



EAO Management Plan Development and Review

EXTERNAL GUIDANCE

VERSION 2.0

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EAO

Environmental
Assessment Office

A stylized illustration of a mountain range and forest. The mountains are depicted with layered, jagged shapes in various shades of blue. At the base of the mountains, there is a line of evergreen trees. The entire illustration is set against a white background, with the bottom of the page transitioning into a solid blue footer.

Version Control History:

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This guidance is intended to facilitate the development and implementation of Management Plans and describe the procedures by which the Environmental Assessment Office receives, reviews and/or approves Management Plans. It is a living document which will be updated to reflect the development of related guidance materials and supporting resources, changes in the processes described herein, and/or feedback received from its users. It is not advice and does not replace the Requirements of the Environmental Assessment Act (2018) or its Regulations nor does it bind any decision-maker.



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Acronyms and Abbreviations

The Act / EAA	<i>Environmental Assessment Act</i>
BC	British Columbia
BC-CEA	BC Compliance and Enforcement Agency
CPD	Certified Project Description
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
ENV	Ministry of Environment and Parks
EPD	Exempted Project Description
IEM	Independent Environmental Monitor
PDOT	Post-Decision Oversight Team
QP	Qualified Professional
QPerson	Qualified Person
TOC	Table of Conditions

Definitions

Adaptive Management: An iterative process for improving mitigations and management practices over the life of a project by evaluating monitoring results and the effectiveness of mitigations, and using what is learned to refine approaches and better achieve plan objectives.

Amendment: Any modification to an existing Environmental Assessment Certificate or Exemption Order, including to the Certified Project Description or Table of Conditions, or equivalent documents.

Approval: Where a Condition requires EAO Approval of a Management Plan, the EAO provides Approval following review and confirmation that all Requirements have been fully met. Approval is typically required when there is a limitation to a plan's implementation or commencement of a phase (e.g., "the project may not commence Construction until the plan has been approved by EAO").

Certified Project Description: The legally binding description of a project included in an Environmental Assessment Certificate, including all project components and activities, their locations, and associated constraints. The Holder must design, build, operate and decommission (if applicable) the project in accordance with both the Certified Project Description and the Table of Conditions.

Conditions: Legally binding terms set out in an Environmental Assessment Certificate or Exemption Order which describe how the project is to be implemented, and which must be adhered to throughout the life of the project. Conditions may include standard Requirements common to most projects, or Requirements intended to prevent or mitigate project-specific effects.

Consultation: Refers to the specific process for consultation undertaken by Holders in the development of Management Plans, or other documents, as outlined in a Project's Consultation Condition.

Consulted Party: A party identified in the Conditions of an Environmental Assessment Certificate or Exemption Order with whom the Holder must consult on the development of one or more Management Plans, reports, or other documents with. May include First Nations, local governments, regulatory agencies, or any other groups or organizations as specified in the Environmental Assessment Certificate or Exemption Order.

Environmental Assessment: An assessment of a project's potential environmental, social, economic, health and cultural effects and effects to First Nations and their rights, pursuant to the [Environmental Assessment Act](#).

Environmental Assessment Certificate: An Environmental Assessment Certificate (EAC) is issued when a reviewable project is approved under the *Environmental Assessment Act*. Receiving an EAC allows the project to proceed to permitting and other regulatory authorizations. Includes both the Certified Project Description and Table of Conditions as Appendices.

EPIC: EAO's [Project Information Centre](#). A public database of all documents associated with projects that have been involved in an Environmental Assessment (EA) in B.C.

EPIC.submit: An [online portal](#) designed specifically for Holders to manage all documentation requirements in the post-authorization phase of the Environmental Assessment process. It provides a centralized platform where Holders can submit management plans, track submission status, and maintain document version control.

Exemption Order: A legal order under the *Environmental Assessment Act* that allows a Reviewable Project to proceed without an Environmental Assessment Certificate provided the project is constructed, operated and decommissioned in accordance with the Exemption Order.

Holder: A person or organization (e.g., a corporate entity, First Nation, or federal, provincial or local government) to whom an Environmental Assessment Certificate or Exemption Order has been issued, or, if the Environmental

Assessment Certificate or Exemption Order has been transferred in accordance with Section 33 of the *Environmental Assessment Act*, the person or organization to whom it has been transferred.

Independent Environmental Monitor: An environmental specialist, typically a Qualified Professional, who is retained by the Holder of an Environmental Assessment Certificate or Exemption Order. An Independent Environmental Monitor verifies compliance with the Environmental Assessment Certificate or Exemption Order and reports their findings directly to the EAO.

Management Action: An action or process described in a Management Plan (e.g., mitigation measure, monitoring program, adaptive management, etc.). Management Actions are implemented to achieve the plan objectives.

Management Plan: A document developed and implemented by the Holder of an Environmental Assessment Certificate or Exemption Order, as per the Requirements set out by an associated Condition in the Table of Conditions. The document sets out how the Holder will implement, monitor, and maintain compliance with the relevant Requirements, and describes how potential impacts identified in the Environmental Assessment will be mitigated.

Qualified Person: An individual with the education and experience to provide reliable advice, opinions, or decisions associated with the management of a specific category of project effects, as determined by the Requirements set out in the applicable EAC Condition. Identification and engagement of appropriately Qualified Persons is the responsibility of the Holder.

Qualified Professional: An individual who: is registered and in good standing with a professional organization in British Columbia constituted under an Act; who has the training, experience, and expertise in a discipline relevant to the management of a specific category of project effects; and who is acting within their area of expertise, under their professional organization's code of ethics, and subject to that organization's disciplinary action. Identification and engagement of appropriately Qualified Professionals is the responsibility of the Holder.

Requirement: An action, objective, or supporting information a Holder must implement, identify or otherwise address, including all components of Conditions, and all commitments made in Management Plans.

Review: Where a Condition requires EAO Review of a Management Plan, the EAO provides notification following review and confirmation that all Requirements have been fully met. Plans that are submitted for review typically do not require EAO confirmation prior to implementation or do not restrict a Holder from moving into a phase of the project (e.g., Construction) unless otherwise indicated by the Condition.

Table of Conditions: A list of legally binding terms set out in an EAC or Exemption Order to which the Holder must adhere throughout all project phases.

Valued Component: A component of the natural or human environment considered by the Holder, public, First Nations, scientists or technical specialists, or government agencies that were involved in the Environmental Assessment process to have scientific, ecological, economic, social, cultural, archaeological, historical, or other importance.

Management Plan Development and Review

GUIDANCE FOR HOLDERS TO SUPPORT DEVELOPMENT OF MANAGEMENT PLANS AND NAVIGATION OF THE EAO'S MANAGEMENT PLAN REVIEW PROCESS

1.0 PURPOSE OF THIS GUIDANCE

This document provides guidance intended to support Holders in developing and implementing Management Plans by providing additional details on EAO's expectations and processes. This guidance has been developed, and will be updated, in accordance with EAO's current best practices and drafting instructions for EACs. If there are discrepancies or inconsistencies between this guidance and an EAC, the EAC takes precedence.

While this guidance is intended to be broadly applicable to a wide range of Management Plans and related EAC documents (e.g., terms of engagement, terms of reference, reports), it is important to be aware that some content may not be applicable in all circumstances, for instance, under older EACs and that this is not a binding policy document. This guidance is meant to be informative about the EAO's Management Plan review process and includes recommendations on best practices for Management Plan development.

The processes outlined in this guidance have been implemented by the EAO since 2024 and will continue moving forward. This document received extensive updates in 2026 following engagement with Holders and Consulted Parties.

This document provides clarity regarding the following frequently asked questions:

- What are Management Plans? (**Section 2**)
- What are the key components of Management Plans? (**Section 3**)
- How is Consultation conducted and evaluated for Management Plans? (**Section 4**)
- How does the EAO review Management Plans? (**Section 5**)
- How does the Holder implement Management Plans in accordance with their EAC? (**Section 6**)

If further clarification is necessary, contact the EAO at EAO.ManagementPlanSupport@gov.bc.ca.

An index of additional resources related to Management Plans is provided in **Appendix A**.

2.0 OVERVIEW OF MANAGEMENT PLANS

2.1. Regulatory Context of Management Plans

In accordance with the Act, the Minister responsible for the EAO may issue the Proponent (defined in [the Act](#)) of a reviewable project (defined in the [Reviewable Projects Regulation](#)) either an EAC or Exemption Order (EO). EACs and EOs are regulatory instruments that identify legally binding Requirements for the design, construction, operation, and decommissioning of a project.

Holders are responsible for conducting the project in accordance with the applicable EAC or EO. This includes compliance with both the Certified Project Description (CPD) or Exempted Project Description (a CPD equivalent which applies to projects with EOs) and the Table of Conditions (TOC). Conditions identify the Requirements for project implementation and may include Management Plans. Mitigation measures may be embedded within the CPD, required through TOC conditions directly, or cite part of the application in the Conditions, depending on how they are specified in the EAC.

Throughout this document, references to EACs include Exemption Orders, and references to Certified Project Descriptions also apply to Exempted Project Descriptions.

The TOC typically includes the following types of Conditions:

- Standard Conditions (**Section 2.3.1**) applicable to most contemporary EACs, some of which include Requirements for all Management Plans or processes that the Holder or EAO must follow;
- Project-specific Conditions requiring the development of Management Plans, reports, or other documents that detail the implementation of mitigation measures or monitoring related to one or more Valued Components (e.g., Air Quality Management Plan, Health and Medical Services Plan); and
- Conditions requiring the implementation of specific mitigations or processes (e.g., public communications) that are not a component of Management Plans.

For some projects, Holders may choose to include requirements from other regulatory authorities (e.g., federal agencies or sector-specific provincial regulators) in a single Management Plan. In these cases, Holders are responsible for ensuring compliance with all applicable requirements across jurisdictions. While the EAO may coordinate with other regulators where possible, regulatory requirements, processes and outcomes may differ. Where EAC Amendments change applicable Conditions, Holders may be required to update Management Plans to maintain alignment.

Figure 1 provides an overview of the regulatory context of Management Plans.

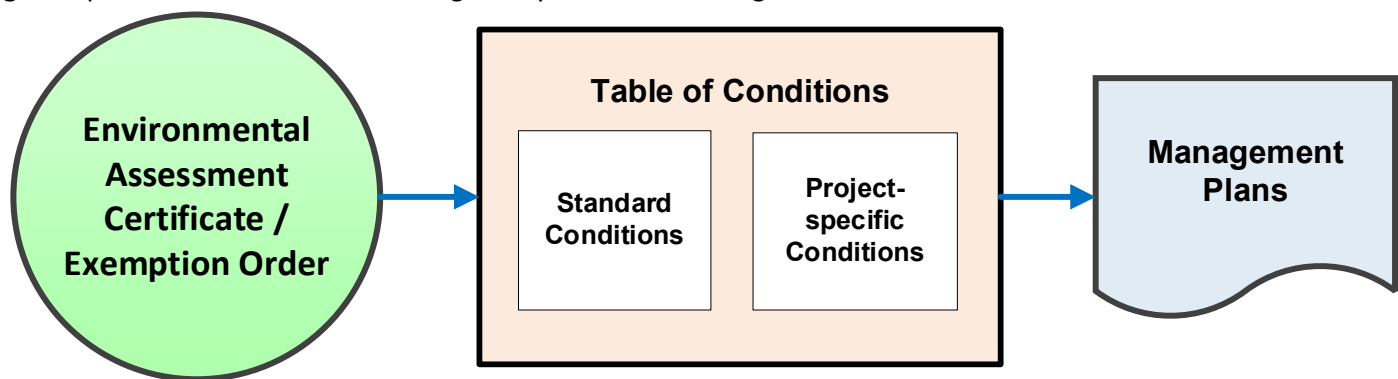


Figure 1, EAO, 2026, Regulatory Context of Management Plans.

