

A. Views on the Current Professional Reliance Model used in BC

A1. Please tell us what you think is working well with the current professional reliance model in BC, and what is not.

Professionals engaged in environmental assessment generally work to the highest of ethical and competency standards, and take pride in the quality of their work. However, in many instances their contracts do not allow sufficient time to perform the level of assessment that they would wish to, and the resulting recommendations may lead to unfavourable land use decisions. Moreover, professionals in the employment, especially regular employment, of any particular company or agency, may be subject to compromising their reports to fit their employers' agendas. Professional opinions from experts inside of government, vested in representing the public interest, very often differ from professional opinions of experts in the employ of development proponents. It has come to our attention that citizen groups in some jurisdictions here have been disappointed with the results of the professional reliance model as it relates to land development practices. Headlining issues such as Mount Polley, the Testalinden Creek dam failure, and Shawnigan Lake are likely only representative of other instances of damage to our forests, communities and wildlife. We believe that a gap exists between the assessments and information produced by the QEP's prior to project inception and the ear of the public. This concerns us, given, for example, the amount of logging that occurs on crown land, and the critical status of many wildlife species that have and continue to suffer negative impact by industrial forestry (e.g., northern goshawk, marbled murrelet, Western-screech owl, etc.).

A2. What changes, if any, are needed to maintain or improve public trust in the professional reliance model?

We favour greater government involvement and oversight to ensure best practices. We also wish for greater local citizen involvement to inform projects that impact communities and ecosystems. The process of ratifying land use changes must be coupled with strong environmental protection standards. Government could legislate mandatory public review to attain transparency of natural resource management, to gather input and to critique outcomes. Qualified BC Public Servants with relevant education and experience must be

involved with all major resource management decisions. Their reports and opinions must be public and available upon request. Seldom, if ever, should a Freedom of Information Request be required to obtain their reports. Final decisions about land use must come from government, not private vested interests.

Professionals working in resource management face more uncertainty in their decisions than do professionals practicing engineering or medicine. Consequently, interpretations and recommendations by Resource Management Professionals can vary widely from one another without incurring risk of malpractice. When the Professional Reliance Model continues to be used, we ask that the government ensure that resource companies retain only non-biased qualified environmental professionals who practice in compliance with provincial and federal environmental legislation and obligations (e.g., Convention on the Protection of Biodiversity). We echo West Coast Environmental Law's suggestion that government randomly select qualified professionals and assign them to companies, rather than have the professionals hired by the company. The results of professionals' work would determine whether or not the government, rather than industry, continues to hire them.

A3. Do you have any other observations or recommendations you would like to make about this review?

BC Nature supports this review process. It is very important that the public trusts the government to do its best for a safe and sustainable future. Our government has a constitutional obligation to steward natural resources in the public interest. In our opinion, the Professional Reliance Model has not served British Columbians as well as the previous system, where Qualified Public Servants made resource management decisions and monitored the results. We request more assurance that the legal responsibilities of resource extraction companies to manage wildlife and their habitats are accounted for under the following acts: BC Forest and Range Practices Act and accompanying Identified Wildlife Management Strategy; BC Wildlife Act; Federal Species at Risk Act; and Federal Migratory Birds Convention Act.

We therefore recommend significantly more government involvement at the inception of, in the working of, and at the conclusion of resource extraction projects. BC Nature asks to be consulted with regards to our response, and receive notification of any policy changes with associated rationale. We

appreciate the opportunity to be part of a process that allows us to honour our motto: "know nature and keep it worth knowing".