalized EA process that we recommend will require an “all of government” approach. It may therefore be no longer appropriate for the EAO to be located within the Ministry of Environment and Climate Change Strategy, even though the EAO is described as a “significant independent or semi-independent office” in the Ministry’s annual service plan report and is stated to be neutrally administering the EA process. It has also been our collective experience that the EAO has had very uneven success in recruiting participation in the EA process from ministries outside of the natural resources sector (for example, education and social services). The public and stakeholders may also question the neutrality of the process when the project proponent is another ministry and/or the project is one that the Province has announced to be priority. A solid best practice approach to community and stakeholder engagement is also required. Even when an assessment is technically well-done and the conclusions technically reasonable, public confidence in the assessment may be lacking due to inadequate engagement and transparency. Who funds, who directs, and who conducts the assessment are important factors influencing credibility and public trust. We therefore recommend:

- Increase the independence of the EAO visibly and materially within the government through legislation and policy changes;
- Strengthen the cross-government decision-making framework for impact assessments to ensure referral to and participation of ministries with mandates in health, heritage, and economic and social development;
- Identify alternate funding models to ensure a clear separation of the assessment funding role (usually the proponent) from the assessment direction and coordination roles that include recruiting and hiring consultants for conducting assessment;
- Increase the transparency of the Minister’s decision (section 17(3)) by prescribing into legislation the expected format and content (including the Minister’s reasons) of the decision statement;
- Review the public and stakeholder engagement process and time frame to maximize meaningful community and stakeholder engagement (and agreement) on the nature, siting and characteristics of a project; and
- As part of the Provincial Government’s commitment to implement the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), incorporate UNDRIP, inclusive of the principles of Free, Prior, Informed Consent (FPIC), in the processes for determining whether a project is

reviewable, the scope of the review and assessment, as well as the assessment decision. Relevant international guidelines and standards are available.

We make these recommendations with the view that they will support the Province's goal of protecting the environment, supporting sustainable development, advancing reconciliation, and enhancing public confidence and meaningful participation in the EA process. Our staffs are pleased to provide further information to clarify and support each of the aforementioned recommendations. Further dialogue and engagement can be coordinated through Drs. Raina Fumerton (Northern Health Authority) and James Lu (Vancouver Coastal Health Authority).

Respectfully,



Dr. Victoria Lee
Chief Medical Health Officer
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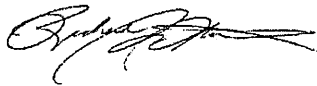
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