More information regarding EACs is provided in the [Environmental Assessment Certificate Policy](#).

2.1.1 Professional Reliance Model

Management Plans are typically required to be developed by a Qualified Professional (QP) or Qualified Person (QPerson; as specified in the Condition) operating within their applicable area of practice. This reflects the professional reliance model that underlies natural resource management in B.C., in which government sets the objectives or results to be achieved, and professionals hired by proponents decide how those objectives or results will be met.

Under Section 29(4) of the Act, Ministers may attach Conditions to an EAC requiring a Holder to develop a Management Plan to mitigate a predicted adverse effect, monitor effects on a Valued Component, or achieve some other objective. Once a Management Plan is submitted, EAO undertakes a compliance verification process (see **Section 5.0**) to confirm the Holder has met the relevant Condition Requirements. This review considers whether the plan addresses all stated Condition requirements (including any Requirement that it be developed by a QP/QPerson), whether required consultation has occurred and been considered, and whether the plan uses clear, enforceable language. The EAO's review does not typically extend to the technical merits of the Management Plan submitted by the Holder.

2.2. Purpose of Management Plans

Management Plans are regulatory tools required by EAC Conditions, that are intended to mitigate potential adverse project effects identified during an EA. Management Plans may help address uncertainty during the EA process by providing flexibility regarding how adverse effects will be mitigated (e.g., where additional consultation is required, project design information is limited, or post-decision permitting requirements are unknown). Management Plans typically detail *how* work on a project is done, but not *what* work is done. They are also typically not intended to adjudicate issues or address new Valued Components not assessed during the EA process.

Management Plans are a key mechanism by which Holders detail how Management Actions (e.g., mitigation measures, monitoring and adaptive management) will be implemented to achieve the desired outcomes of a project.

Management Plans are living documents capable of:

- Responding to changes in project activities (provided the changes are within the scope of the project authorized by the EAC);
- Adapting mitigation measures due to lack of baseline, effectiveness and/or monitoring data, in accordance with the plan's Adaptive Management process; and
- Adjusting in response to feedback from, and engagement with, Consulted Parties.

This provides Holders the flexibility necessary to implement projects in accordance with the Conditions of their EAC.

2.3. Conditions and Requirements

Conditions use specific and deliberate language to identify the Requirements that Holders must address. Holders are responsible for achieving and maintaining compliance with each Condition (i.e., fully addressing its Requirements), regardless of any internal or contractual delegation of responsibility. Conditions outline Management Plan Requirements, which are the minimum content that Holders must include.

Requirements are the items listed in Conditions that the Holder must address in their Management Plans.

2.3.1 Standard Conditions

Contemporary EACs include standard Conditions for Management Plan development, consultation, and review. Note that the titles and contents of these Conditions may vary depending on the context of the project and the timing of when the EAC was issued. The following descriptions are meant to provide a general overview of content in standard Conditions related to Management Plans, which include but are not limited to:

Document Review

- Allows the EAO to review and respond to documents (including Management Plans) submitted by the Holder, often within a timeframe identified in the Condition.
- Following the EAO's review, the Holder is notified of the review findings and resulting next steps.

Document Updates / Implementation

- Allows the EAO to require or the Holder to propose changes to Management Plans under specific criteria within the Condition (e.g., Condition Requirements are not being met, objectives not being achieved, there are changes in best practices/technology).

Document Development

- Identifies the minimum content Requirements for documents required by the EAC, including Management Plans.
- Identifies the required components of a Management Plan's monitoring program.
- Identifies the required components of a Management Plan's adaptive management strategy.

- Alternatively, these may be identified in a separate Adaptive Management Condition (also sometimes referred to as a Trigger-Response Condition).

Consultation

- Identifies the Consultation Requirements for development and implementation of a Management Plan. Holders must consult with all parties listed in the Management Plan Condition (or as otherwise identified in the TOC) and demonstrate that the process is consistent with each Consultation Requirement.
- Describes the record of consultation the Holder is required to maintain and provide to the EAO when submitting a Management Plan and/or upon request.

2.3.2 Management Plan Conditions

Management Plan Conditions require the development and implementation of Management Plans. These Conditions often include, but are not limited to, the following types of Requirements:

- The plan must be developed and implemented by a Qualified Professional (QP) or Qualified Person (QPerson) with the requisite education, experience, and qualifications (as specified by the Condition).
 - Note: Personnel with construction or operations experience may support development of components of the plan, provided the QP/QPerson is ultimately responsible for drafting and approving the plan.
- The plan must be developed in Consultation with Condition specified Consulted Parties.
- The plan must identify measures to mitigate and monitor potential adverse effects associated with the specific activity, Valued Component, or constraint.
- The plan must be submitted in accordance with any stated timeline relative to a specific project milestone and in consideration of any EAO Review or Approval Requirements.

Holders should carefully examine the Requirements identified in all applicable Conditions, noting the specific language used. Conditions are structured such that words and grammar have ordinary meaning unless otherwise defined and must be read in conjunction with the entire Table of Conditions (e.g., relevant standard Conditions and listed definitions).

2.4. Roles and Responsibilities

2.4.1 Holders

Holders are wholly responsible for the development and implementation of Management Plans and associated consultation activities, in accordance with the Conditions of their EAC. Holders are ultimately responsible for the contents of the Management Plan and maintaining compliance with their EAC. This includes responsibility for any QP/QPersons (see **Section 2.1.1 Professional Reliance Model**) involved in the consultation, development, and implementation of the Management Plan, contractors or subcontractors, or any other personnel working on the Project or for the Holder.

2.4.2 Consulted Parties

Holders are required to provide Consultation opportunities to all Consulted Parties listed in relevant Conditions related to the Management Plan being developed. Consulted Parties may be involved in consultation or ongoing engagement during plan development or plan implementation; they may review reports submitted by the Holder; and/or may provide input on plan updates, as required by the relevant Condition.

If Consulted Parties have changed names or functions since the EAC was issued, or the Holder is having difficulties contacting Consulted Parties, Holders may contact the EAO to confirm contact details of Consulted Parties at EAO.ManagementPlanSupport@gov.bc.ca.

2.4.3 EAO and ENV Teams

The EAO is responsible for reviewing/approving Management Plans and associated documents and providing regulatory oversight during the implementation of Management Plans in accordance with the Conditions of Holders' EACs. The EAO may also act as a resource for Holders and Consulted Parties by clarifying these processes and providing guidance regarding issues which may arise during plan development. Please note that the EAO does not attend Consultation activities and/or draft Management Plans on behalf of Holders.

In January 2024, the EAO formally established a dedicated team responsible for developing and administering a standardized and transparent process for the development and review of Management Plans. Before a Management Plan is implemented, the EAO conducts a review for compliance verification to ensure it fully addresses the Requirements of all Conditions relevant to the plan.

As of June 2026, EAO Compliance & Enforcement has joined the BC Compliance and Enforcement Agency (BC-CEA); a centralized compliance and enforcement agency within the Ministry of Environment and Parks (ENV). During plan implementation, BC-CEA verifies compliance via inspections, investigations, and/or required reporting submitted by the Holder. If the Holder is found non-compliant with any of the Conditions of their EAC, the BC-CEA determines the appropriate enforcement response.

Table 1 provides an overview of the common roles and responsibilities of parties involved in the development, review and implementation of Management Plans. This list is not intended to be exhaustive.

Role	Responsibilities Relative to Management Plans
EAO	
Post-Decision Oversight Team (PDOT)	Verify that plan consultation Requirements have been met; review the plan prior to implementation or following updates, including providing instructions and comments where revisions are required. Provide guidance to Holders on EAO processes and potential issues that may arise during consultation or plan development.
Operations Project Team	Facilitate changes to EACs (e.g., amendments, transfers, etc.), including changes to the CPD or TOC, which may impact Management Plans.
Ministry of Environment and Parks (ENV)	
BC Compliance and Enforcement Agency (BC-CEA)	Verify and enforce ongoing compliance with EAC Conditions and Management Plans throughout implementation across all phases of a project.
Holder and Contractors	
Holder	Develop and implement plan in accordance with EAC Conditions; ensure staff and contractors acting on their behalf are sufficiently trained and understand their responsibilities as described in the plan(s).
Qualified Professional	Support plan development, implementation, and updates by providing subject matter expertise in a discipline where they hold the skills, training and experience expected of a professional experienced in that area of practice and designation with a relevant self-regulating professional association.
Qualified Person	Support plan development, implementation, and updates by providing subject matter expertise in a discipline where they hold the skills, training and qualifications expected of a specialist experienced in that area of practice.
Contractors & Subcontractors	Implement mitigation measures, monitoring, reporting, etc. under plans, as contracted to by the Holder.

Role	Responsibilities Relative to Management Plans
Independent Environmental Monitor	Verify compliance with EAC Conditions throughout plan implementation and report findings directly to the BC-CEA and EAO. Although contracted by the Holder, the IEM does not report to them. Independent Environmental Monitor (IEM) responsibilities are identified in an IEM <i>Terms of Engagement</i> .
Consulted Parties (as determined by Condition)	
First Nations	Support plan development and updates through the Consultation process, and, if specified in the EAC, may be involved in plan implementation and monitoring.
Local Governments	Support plan development and updates through the Consultation process, and, if specified in the EAC, may be involved in plan implementation and monitoring.
Provincial or Federal Government Ministries/Departments/Agencies	Support plan development and updates through the Consultation process, and, if specified in the EAC, may be involved in plan implementation and monitoring.
Other Groups, Organizations, or Stakeholders	Support plan development and updates through the Consultation process, and, if specified in the EAC, may be involved in plan implementation and monitoring.

Table 1, EAO, 2026. Roles and responsibilities of parties involved in Management Plan development, review and implementation.

3.0 MANAGEMENT PLAN CONTENT

The Management Plan Condition and all applicable standard Conditions determine the Requirements for a given Management Plan's content. Holders should reference the list of definitions provided in the TOC to ensure they understand the terms used in each Condition.

This section provides guidance regarding the following key components of Management Plan content:

- Purpose and objectives, including scope and relationship to other plans, and how the plan addresses EAC Conditions and associated regulatory constraints (**Section 3.1**)
- Expectations and requirements for enforceable and accountable language used throughout Management Plans (**Section 3.2**)
- Management Actions that will be implemented to achieve plan objectives, including:
 - Mitigation measures (**Section 3.3**)
 - Monitoring programs (**Section 3.4**)
 - Adaptive management and/or trigger response (**Section 3.5**)
- Baseline data or information that will inform the implementation of the Management Actions (**Section 3.4.1**)

3.1. Purpose, Scope and Objectives

Each Management Plan must clearly state its purpose and the objectives it is intended to achieve. These objectives provide the basis against which the effectiveness of the plan's Management Actions can be evaluated and should be specific enough for Holders and the EAO to assess whether the plan is achieving its intended outcomes once implemented.

