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July 30, 2018

BC Environmental Assessment Office

Delivered online:

<https://www.projects.eao.gov.bc.ca/p/environmental-assessment-revitalization/commentperiod/5ad8d5c9166674002447daac>

To whom it concerns:

Thank you very much for the opportunity to respond to your Environmental Assessment Revitalization Discussion Paper. This paper includes many important proposals to help regain public confidence in BC's environmental assessment law. We are heartened by the inclusion of the precautionary principle, the recognition that mitigation needs to be effective, and the acknowledgment that past projects need to inform projects currently under consideration. We would like to provide comment on the following topics:

**1. Strategic/regional assessments to manage cumulative effects and provide opportunity for meaningful public input at the appropriate scale in time and space.**

Strategic/regional environmental assessments are the most obvious and proactive solution to land use conflicts and related flaws in project-level environmental assessments, and we are pleased to see them included in the Discussion Paper. We believe that this level of assessment/planning is the most important forum for public feedback. The Discussion Paper recognizes the need to improve public involvement, but addresses this need at the project scale only. Public appetite for feedback is strongest at the "big picture" landscape or regional scale, and the current, narrowly defined project-scale opportunities for input are one of the main causes of public frustration. We would like to see further detail on and resources for strategic/regional planning, including more information on how the public will be involved. We believe that these planning processes should be led by government based on the need to manage cumulative effects for a region and/or type of activity in a region.

**2. Independent, robust and transparent science.**

We note that the discussion paper includes recommendations for a central repository for data and for data to be publicly available. We would like to see the data made available through a public registry, to help improve baseline data and provide meaningful tracking and avoidance of cumulative project effects.

We would like more detail on the mechanism(s) for independent studies and peer review. Given the frequent issues with proponent-supervised, non-transparent data collection and review, we are in

support of the recommendations for technical review of data collection and analysis before an application is complete. It is important to have initial independent review and agreement on how data will be collected, reviewed, and used in decision making. This should include an understanding of the range of acceptable impacts, and would ultimately inform how and whether a project should proceed. As such, we would like the discussion paper recommendations to be expanded upon to ensure that the methods of data collection, review, and analysis are robust and transparent for all projects. More detail is required regarding how this will happen. We propose that the involvement of independent experts and peer review of proponent evidence be set out in legislation. Alternatively, we are supportive of assessments being conducted under the direct supervision of a central authority.

### **3. Adequate resourcing for monitoring, compliance and enforcement**

Further details on oversight as well as resourcing of commitments for monitoring and compliance are needed in order to determine whether they can be meaningfully implemented. The Discussion Paper does not identify the need to increase funding for monitoring and compliance. Improved compliance tools and better opportunities for engagement in monitoring are less likely to be effective if there are insufficient resources to take advantage of those tools and opportunities. We are strongly supportive of providing resources for First Nations to lead or participate in monitoring the outcomes of projects within their geographic area.

Thank you for the opportunity to provide feedback on this important initiative.

Sincerely,

A handwritten signature in black ink that reads "Aaron Hill". The signature is written in a cursive, flowing style.

Aaron Hill  
Executive Director  
Watershed Watch Salmon Society