Management Plans must be scoped to address all applicable Requirements and clearly identify relationships to related plans or other supporting documents. To avoid repetition and limit potential redundancies associated with consultation and / or review of updated plans, Holders may reference related plans or documents that address some Requirements rather than repeating content in multiple plans. Cross-references must be specific enough for the EAO to verify that plan

Requirements are fully addressed (e.g., specific section(s) / sub-section(s) number and name that identify the Management Action(s) that meet an individual Requirement). References are acceptable under the following situations listed below.

- **EAC-associated Management Plans:** The reference must be to a Management Plan, which was also submitted to EAO under the Conditions of the same EAC.
- **Other Plans, Permits, or Authorizations:** Cross-references to non-EAC plans or permits / authorizations associated with other regulatory authorities may be used, as long as the cross-reference is specific (as above). However, the cross-referenced plan must be provided to EAO as an appendix to related Management Plan or must be easily available to the public and accompanied by a website linking to the cross-reference. Sufficient detail must also be provided within the Management Plan itself to fully explain how the cross-referenced document meets the Requirements of the Condition.
- **Publicly available Guidance and Policy:** Cross-references to publicly available guidance and policy documents (e.g., federal guidance on wetlands, ENV guidance on offsetting, etc.) are permitted, as long as the cross reference is specific (as above) and the relevant details related to the Management Plan are described in the plan itself. References to these documents can only be made when the document is referenced in the Condition. The references to these documents do not replace or diminish the responsibility to develop and implement the Management Plan as required by the EAC.

3.1.1 Table of Concordance

A Table of Concordance identifies the Management Plan content, which addresses each Requirement. Although a Table of Concordance is not typically required, it can expedite the EAO's review process as it helps ensure all Requirements are addressed and allows users to rapidly navigate to the relevant section(s) of the plan. To provide additional clarity, the EAO recommends including a summary of the plan content and describing how it addresses the relevant Requirements. A simplified example of a Table of Concordance is provided in **Table 2**.

Holders can use a Table of Concordance to identify and/or summarize the Management Plan content that addresses each

Condition No.	Requirement	Relevant Plan Section(s)
2 (a)	Purpose and objectives of the plan, program or other document;	Section 2.1 Purpose and Objectives of Plan
2 (b)	Roles and responsibilities of the Holder, Project personnel and contractors;	Section 2.2 Roles and Responsibilities
2 (c)	Names and if applicable, professional certifications and professional stamps / seals, for those responsible for the preparation of the plan, program or other document;	Section 1.1 Plan Authors
2 (d)	Schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 2.3 Implementation Schedule
2 (e)	Means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 5.2 Monitoring Methods Section 5.3 Monitoring Schedule
2 (f)	Adaptive management plan to address effects of the Project if monitoring shows that those effects:	Section 6.0 Adaptive Management Section 6.1 Corrective Actions

	i. Are not mitigated to the extent contemplated in the Application; or ii. Are not predicted in the Application;	Section 6.2 Contingency Measures
2 (g)	Schedules and methods for the submission of reporting to specific agencies, First Nations and the public, and the required form and content of those reports; and	Section 7.1 Reporting
2 (h)	Process and timing for updating and revising the plan, program or other document, including any consultation with agencies and First Nations that would occur in connection with such updates and revisions.	Section 8.1 Revisions and Updates Section 1.2 Consultation
4 (a)	Mitigation measures to minimize effects to water quality during In-Water Works, including measures to minimize sediment dispersion;	Section 4.2 Erosion and Sediment Control Appendix A Table of Mitigation Measures
4 (b)	How the Holder will implement the mitigation measures set out in Section 1.2.3 (the In-Water Works Management Plan) of the Application;	Section 4.1 Mitigation Overview Section 5.1 Water Quality Monitoring Appendix A Table of Mitigation Measures
4 (c)	Mitigation measures to manage potential effects to water quality during dredging, including a water quality monitoring program for turbidity with decision criteria and Management Actions;	Section 4.2 Erosion and Sediment Control Section 5.1 Water Quality Monitoring Appendix A Table of Mitigation Measures
4 (d)	Monitoring in accordance with the BC Water Quality Guidelines: Aquatic Life, Wildlife & Agriculture (BC WQG; August 2024, or as amended from time to time);	Section 5.1 Water Quality Monitoring Section 5.2 Monitoring Methods
4 (e)	How the Holder will identify, document and report any exceedances of the BC WQG to Regulatory Agency 1, and measures to remedy the exceedances;	Section 5.1 Water Quality Monitoring Section 7.1 Reporting Appendix A Table of Mitigation Measures

Table 2, EAO, 2026. Simplified example of a Table of Concordance.

3.2. Language Used in Management Plans

For Management Plans to effectively mitigate adverse effects, they must clearly identify how Management Actions will be implemented, and the objectives they are intended to address. For BC-CEA to verify compliance with EAC Conditions, the language used in plans must be clear, measurable and accountable, leading to plans that are enforceable and not open to different interpretations. This includes describing the planned measures, when and where they will be implemented, and how response actions will be identified and implemented if adverse effects are not mitigated to the extent anticipated.

For the BC-CEA to verify compliance, Management Plans must clearly communicate both the plan objectives and the Management Actions that will achieve them.

3.2.1 SMART Language

The EAO recommends careful consideration of the language used in Management Plans and expects application of the **SMART** principles, described as follows:

- **Specific** – Precise and clear descriptions using unambiguous words and phrases that make it easy to determine whether the Requirement has been met.
- **Measurable** – Terminology that allows readers to determine whether the Requirements have been met, including metrics or measures to quantify and track the status of objectives / Management Actions.
- **Attainable** – Achievable objectives that will be reached by the implementation of practical and realistic Management Actions.
- **Relevant** – Accurate and representative targets or indicators to track the performance of Management Actions at achieving plan objectives.
- **Timebound** – Timeframes, schedules, or deadlines (e.g., relative to project milestones), to provide temporal limits to implementation of Management Actions and achievement of objectives.

SMART language principles facilitate precision in Management Actions and support commitments to achieve objectives. Management Plans that adhere to the SMART principles, providing specific descriptions of required content and clearly identifying the personnel responsible for decision-making, better enabling Holder to fully address their EAC Requirements.

3.2.2 Language to Avoid

Language that is ambiguous or open to interpretation may impact the enforceability of compliance points, create ambiguity for Holders, and is not permitted in Management Plans. Using clear, measurable, and specific language provides the following benefits:

- Facilitates the implementation of Management Plans as intended;
- Streamlines the EAO's Management Plan review process;
- Supports the Holder's ability to track the status of Management Plan Requirements; and
- Mitigates the potential for challenges regarding compliance/enforcement and other regulatory constraints.

3.2.2.1 Words / Phrasing that may result in Ambiguity

Some commonly used words or phrases cannot be fully understood unless specifically defined (e.g., “significant”, “numerous”, “small”, “considerable”, “slight”, “robust”, “flexible”, and “user-friendly”). Use these words and phrases with caution, and always in conjunction with quantifiers, qualifiers or definitions that provide a precise understanding of their intent. An example of ambiguous phrasing in comparison to an unambiguous alternative is provided below.

~~“If elevated turbidity is observed, additional robust erosion control measures will be implemented.”~~

If turbidity exceeds the BC Water Quality Guidelines for a period of one-hour or greater, the designated QP will select and implement one or more of the contingency erosion and sediment control measures described in Section X.Y.

3.2.2.2 Words / Phrasing that may result in Inconsistency

Using multiple words to describe a single concept (e.g., “project area”, “site” and “footprint”) can cause confusion, particularly where different words have different legal meanings. Select one option and use it consistently throughout the Management Plan or define each distinct term. An example of inconsistent phrasing in comparison to a consistent alternative is provided below.

~~“Water quality monitoring will be initiated downstream of the project footprint in the event that visibly turbid water is observed at any of the site’s designated sampling locations.”~~

“Water quality monitoring will be initiated downstream of the project footprint in the event that visibly turbid water is observed at any of the project footprint’s designated sampling locations.”

3.2.2.3 Words / Phrasing that may result in Unenforceability

Unenforceable language lacks clarity, measurability and accountability, and may result in uncertainty over whether Management Plan commitments are met (e.g., whether a trigger / threshold will result in a specific response action). Inclusion of such language in Management Plans must be carefully considered and accompanied by definitions and / or designation of decision-making responsibility to determine how it will be interpreted (e.g., via the introduction of flexibility described in **Section 3.2.3**). An example of unenforceable phrasing in comparison to an enforceable alternative is provided below.

~~“Best efforts will be made to avoid the mobilization of sediment-laden water into Watercourse 1.”~~

“The mobilization of sediment-laden water into Watercourse 1 will be mitigated by the implementation of the erosion and sediment control measures described in Section Y.Z.”

Examples of words and phrases that *may* lack clarity, measurability, or accountability are provided in **Table 3**.

Words and Phrases that Lack Clarity, Measurability, or Accountability		
Where practicable / practical	Feasible	Preliminary
Approximately	Subject to change	Typically
If / As / Where necessary / required	Estimate	If / As / Where appropriate / warranted
Best efforts / Reasonable efforts	Generally	Within the vicinity
Avoid	Reduce / Minimize	May / Should
To the extent possible	As soon as possible	Normally

Table 3, EAO, 2026. Examples of words and phrases that may lack clarity, measurability, and / or accountability when used in Management Plans.

3.2.3 Introducing Flexibility Where Needed

Management Plans can provide the flexibility necessary for realistic implementation without compromising the clarity and / or specificity of the Management Actions. If flexibility is required to mitigate uncertain or unanticipated circumstances, flexibility can be tied to a specific decision-maker whose role is defined in the Management Plan, or an “if-then” approach may be used.

See **Section 3.5** for more information on adaptive management and trigger response for Management Plans, both of which can also introduce flexibility.

3.2.3.1 Decision-making Accountability

Decision-making accountability should be designated to the individual/role responsible for management decisions, describing their authority to provide direction, the personnel they will direct, and the associated monitoring and reporting responsibilities. Decision-making accountability is applicable to both routine circumstances with expected variables (e.g., wet-weather shutdowns), and to unpredictable circumstances with uncertain outcomes (e.g., accidents, malfunctions, or emergencies). If implementation oversight from a QP/QPerson is a Requirement, this individual should be involved in the implementation of response actions and conducting associated investigations. They should also determine when Adaptive Management changes can end and standard operations can resume, if applicable. An example of decision-making accountability is provided below:

“If an exceedance of the BC Water Guidelines persists for over 24 hours despite the implementation of the

mitigation measures described in Section 4.5.6, then the Environmental Monitor will contact the Qualified Professional to determine and implement the appropriate measure(s) to mitigate continued adverse effects to the aquatic environment in accordance with the response actions described in Section 7.8.9.”

3.2.3.2 Options

Options can be provided for a given mitigation or Management Plan action, so long as both / all actions have the same outcome or achieve the same objective. For example, the following mitigation allows for flexibility between two options, however both options have the same effect in protecting worker health:

~~“Where possible, each employee will have a set of their own tools throughout the duration of their shift.”~~

“Where possible, each employee will have a set of their own tools throughout the duration of their shift. When not possible, the shared tools and equipment will be wiped down and cleaned with a disinfecting agent such as a wipe or cleaner after use.”

3.2.3.3 “If-then” Statements

“If-then” statements can be used to identify the circumstances under which an additional or alternative mitigation measure will be implemented. Using this approach requires clear identification of the circumstances under which such measures will be implemented, who is responsible for their implementation, and the required documentation or reporting. An example of an “if-then” statement used in a Management Plan is provided below:

“If the described erosion control mitigation is ineffective, then the designated Qualified Professional will select and implement alternative erosion control measure(s) consistent with the Requirements and Best Management Practices for Making Changes In and About a Stream in British Columbia (Government of British Columbia 2022), with rationale for the change, monitoring of indicators, and resulting outcomes to be documented in daily monitoring reports.”

See **Section 3.5.2** for more information on “if-then” approaches in Management Plans as part of Adaptive Management.

Table 4 includes further examples of Management Actions that have been changed to be clear, measurable and accountable.

Before	After
[The Holder] will call upon Qualified Professionals with relevant expertise to assist with tending to the wildlife as needed .	[The Holder] will call upon Qualified Professionals with relevant expertise to assist with tending to wildlife if it has been covered by oil or another hazardous substance as a result of a spill .
Ground disturbance in the immediate vicinity must be suspended at once, including the movement of soil from the vicinity of the site and any adjacent spoil material.	Ground disturbance within 50 m of a chance find must be suspended at once, including the movement of soil from the vicinity of the site and any adjacent spoil material.
Explosives will be inspected regularly to verify that they are stored and handled safely.	Explosives will be inspected weekly to verify that they are stored and handled safely.
The Incident Commander will contact the Community Liaison Communication Coordinator to appropriately communicate the events to the local communities as necessary .	The Incident Commander will contact the Community Liaison Communication Coordinator to appropriately communicate the events to the local communities as directed by the Medical Health Officer .

Table 4, EAO, 2026. Examples of Management Actions that have been changed to be clear, measurable and accountable.

3.3. Mitigation

The Act defines mitigation as any action that offsets the potential adverse effects of a project. Mitigation may include enhancement actions that deliberately attempt to achieve positive outcomes, or practical measures to avoid, minimize, restore on-site, or offset the potential adverse effects of a project.

The application of mitigation is done hierarchically, using an approach that prioritizes preventing or avoiding adverse effects over managing their consequences. All feasible measures should be considered and applied at each level of the hierarchy before moving to the next. The mitigation hierarchy is described below:

1. Avoid impacting values and associated components.
2. Minimize adverse impacts to values and associated components.
3. Restore values and associated components where effects have occurred.
4. Offset residual adverse impacts to values and associated components.

“Offset” means to counteract, or make up for, an impact on an environmental component that cannot be adequately addressed through other mitigation measures in the hierarchy.

Standardized and/or previously implemented measures (e.g., measures included in government-issued guidance documents and industry/regulatory best-management practice manuals) are preferred over innovative measures due to their proven efficacy.

Management Plans must describe mitigation measures such that the manner of application, extent, timing, frequency, and specificity to the relevant project effects are clear (e.g., design information and figures, necessary equipment, and technical operating procedures). Mitigations may be specified in EAC Conditions and/or the EA application; Management Plans may include additional measures necessary to achieve objectives. An example of mitigation described in a Management Plan is provided below:

“Every two hours, dredging will be halted for 30 minutes to allow sediment to disperse prior to resuming in-water works. The frequency or duration of work breaks may be adjusted in response to the results of water quality monitoring, as determined by a Qualified Professional.”

More information regarding the development and implementation of mitigation measures is provided in the [Policy for Mitigating Impacts on Environmental Values \(ENV 2014\)](#) and [Procedures for Mitigating Impacts on Environmental Values \(ENV 2014\)](#).

3.4. Monitoring

In accordance with the Document Development Condition, Management Plans that include monitoring must typically include the following:

- The baseline information that will be used to support evaluation of mitigation measure effectiveness;
- The methods, location, frequency, timing and duration of monitoring activities;
- The scope, content and frequency of monitoring reports; and
- How the monitoring results will be used to inform mitigation measure effectiveness and, if needed, subsequent adaptive management practices.

Monitoring is an activity designed to inform the implementation and effectiveness of the selected mitigation measures and/or track performance relative to the established targets. When assessed in comparison to the plan’s objectives, the

results of monitoring allow Holders and the EAO to verify that Management Actions are effective at mitigating project effects.

Monitoring should be designed specifically for this purpose, with sufficient rigour to quantify the level(s) of change relative to baseline conditions (i.e., in the absence of project effects). Monitoring should aim to statistically control for unrelated influences, and should consider practicality, achievability, and the analysis methods that will be used. An example of monitoring described in a Management Plan is provided below:

“The water quality monitor will record and document turbidity, temperature, pH, conductivity, and dissolved oxygen every two hours at water quality monitoring stations 1, 2, and 3, and every four hours at water quality monitoring stations 4 and 5. Any deviations from this schedule will be documented by the QP in the monthly report with supporting rationale.”

3.4.1 Baseline Information

Management Plans that include monitoring Requirements must clearly identify the baseline information that will be used in conjunction with the results of monitoring to inform the evaluation of mitigation measure effectiveness. The baseline information referenced must be relevant to the indicators established to track performance relative to the plan’s objectives, establishing the status of the identified Valued Components or constraints prior to exposure to project effects.

Management Plans must describe the baseline information which will be compared to the monitoring results to inform the evaluation of mitigation measure effectiveness. Baseline information may include existing data (e.g., technical reports prepared to support the EA) or may be collected during plan implementation.

The EA process produces data and information which can provide baseline context for project effects and support the selection of mitigation measures and relevant indicators or targets for tracking their effectiveness. Management Plans should consider and integrate this information; however, it is not necessary to repeat detailed reports and data collected in the EA.

The EAO recommends summarizing the relevant baseline information, with references to relevant reports or other supporting materials when relevant. Some EACs may require additional surveys and data collection after an EAC is issued or during initial phases of a project to provide the data necessary for Management Plan development. Even when not required, the EAO recommends that Holders consider collecting new baseline data in some situations where the EA data may no longer be relevant, for example when there is a large gap between the when the EA was conducted and the commencement of Construction. This new baseline data can be used to mitigate the concerns of Consulted Parties and ensure that monitoring is still able to evaluate the effectiveness of the Project’s mitigations.

An example of baseline information used to support the evaluation of mitigation measure effectiveness is provided below:

“The results of the water quality monitoring program will be assessed relative to the baseline water quality data collected throughout the year immediately preceding Construction (Appendix X) in accordance with the mitigation effectiveness evaluation schedule identified in Section 5.3.”

Where baseline information is not required, Holders must document this, and the rationale for the lack of this information, in the Management Plan, subject to the Requirements of the Condition. For instance, a Gender and Cultural Safety Plan or Health and Medical Services Plan will have some baseline community data included in its analysis and reporting, but it is unlikely to include worker and work camp data unless there was an existing work camp already in place.

3.5. Adaptive Management & Trigger Response

Many EACs require Adaptive Management, and even when not required, Adaptive Management is beneficial to include to allow for flexibility. Broadly, Adaptive Management Requirements can be met through a detailed Adaptive Management process and/or a trigger response process, subject to any specific Requirements in the applicable conditions. The exact approach chosen will be determined by the QP responsible for drafting the plan and should consider the specific Condition requirements (which may explicitly require trigger responses, for example), the nature of the mitigations, and whether the associated monitoring program allows for trigger thresholds to be identified. Adaptive Management or trigger response processes that result in changes to mitigation or monitoring approaches may require formal updates to the Management Plan (as described in **Section 6.2**) when the changes are long-term/permanent. All Adaptive Management and trigger responses procedures require documentation by decision-makers to support their implementation and ensure compliance with the EAC and Management Plan.

3.5.1 Adaptive Management

Adaptive Management enables Holders to implement mitigation and respond to unanticipated or unpredictable project effects within an established framework. It provides an iterative framework for developing, implementing, evaluating, and, if necessary, altering mitigation or monitoring approaches, or implementing new ones, to enhance the achievement of plan objectives. While Adaptive Management can address uncertainties regarding project effects, it does not replace a detailed mitigation strategy. Adaptive Management must be supported by a monitoring and/or mitigation effectiveness evaluation program which produces the data necessary to inform its implementation.

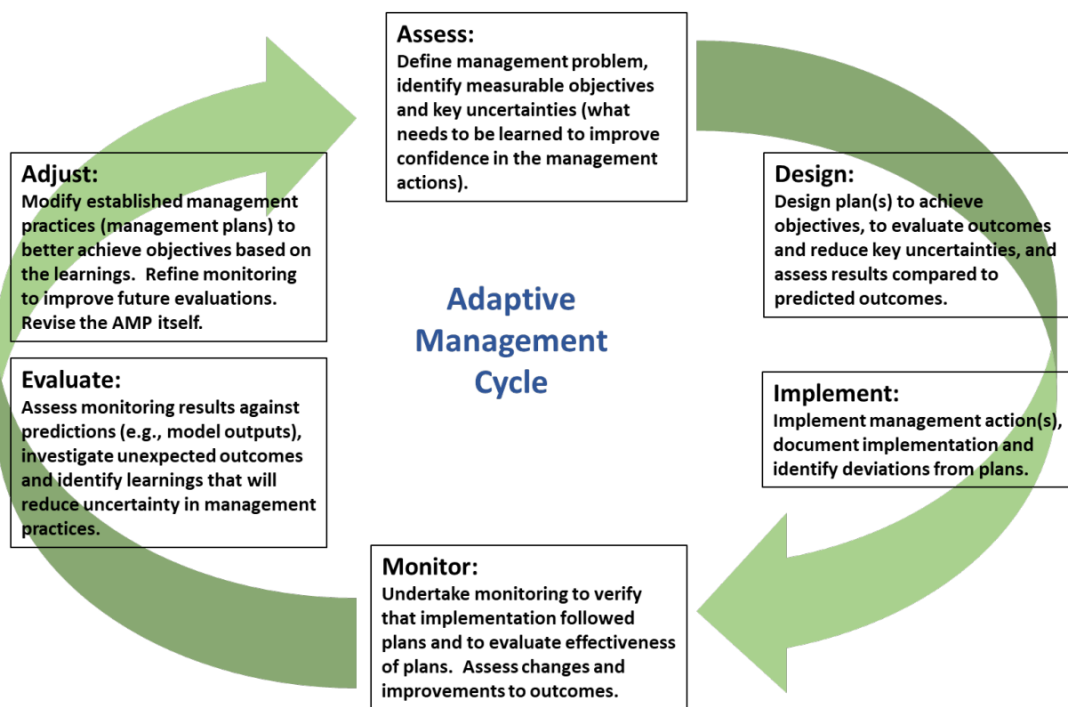


Figure 2, ENV, 2022, Adaptive Management Cycle.

Additional guidance regarding Adaptive Management is provided in ENV's guidance document [Development and Use of Adaptive Management Plans \(ENV 2022\)](#).

3.5.2 Trigger Response

Some EACs contain Conditions which require a trigger response plan, or a Holder may choose to include one to manage effects on Valued Components that exceed expected thresholds. The process must set out the actions to be taken in response to monitoring results: if mitigation is working or a threshold is not met, the Holder should continue with existing measures; if the mitigation is not working or a threshold is met, the Holder should alter existing measures or implement previously identified contingency measures.

Management Plans should clearly describe how response actions will be documented and reported.

Additional guidance regarding trigger response is provided in ENV's guidance document [Development and Use of Trigger Response Plans \(ENV 2022\)](#).

3.5.2.1 Altered Mitigation Measures

Altering existing mitigation may be appropriate where project effects are limited in scope or severity and monitoring shows current measures are only partly effective. If an altered measure won't resolve the issue within a reasonable timeframe given the severity of the effect, contingency measures should be used instead.

"If an exceedance of the BC Water Quality Guidelines occurs, the duration of instream work breaks will be increased from 30 minutes to 60 minutes to allow additional sediment to disperse prior to resuming instream excavation."

3.5.2.2 Contingency Mitigation Measures

Contingency measures are appropriate where monitoring shows existing mitigation isn't working and immediate action is needed to address an adverse effect (e.g., hydraulic fluid releases, equipment malfunctions, or other emergency events). Descriptions should include clear implementation steps, defined roles and responsibilities, and any follow-up actions needed before resuming normal operations (e.g., notifications, regulatory reporting, incident investigation).

[continued from above] "If exceedances of the BC Water Quality Guidelines continue to occur despite increased duration and / or frequency of instream work breaks, a sediment curtain will be installed to isolate the instream work area from the receiving environment."

4.0 CONSULTATION FOR MANAGEMENT PLANS

This section provides guidance regarding consultation for Management Plan development and updates. Holders are responsible for fully addressing the Consultation Requirements described in relevant EAC Condition(s) (e.g., the Consultation Condition and Management Plan-specific Condition); however, this section provides recommendations to consider. The EAO does not require a specific consultation process as each situation and Consulted Party are unique. A high-level overview of a recommended Consultation process, which summarizes **Section 4**, is provided below.

1. Establish points of contact, anticipated timelines for plan development and associated consultation, and bilateral communication processes with required Consulted Parties.
2. Request input from each Consulted Party regarding priorities / concerns, preferred level of involvement, and feedback regarding plan content.
3. Prepare the initial draft plan considering input received from Consulted Parties.
4. Distribute the draft plan to Consulted Parties for review within a reasonable timeframe, unless otherwise specified by a Requirement, that is ideally mutually agreed upon (dependent on nature of project, plan content and length, level of detail, etc.).

- Lack of response from a Consulted Party does not mean consultation has been fulfilled. Follow up with any Consulted Parties that have not responded, using multiple forms of communication, to confirm they have received the plan and determine whether they plan to provide feedback. These attempts must be documented and provided to the EAO with consultation records associated with the plan to demonstrate that an effort was made to solicit feedback.
- 5. Address Consulted Parties' comments / questions and incorporate feedback into the draft plan, documenting rationale for any feedback that was not incorporated.
- 6. Redistribute subsequent revisions to Consulted Parties, along with a record of consultation documenting responses to feedback provided.
- 7. Continue the Consultation process (4-6 above) with Consulted Parties until Consultation Requirements under the EAC have been met or exceeded.
- 8. Submit the Management Plan and associated records to EAO (**Section 5.1**).

For any questions related to meeting Consultation Requirements, please contact

EAO.ManagementPlanSupport@gov.bc.ca.

4.1. Consulted Parties

The Management Plan Condition lists the Consulted Parties that should be involved in development of the plan. Full and impartial consideration of their collective input provides confidence that sufficient knowledge and expertise supported development of the Management Plan.

The Management Plan Condition identifies the parties that must be consulted during the development of the Management Plan.

While records of prior consultation (for example, during the EA) regarding issues relevant to Management Plan content may inform the consultation process, they do not replace Consultation specific to the plan itself. Consulted Parties reserve the right to not be consulted on Management Plans in advance of an EAC being issued, even if a plan has already been drafted prior to authorization being granted. The EAO expects Holders to accommodate reasonable requests regarding the consultation process (e.g., preferred means of communication, additional time to review detailed or complex plans, etc.).

Holders should confirm with Consulted Parties that information received during the consultation process may be documented and posted in the publicly accessible EPIC registry. **Traditional knowledge, sensitive personal and/or corporate information may be shared with the Holder with the understanding that it will not be made accessible to the public.** If so, the Holder may contact the EAO for guidance regarding maintaining confidentiality and should communicate if there are documents provided to EAO which are subject to confidentiality.

The draft Management Plan must be provided to Consulted Parties with a written notice inviting their comments and stating the review timeline. The review timeline may be identified in the Management Plan Condition, or if not identified, the Holder should specify a reasonable review timeline (determined collaboratively with each consulted party in consideration of their capacity and resources available for consultation). The EAO typically considers 30 days to be a reasonable timeframe to allow sufficient time for Consulted Parties' review and responses; however, Holders should aim to agree upon mutually acceptable review timelines with individual Consulted Parties.

The EAO may also provide Consulted Parties with informational advice on topics such as clarifications around the scope of their feedback. Consulted Parties may also reach out to the EAO directly if issues arise during the consultation process.

4.2. Depth of Consultation

The EAO expects that consultation will include bilateral, iterative communication between the Holder and Consulted Parties, and will be aimed at achieving mutual understanding regarding Management Plan content. Potential depths of consultation range from notification (i.e., one-way informational updates), to responding to feedback, collaborative determination of plan objectives and Management Actions, or cooperative decision-making. The depth of consultation depends on the priorities and concerns of the Consulted Parties, and the relative certainty of outcomes described in the plan.

In the absence of replies to communication, Holder should follow-up with each Consulted Party to confirm they do not wish to provide feedback, ideally using different means of communication and / or targeting a different individual(s) in the organization.

Consultation should be meaningful (i.e., in good faith), timely, transparent, and proactive, with full and impartial consideration given to the views and information provided by Consulted Parties. Total agreement on every issue is not required, but the EAO expects Holders to demonstrate clear attempts at effective communication, thorough consideration of input, and rationale for any unresolved concerns or feedback. It is the responsibility of Holders to determine when Consultation is complete, informed by whether Consulted Parties consider their concerns addressed with subsequent plan drafts. This may streamline the Management Plan review process since the EAO does not review Management Plans until Consultation Condition Requirements have been demonstrated to be met.

Holders may contact the EAO for further guidance on conducting consultation in accordance with the Conditions of their EAC, or if concerns arise during the consultation process.

4.3. Documenting Consultation Activities

Conducting and documenting Consultation in accordance with EAC Conditions is a core Requirement of Management Plan development. For Management Plans required to be developed in Consultation with one or more Consulted Parties, these records must be provided when submitting the plans to the EAO. The minimum Requirements for records of consultation include the following:

- Records of meetings, correspondence and communication throughout the consultation process;
- Alterations made to the plan as a result of the consultation process;
- Demonstration of full and impartial consideration of the views of each Consulted Party, including responses to each party summarizing the Holder's understanding of their feedback, how it was considered and / or addressed, and discussion of any issues or concerns that were not addressed; and
- Sensitive and / or confidential information managed in accordance with the process determined by each Consulted Party and / or the EAO.

Maintaining a detailed record of Consultation facilitates the consultation process by managing communications and comments which may evolve over multiple phases of Management Plan development. The Consultation comment tracker is useful for documenting notice given to Consulted Parties, content of discussions, views and input received, follow-up communications and outcomes (e.g., resulting changes to the plan, whether consensus was reached, etc.).

Maintaining a detailed record of consultation allows Holders to promptly provide records to the EAO if / when requested and prevents unnecessary delay of the Management Plan review

If the EAO cannot verify that the Holder's Consultation Requirements have been met, it may direct the Holder to engage in additional consultation activities and/or provide additional records of consultation. The EAO may contact Consulted Parties directly to confirm that consultation records are accurate.

Typically, to demonstrate satisfaction of the Consultation Condition, Holders will provide at least the following documents:

- **Consultation Record:** tracks consultation activities (e.g., emails, meetings, etc.) with each Consulted Party; and
- **Comment Tracking Table:** records the iterative process of input received and the Holder's response over one or more rounds of consultation. A simplified example is provided in **Appendix B**.

Other documents may also provide supporting evidence of the Consultation Condition Requirements being met, if needed, such as a cover letter or engagement report that explains the context of the other consultation records provided and documents any issues that were encountered. These documents are not required but may help to streamline the review process and help EAO respond to the Holder with a decision earlier.

4.4. Consultation in Development of a Plan vs. Updates

The Requirements in the Consultation Condition apply to the initial development of a Management Plan. For subsequent plan updates, either Holder-initiated or required through the Documents Update condition, the process for Consultation must be detailed in the plan's update process. It may also be specified in the EAO's instructions for an update required through the Documents Update Condition.

The Consultation Requirements for updates can vary across plans or projects, but there is typically a difference between non-substantive updates and substantive updates. Any substantive updates to the plan require consultation according to the details provided within the plan's update process, typically to the same level of consultation as was originally required during plan development. Determination of whether an update is substantive is defined by an EAC's Conditions and subject to decision by the EAO.

Holders are encouraged to contact the EAO for clarification and direction on whether Consultation is required for an update to a Management Plan at EAO.ManagementPlanSupport@gov.bc.ca.

5.0 MANAGEMENT PLAN REVIEW PROCESS

Contemporary EACs require EAO review or approval for most Management Plans. Timelines for Management Plan submission and review are typically identified in the Management Plan Condition and/or Document Review Condition. Only final and complete (i.e., not draft) Management Plans submitted with all the required components will be reviewed once an EAC has been issued. Management Plans will not be reviewed in advance of the EAC being issued.

Upon reviewing a Management Plan, the EAO may require revisions within the timeframe specified in the Holder's EAC Conditions.

The Management Plan Condition and Document Review Condition identify the specific Requirements for plan submission, review, and implementation. The Document Review Condition also specifies the timeline for EAO's review, from the time that the documents are submitted to when the Holder will receive a decision, assuming that all documents are final and complete when initially submitted.

An overview of the Management Plan review process is as follows:

1. The Holder submits the plan, and the EAO verifies the submission package includes all required components (**Section 5.1**).
2. The EAO reviews the Holder's record of consultation (**Section 5.2**).
3. The EAO notifies the Holder that either i) additional consultation or supporting documentation is required, or ii) the comprehensive review begins (**Section 5.3**).
4. The EAO conducts a comprehensive review and determines whether all Requirements have been fully addressed (**Section 5.4**).
5. The EAO provides its review findings to the Holder, indicating that either i) revisions are required prior to implementation, ii) the Holder may proceed to implement the plan, but a revised version must be provided to the EAO prior to a specified date or other milestone, or iii) the Holder may proceed to implement the plan without revisions (**Section 5.5**).

It's recommended that Holders connect with EAO's Post-Decision Oversight Team when the Holder is designing their approach for Management Plan development by contacting EAO.ManagementPlanSupport@gov.bc.ca. This allows for effective communication between the Holder and the EAO to ensure that review timelines and required content are clearly understood, and that resources are available for plan reviews.

Figure 3 provides an overview of the lifecycle of a Management Plan, including the development and review process, and implementation.

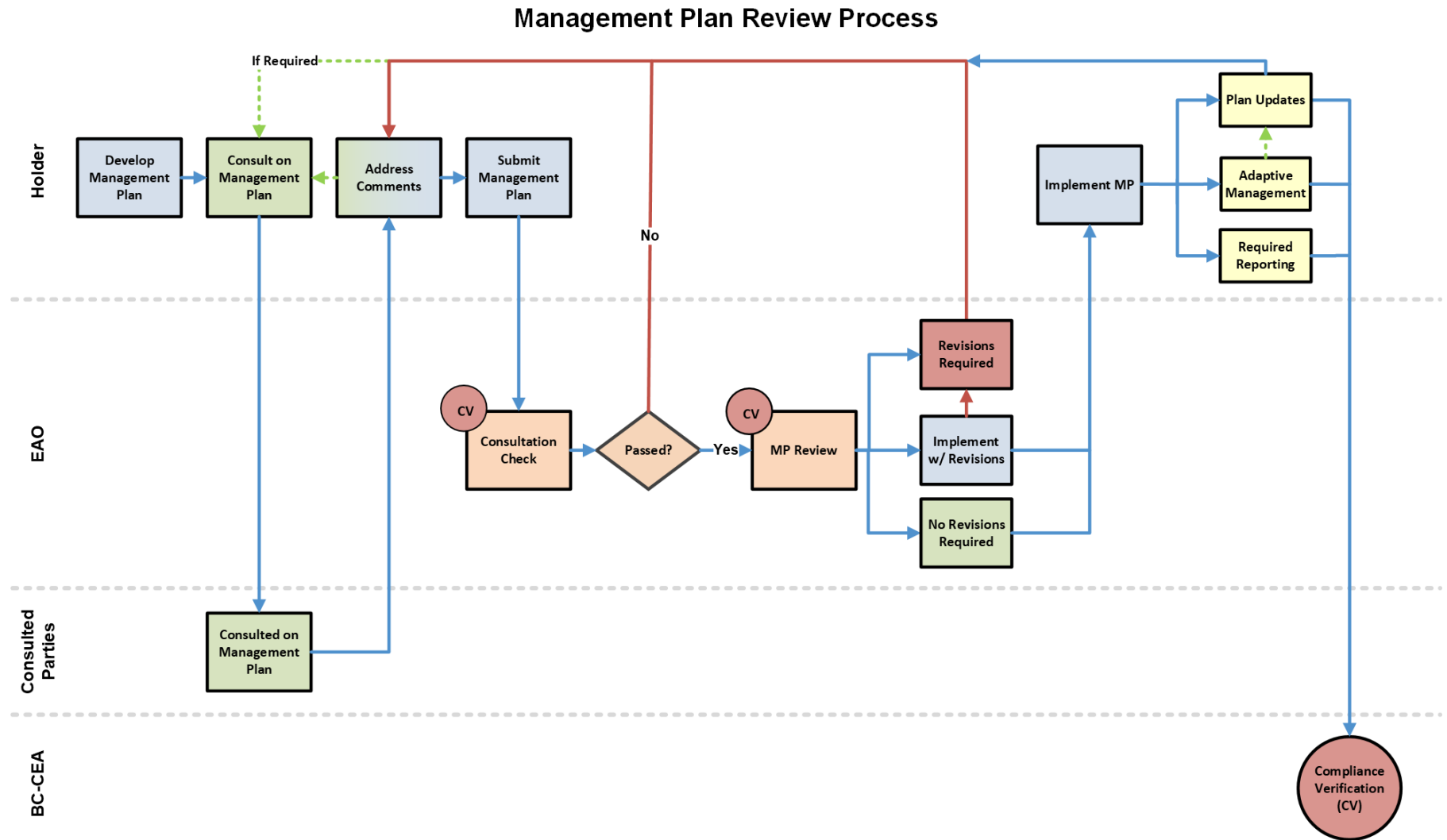


Figure 3, EAO, 2026, Management Plan Development and Review Process

5.1. Submission

Management Plans are now submitted via [EPIC.submit](#), an online application that streamlines the submission and review of all Management Plans, consultation records and other related / supporting documents, automatically tracks plan revisions, and facilitates communication between Holders and the EAO.

The EAO initiates the review process upon receiving a complete submission package and verifying that the minimum required content has been provided:

- **Management Plan:** A complete/final (i.e., not draft) plan to which the Holder attests all Requirements have been addressed. This must be a clean version which contains no markup or tracked changes.
- **Consultation records:** A summary of the consultation process/methods used to engage with Consulted Parties during plan development, including a record of input received and how it was addressed. Includes both a Consultation Record and Consultation Comment Tracker (see **Section 4.3**).

For Management Plans re-submitted following updates during plan implementation or where revisions are required following EAO review, the EAO strongly recommends at least one of these supporting documents is provided to support an expedited review process:

- **Tracked changes / Red-line version:** A document that clearly shows the changes relative to the previously reviewed/approved version of the plan;
- **Tracked Changes Table:** A table providing clear explanations of the changes and associated justification or rationale. This table should also identify any implications regarding related plans or permits; and/or
- **Direct Responses to EAO Comments/Instructions:** Following revisions made in response to EAO review, a table providing the Holder's responses to each comment, resulting changes to the plan, and rationale for making the change. The Holder may choose to simply add an extra column to the EAO's review findings and/or detailed review comments to provide these details.

Please note, if there are no documents submitted which detail changes that have been made, the review may take longer (within the review period) and the entire plan may be subject to review, not just parts of the plan which contain changes.

Upon submission, the Holder will receive an automatic response via email indicating that the submission package was received, and the EAO will verify that the submission package is complete and contains all the required components.

Detailed information regarding the Management Plan submission process is provided in the EAO's [EPIC.submit User Guide](#). For additional support and/or troubleshooting, please contact EAO.ManagementPlanSupport@gov.bc.ca.

5.2. Consultation Check

Prior to reviewing a Management Plan, the EAO checks the Holder's record of consultation conducted with the required Consulted Parties. Failure to demonstrate that consultation was conducted or efforts were made to consult with all required parties in accordance with the EAC Conditions will result in the EAO returning the Management Plan to the Holder to fully address the outstanding Requirements prior to commencing its review.

The Consultation check includes verifying the consultation activities conducted, means of communication, and efforts to elicit feedback and comments regarding the Management Plan. The EAO also reviews the Holder's incorporation of feedback into the Management Plan, and the Holder's rationale for omitting any feedback that was not incorporated into the plan.

In addition to reviewing the Holder's consultation record, the EAO may contact Consulted Parties to confirm that the record accurately reflects the consultation activities conducted.

5.3. Notification

Upon verifying the submission package is complete and conducting the Consultation check, the EAO will notify the Holder if additional supporting documentation and/or consultation is required prior to the EAO's review of the management plan contents.

If the consultation check is passed, the EAO will proceed to review the Management Plan, and the Holder will not receive a notification until the review is complete. Holders can view the status of the Consultation check and plan review in [EPIC.submit](#).

5.4. Comprehensive Review

The EAO conducts a detailed evaluation of Management Plans to verify that all Requirements of applicable EAC Conditions have been fully addressed, including any Requirement that the plan be developed by a QP/QPerson operating within their applicable area of practice. The EAO also verifies that Management Plan content is consistent with the key elements described in **Section 3**, including clear identification of the plan objectives and specific, measurable, attainable, relevant, timebound, and enforceable descriptions of the Management Actions.

Management Plans submitted without all the required components may delay the review process. Holders can reduce the potential for such delays by ensuring that Requirements are fully addressed and the information is presented in a clear, concise and accessible format. The EAO notes that the submission timeline(s) identified in the EAC indicate the minimum timeframe relative to a specific project milestone by which plans must be submitted, but Holders may submit Management Plans earlier than this date.

The EAO's review encompasses all components of Management Plans; however, the review is typically focused on the specific Requirements of the relevant Conditions of Holders' EACs, and the enforceability of the language used in the plan. Technical components of the plan are typically consulted on/reviewed by the relevant Consulted Parties identified in the Management Plan Condition.

5.5. Communication of Findings

5.5.1. Revisions Required

If the EAO determines that the Management Plan does not fully address the Requirements of all relevant Conditions, the EAO will issue the Holder a letter stating one of the following outcomes:

- a) **Revisions required.** If a plan submitted for Approval does not meet all its Requirements, the EAO will provide rationale and instructions for revising the plan, and the limitation on implementation remains in place; or
- b) **Implementation with revisions.** If a plan submitted for Approval requires only minor revisions, the EAO may allow a plan to be implemented with revisions, subject to the Holder's submission of a revised version of the plan within a specified timeline. If a plan submitted for Review requires revisions, it will receive a notification under this process.

The EAO's review findings will indicate whether each Requirement was addressed and provide instructions for any Requirements that were not fully addressed and may identify specific statements in the Management Plan that require revision. Simplified examples of the EAO's review findings and associated detailed review are provided in **Appendix C** and **Appendix D**. Simplified examples of corresponding Holder responses, which can be submitted alongside a revised plan, are provided in **Appendix E**.

Unless otherwise directed by EAO, revisions required by the EAO's instructions do not require additional Consultation with Consulted Parties.

5.5.2. No Revisions Required

If the EAO determines that a Management Plan submitted for Approval or Review fully addresses the Requirements of all relevant Conditions, it will communicate that the Holder may implement the plan without revisions. This constitutes Approval for plans which require Approval. Alternatively, if the review timeline specified in the EAC has elapsed, the Holder may consider the plan finalized for implementation.

A copy of the finalized Management Plan will be posted to the public [EPIC](#) project page. This version becomes the enforceable version for compliance and enforcement purposes until an updated version is submitted to EAO.

5.6. Fee Orders

In accordance with the [Environmental Assessment Fees Regulation](#), the EAO will issue fee orders for review of Management Plans and / or other post-certificate documents (e.g., reports) that are required for the EAO Review or Approval. Fee orders do not apply to documents for which a fee order has been previously issued and paid by the Holder (e.g., annual updates or revised plans). Fee orders are typically issued via batch processes associated with project milestones (i.e., the start of the Construction and Operations phases) or at the end of the fiscal year.

More information regarding fees set out in the Environmental Assessment Fees Regulation is provided in the [Environmental Assessment Office Fees Guideline](#). For further clarification regarding the fee order process, contact the EAO at EAO.ManagementPlanSupport@gov.bc.ca.

6.0 IMPLEMENTATION & NEXT STEPS

This section provides guidance regarding Management Plan implementation following EAO review, including internal reviews, required reporting, plan updates, and compliance verification and enforcement. **Figure 4** provides an overview of the processes associated with Management Plan implementation.

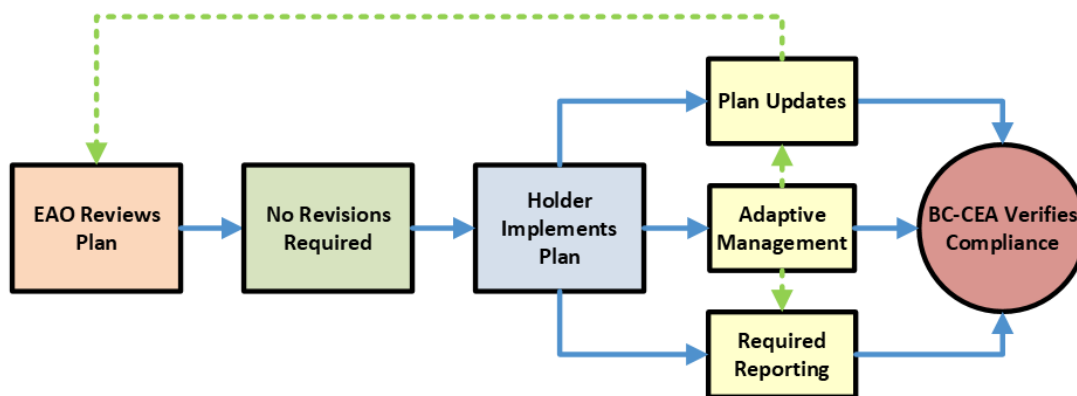


Figure 4, EAO, 2026, Management Plan Implementation Processes.

6.1. Holder Reviews and Reporting

6.1.1. Plan Reviews

Plan reviews allow Holders to assess the implementation of Management Actions and track performance relative to the plan's objectives, providing opportunities for continuous improvement, early identification of potential non-compliances, and implementation of response actions.

The frequency of formal reviews should align with the applicable standard Conditions (e.g., Compliance Verification and Reporting), the Management Plan Condition, or be identified within the Management Plan itself. The EAO recommends that Holders' Adaptive Management cycle be more frequent than formal reviews, and consider the relative risks associated with the plan's objectives and the nature of the project (see **Section 3.5**). If an adaptive management process results in the Holder updating the plan, the Holder must submit the updated plan to the EAO. The consultation requirements on the update are determined based on the nature of the updates (see **Section 4.4**).

6.1.2. Required Reporting

EAC Conditions sometimes require submission of reports on Management Plan implementation, and identify the associated schedule, reporting methods, and required recipients (e.g., EAO, Consulted Parties, other regulators). Monitoring results / data collected during plan implementation typically form the basis for required reporting.

Additionally, the Chief Executive Assessment Officer has the authority under Section 30 of the Act to issue direction requiring Holders to submit mitigation effectiveness reports for projects certified by an EAC. The Order will outline mitigation effectiveness reporting criteria and frequency, and monitoring data required. More information regarding mitigation effectiveness reporting is provided in the EAO's [Information Bulletin on Mitigation Effectiveness](#).

6.2. Making Changes to Management Plans

Management Plans are living documents to which periodic updates are expected. A schedule or frequency for updates may be specified in the EAC Conditions (e.g., annually) or identified by the Holder within the Management Plan.

Management Plan updates may be required by EAO due to compliance and enforcement actions, or if the plan is not being implemented to the satisfaction of the EAO, depending on the relevant Condition(s) in the EAC. If plan updates are required, the EAO will notify the Holder via letter or email. In accordance with the relevant Condition (e.g., Document Updates / Implementation Condition), changes may be required if the EAO determines that the implementation of the Management Plan is not:

- i. Meeting one or more objectives set out in the relevant condition of the EAC or the purpose and objectives set out in the Management Plan;
- ii. Having the effects, set out in the Management Plan, that are contemplated or intended; or
- iii. Consistent with changes in industry best practices or technology.

Management Plans are living documents that provide flexibility for Holders and the EAO to adapt their implementation.

Making changes to Management Plans provides Holders with the flexibility to adapt Management Actions to account for project evolution or changes that are within the project scope certified in the EAC. Changes to what is approved in the EAC require an Amendment. More information regarding Amendments is provided in the EAO's [Amendments to Environmental Assessment Certificates and Exemption Orders - Guidance for Holders](#).

6.2.1. Process for Updating Management Plans

Requirements for initial Management Plan development apply equally to plan updates. If QP/QPerson involvement is a Requirement of plan development or implementation, then a QP/QPerson must be involved in the update process.

The process for updating Management Plans is usually included in the plan itself (a Requirement under the Document Development Condition), however the process should be similar to the initial development process, such as:

1. Updates initiated by either Holder (as needed, based on review schedule, or to formalize changes made from Adaptive Management) or the EAO (under Document Updates Condition).
2. Holder makes proposed changes in consultation with required parties (See Section 4.4), if required.

3. Holder submits updated plan and supporting documentation to the EAO.
4. The EAO reviews consultation records (if Consultation was required) and notifies the Holder if additional consultation must be undertaken or records must be provided.
5. The EAO reviews plan changes (under Document Review Condition).
6. The EAO provides communication of findings (see Section 5.5) indicating:
 - a. The Holder must make revisions and resubmit the plan;
 - b. The Holder may implement the updated plan with revisions; or
 - c. The Holder may implement the updated plan without revisions.

Under Step 6 a., until the updated plan has been finalized by the EAO for implementation, the Holder must continue to implement the previous version of the plan (except in cases where the plan is being updated to reflect Adaptive Management that has already occurred).

The EAO recognizes that some Management Plan updates may have limited impact to the intent or enforceability of the plan (e.g., changes that do not alter mitigations or monitoring). In most situations, the EAO will only review the revised sections of a Management Plan (see **Section 5.1 Submission**).

6.3. Compliance and Enforcement

Compliance and enforcement for the EAO is overseen by the BC Compliance and Enforcement Agency (BC-CEA) within the Ministry of Environment and Parks. The BC-CEA is responsible for ensuring Management Plans are implemented in accordance with the Conditions of Holders' EACs. Management Plans are legally binding regulatory instruments, and the BC-CEA verifies that Holders are compliant with the Requirements described therein.

It is Holders' responsibility (including that of their employees, contractors, and subcontractors) to maintain compliance with their regulatory Requirements under the Act, including the EAC, Management Plans and other documents. The EAO / BC-CEA's role is to verify the Holder's compliance with the EAC. If Holders are found non-compliant, the BC-CEA may use enforcement mechanisms to deter ongoing or future non-compliance. These mechanisms include warnings or orders to cease works and / or remedy the non-compliance, or recommendations to decision-makers that they issue administrative monetary penalties. Continued non-compliance may result in court-imposed fines.

More information regarding compliance and enforcement under the EAA is provided in the [Compliance and Enforcement Policy and Procedures Manual](#). For additional clarification, contact the BC-CEA at EAO.Compliance@gov.bc.ca.

APPENDIX A. ADDITIONAL GUIDANCE & TEMPLATES RELATED TO MANAGEMENT PLANS

[Environmental Assessment Certificate Policy](#) (EAO 2021)

[Environmental Assessment Office Fees Guideline](#) (EAO 2021)

[Compliance and Enforcement Policy and Procedures Manual](#) (EAO 2020)

[Development and Use of Adaptive Management Plans](#) (ENV 2022)

[Development and Use of Trigger Response Plans](#) (ENV 2022)

[Policy for Mitigating Impacts on Environmental Values](#) (ENV 2014)

[Procedures for Mitigating Impacts on Environmental Values](#) (ENV 2014)

[Consultation Comment Tracker Template](#) (EAO 2023)

APPENDIX B. CONSULTATION COMMENT TRACKER - EXAMPLE

Document Version	Date Plan Provided	Comment Date	Commenting Party	Theme	Round 1 Comment	Holder Response	Round 2 Comment	Status of Issue
Revision 0.1	May 14, 2024	May 31, 2024	First Nation A	Adaptive Management	First Nation A requests the adaptive management plan include contingency measures to address the potential for ineffective sediment dispersion management resulting from variable weather Conditions.	Holder has engaged Qualified Professional to develop additional adaptive management measures to address the potential for ineffective sediment dispersion management resulting from variable weather Conditions.	First Nation A confirms this approach is suitable.	Outstanding
Revision 0.1	May 14, 2024	June 7, 2024	First Nation B	Reporting	First Nation B requests that required water quality monitoring reports include dissolved oxygen data.	Holder commits to including dissolved oxygen data in required water quality monitoring reports.	N/A	Resolved
Revision 0.1	May 14, 2024	June 9, 2024	Regulatory Agency 1	Regulatory Guidelines	Regulatory Agency 1 notes that the version of the BC Water Quality Guidelines referenced in the plan is out of date.	Holder has revised the plan to reference the latest version of the BC Water Quality Guidelines (i.e., August 2024).	N/A	Resolved
Revision 0.1	May 14, 2024	June 10, 2024	Local Government X	Geographic Extent	Local Government X notes that the geographic extent of the plan does not include Access Road 1.	Holder responds that the plan does not include Access Road 1, as no active construction will occur.	None	Partially Addressed
Revision 0.2	August 8, 2024	August 15, 2024	First Nation A	Adaptive Management	First Nation A considers the additional contingency measures added to the adaptive management plan appropriate.	N/A	N/A	Resolved
Revision 0.2	August 8, 2024	August 23, 2024	Local Government X	Geographic Extent	Local Government X notes that while active construction will not occur, traffic along Access Road 1 may impact water quality in Creek C.	Holder revises plan to include Access Road 1 and water quality monitoring within Creek C.	Local Government X confirms this approach is suitable.	Resolved

APPENDIX C. EAO REVIEW FINDINGS - EXAMPLE

Note: The comments below are generalized/hypothetical examples only. Holders should always refer to the EAO's comments regarding their specific Management Plan.

Condition No.	Requirement	Addressed?	EAO Comments/Instructions
Condition 2	Where a Condition of this Certificate requires the Holder to develop a plan, program or similar document, any such plan, program or document must, at a minimum, include the following information:	N/A	Instructions to Holder.
Condition 2 (a)	Purpose and objectives of the plan, program or other document;	Yes	
Condition 2 (b)	Roles and responsibilities of the Holder, Project personnel and contractors;	Yes	
Condition 2 (c)	Names and if applicable, professional certifications and professional stamps/seals, for those responsible for the preparation of the plan, program or other document;	Partial	The Water Quality Management Plan (WQMP) provides the names and professional certifications of those responsible for its preparation; however, professional stamps/seals are not included. Revise the WQMP to include the professional stamps/seals of those responsible for its preparation.
Condition 2 (d)	Schedule for implementing the plan, program or other document throughout the relevant Project phases;	Yes	
Condition 2 (e)	Means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	No	Determining the effectiveness of mitigation measures requires the identification of baseline data/information that against which the results of monitoring data will be evaluated and the qualitative and/or quantitative indicators/thresholds that will be used to assess performance relative to baseline. Revise the WQMP to identify the baseline data/information that will be used to evaluate the effectiveness of planned mitigation measures (e.g., a description of baseline water quality data collection prior to Construction) and the indicators/thresholds that will be used to assess performance relative to baseline (e.g., statistical trends in dissolved oxygen concentration; frequency/duration of visually turbid water occurrences at water quality monitoring stations 3, 4 and 5; magnitude of exceedances of the BC Water Quality Guidelines (BC WQG) for total suspended solids; short- or long-term fish habitat avoidance observed in Creek B, etc.). Refer to Detailed Review Comment 1.
Condition 2 (f) i.	Adaptive management plan to address effects of the Project if monitoring shows that those effects: i. Are not mitigated to the extent contemplated in the Application; or	No	The WQMP does not identify the potential Project effects and associated mitigation measures contemplated in the Application. Revise the WQMP to identify the potential Project effects and associated mitigation measures contemplated in the Application (e.g., erosion and sediment control measures to mitigate potential effects to sensitive aquatic receptors

Condition No.	Requirement	Addressed?	EAO Comments/Instructions
			identified in Section X.Y.Z of the Application's Environmental Effects Assessment) and describe the implementation of alternate or contingency mitigation measures if monitoring indicates they are not mitigated to the extent contemplated.
Condition 2 (f) ii.	Adaptive management plan to address effects of the Project if monitoring shows that those effects: ii. Are not predicted in the Application;	No	The WQMP does not describe how potential Project effects additional to those predicted in the Application will be identified and/or addressed. Revise the WQMP to describe how potential Project effects not predicted in the Application will be identified, and how alternate or contingency mitigation measures will be implemented if they are identified.
Condition 2 (g)	Schedules and methods for the submission of reporting to specific agencies, First Nations and the public, and the required form and content of those reports; and	Yes	
Condition 2 (h)	Process and timing for updating and revising the plan, program or other document, including any consultation with agencies and First Nations that would occur in connection with such updates and revisions.	Partial	The WQMP identifies a schedule for periodic updates/revisions; however, the update/revision process (including any consultation with regulatory agencies and/or First Nations) is not described. Revise the WQMP to identify the means by which the Holder will update/revise the WQMP, including any consultation that would occur in connection with such updates/revisions (e.g., periodic revisions to include a systematic review of mitigation effectiveness evaluation and adaptive management implementation; draft versions of the updated plan to be provided to Regulatory Agencies 1 and 2 and First Nations A and B for consultation).
Condition 2	Where a plan, program or other document includes monitoring Requirements, the plan, program or other document must include:	N/A	Instructions to Holder.
Condition 2 (i)	Description of baseline information that will be used to support monitoring of the effectiveness of mitigation;	No	The WQMP does not describe the baseline water quality data that will be used to support evaluation of the effectiveness of erosion and sediment control measures at Creeks A, B, and C. Revise the WQMP to describe the baseline water quality data that will be used to support evaluation of the effectiveness of erosion and sediment control measures at Creeks A, B, and C (e.g., baseline data collected over the 12 months immediately preceding Construction and/or the identification of background water quality monitoring stations upstream of the project footprint at Creeks A, B and C).
Condition 2 (j)	Methodology, location, frequency, timing and duration of monitoring; and	Partial	The WQMP identifies the location, frequency, timing and duration of the water quality monitoring program; however, the methods of data collection and analysis are not identified.

Condition No.	Requirement	Addressed?	EAO Comments/Instructions
			Revise the WQMP to identify the methods used to collect and interpret water quality monitoring data (e.g., sampling methodology, sample storage/transportation methodology, laboratory assays, etc.).
Condition 2 (k)	Scope, content and frequency of reporting of the monitoring results.	Partial	The WQMP describes the submission of bi-annual water quality monitoring reports to Regulatory Agencies 1 and 2 and First Nations A and B; however, the content of those reports is not described. Revise the WQMP to describe the content of the bi-annual water quality monitoring reports (e.g., water quality parameters included, frequency and magnitude of exceedances the BC WQG, statistical analysis relative to baseline/background data and/or interpretation of spatial and temporal trends).
Condition 4	The Holder must retain a Qualified Professional to develop a plan to manage potential effects to water quality throughout Construction.	Yes	
Condition 4	The plan must be developed in consultation with Regulatory Agency 1, Regulatory Agency 2, Local Government X, Local Government Y, First Nation A, and First Nation B.	Yes	
Condition 4	The plan must describe:	N/A	Instructions to Holder.
Condition 4 (a)	Mitigation measures to minimize effects to water quality during Construction, including measures to minimize sediment dispersion;	Partial	Refer to Detailed Review Comments 2 and 3.
Condition 4 (b)	How the Holder will implement the mitigation measures set out in Section X.Y.Z (the In-Water Works Management Plan) of the Application;	Yes	
Condition 4 (c)	Mitigation measures to manage sediment dispersion during dredging, including decision criteria and associated response actions to address potential adverse effects to water quality if those measures are not effective;	Partial	The WQMP identifies mitigation measures to manage sediment dispersion during dredging; however, decision criteria and associated response actions to address potential adverse effects to water quality if those measures are not effective are not included. Revise the WQMP to describe the decision criteria and associated Management Actions to address adverse effects to water quality during dredging (e.g., the contingency measures or corrective actions that would be implemented in response to an exceedance of the BC WQG for turbidity that persists for over 24 hours).
Condition 4 (d)	Monitoring to achieve water quality consistent with the BC Water Quality Guidelines: Aquatic Life, Wildlife & Agriculture (BC WQG; August 2024, or as amended from time to time);	Yes	

Condition No.	Requirement	Addressed?	EAO Comments/Instructions
Condition 4 (e)	How the Holder will identify, document and report any exceedances of the BC WQG to Regulatory Agency 1, and measures to remedy the exceedances;	Partial	The WQMP describes measures to identify and document exceedances of the BC WQG; however, the means by which the Holder will report exceedances of the BC WQG to Regulatory Agency 1 are not described. Revise the WQMP to describe the means by which the Holder will report exceedances of the BC WQG to Regulatory Agency 1. Refer to Detailed Review Comment 4.
Condition 4	The plan and any amendments thereto must be implemented throughout Construction under the supervision of a Qualified Professional and to the satisfaction of EAO.	N/A	Instructions to Holder.

APPENDIX D. DETAILED REVIEW COMMENTS - EXAMPLE

Note: The comments below are generalized/hypothetical examples only. Holders should always refer to the EAO's comments regarding their specific Management Plan.

Comment No.	Plan Section	Specific Text (If Applicable)	EAO Comments/Instructions
1	5.3 Monitoring Schedule	Entire Section	The Water Quality Management Plan (WQMP) identifies a schedule for the implementation of water quality monitoring throughout Construction; however, a schedule for evaluating the effectiveness of mitigation measures is not identified. Revise the WQMP to include a schedule for evaluating the effectiveness of mitigation measures.
2	General	N/A	Activities identified in the WQMP are limited to In-Water Works; however, Construction includes all activities occurring during the Construction phase of the Project (e.g., access, staging, equipment mobilization, site preparation, etc.). Revise the WQMP to include all Construction activities which have the potential to result in adverse effects to water quality. If no other activities are identified, state this within the plan and provide rationale.
3	2.4 Exclusions	"The WQMP excludes any activities related to transportation and mobilization of equipment and materials."	Construction activities are not limited to In-Water Works. Revise the WQMP to include all Construction activities which occur within the project footprint as defined by the Certified Project Description, including activities related to transportation and mobilization of equipment and materials.
4	6.1 Corrective Actions	Entire Section	The WQMP identifies corrective actions to potential mitigate adverse effects to water quality resulting from Construction; however, triggers/thresholds for the implementation of corrective actions associated with exceedances of the BC Water Quality Guidelines (BC WQG) are not identified. Revise the WQMP to identify triggers/thresholds for the implementation of corrective actions that reflect exceedances of the BC WQG.
5	General	"Water quality monitoring in Creek A will be initiated as soon as practical once Construction commences in Project Area 1." "If adverse effects to water quality are observed, corrective actions described in Section 6.1 will be implemented as required."	Statements in the WQMP that use words/phrases including "as soon as practical" and "as/if/where required/possible/warranted/feasible" require measurable, accountable and timebound language. Specificity is necessary for the plan to meet its enforceable language Requirements. If the Holder wishes to provide flexibility in management, such terms may be used only with clear indication of the situation, triggers/thresholds or decision-maker(s) for what is not required, possible, warranted or feasible, and contingency mitigation measures that will be implemented instead. For example, if the Holder states "if possible, X action will occur", the Holder must also state "if not possible, then Y action will occur".

APPENDIX E. HOLDER RESPONSES TO EAO COMMENTS/INSTRUCTIONS - EXAMPLE

Note: The comments below are generalized/hypothetical examples only. Holders should always refer to the EAO’s comments/instructions regarding their specific Management Plan.

Comment No.	Plan Section	Specific Text (If Applicable)	EAO Comments/Instructions	Holder Response
1	5.3 Monitoring Schedule	Entire Section	The Water Quality Management Plan (WQMP) identifies a schedule for the implementation of water quality monitoring throughout Construction; however, a schedule for evaluating the effectiveness of mitigation measures is not identified. Revise the WQMP to include a schedule for evaluating the effectiveness of mitigation measures.	Section 5.3 has been revised to include the following schedule for mitigation measure effectiveness evaluation: • Prior to Construction • Construction Month 1 (i.e., January 2025) • Every 3 months following start of Construction (i.e., March 2025, June 2025, September 2025, etc.) • End of Construction (anticipated December 2026)
2	General	N/A	Activities identified in the WQMP are limited to In-Water Works; however, Construction includes all activities occurring during the Construction phase of the Project (e.g., access, staging, equipment mobilization, site preparation, etc.). Revise the WQMP to include all Construction activities which have the potential to result in adverse effects to water quality. If no other activities are identified, state this within the plan and provide rationale.	Sections 2, 4, 5 and 6 have been revised to include the following activities: • Access creation/upgrades • Mobilization/staging • Site preparation and project start-up
3	2.4 Exclusions	“The WQMP excludes any activities related to transportation and mobilization of equipment and materials.”	Construction activities are not limited to In-Water Works. Revise the WQMP to include all Construction activities which occur within the project footprint as defined by the Certified Project Description, including activities related to transportation and mobilization of equipment and materials.	Sections 2, 4, 5 and 6 have been revised to include all Construction activities which occur within the project footprint.
4	6.1 Corrective Actions	Entire Section	The WQMP identifies corrective actions to potential mitigate adverse effects to water quality resulting from Construction; however, triggers/thresholds for the implementation of corrective actions associated with exceedances of the BC Water Quality Guidelines (BC WQG) are not identified. Revise the WQMP to identify triggers/thresholds for the implementation of corrective actions that reflect exceedances of the BC WQG.	A new subsection (i.e., Section 6.5) has been added to the adaptive management plan which includes a Trigger Response Plan describing the thresholds above the BC WQG at which various corrective actions will be implemented.
5	General	“Water quality monitoring in Creek A will be initiated as soon as practical once Construction commences in Project Area 1.” “If adverse effects to water quality are observed, corrective actions described in Section 6.1 will be implemented as required.	Statements in the WQMP that use words/phrases including "as soon as practical" and "as/if/where required/possible/warranted/feasible" require measurable, accountable and timebound language. Specificity is necessary for the plan to meet its enforceable language Requirements. If the Holder wishes to provide flexibility in management, such terms may be used only with clear indication of the situation, triggers/thresholds or decision-maker(s) for what is not required, possible, warranted or feasible, and contingency mitigation measures that will be implemented instead. For example, if the Holder states "if possible, X action will occur", the Holder must also state "if not possible, then Y action will occur".	Ambiguous language has been removed or replaced and additional details regarding triggers for adaptive management, including personnel responsible have been added to the WQMP.