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January 19, 2018

File Number: 0420-20

via e-mail: CitizenEngagement@gov.bc.ca

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
Room 112 Parliament Buildings
Victoria, BC V8V 1X4

Dear Minister Heyman:

Re: Review of Professional Reliance Model

I am writing to you in regards to the Province's decision to conduct a review of the professional reliance model used in the natural resource sector. I understand that under this model government sets the natural resource management objectives or results to be achieved, and professionals hired by proponents decide how those objectives or results will be met.

We see that a strength of the current system is that most of the Qualified Environmental Practitioners (QEPs) in the province have membership in professional associations such as the Association of Professional Engineers and Geoscientists of BC or the College of Applied Biology. Membership in good standing within these associations allows for self-governed practice within the discipline.

However, we have concern that the regulatory model allows for instances when clients' interests may be put ahead of sustainability and compliance. We encourage government leadership for new regulations allowing local governments to develop qualified vendors lists and terms of reference for QEPs. This would help local governments ensure that the reports from professionals address the specific needs of the community.

We also encourage increased provincial staff capacity and resources for provincial assessment of land use proposals and other environmental matters. Where the professional reliance model is used, we believe there should be more rigorous oversight by ministry staff to ensure that the professionals are following established methodology. For example, ministry staff who are currently dealing with QEP reports under the Riparian Areas Regulation do not have any authority to reject a report that does not follow established methodology. This results in the local government receiving a QEP report that may or may not meet the methodology established in the *Riparian Areas Act*.

We would appreciate it if you would also consider environmental assessment practices as part of the review. In a 2015 [letter](#) to the B.C. Environmental Assessment Office (EAO) about improving public participation in environmental assessment I noted, on behalf of the Islands Trust Council, that to address

.../2

community concerns members of the public do not have the same ability as the proponent to provide expert reports for environmental assessment processes, the EAO should:

- hire the expert consultants and charge the proponent for the consulting costs, and/or
- provide funding to public interest intervenors to hire qualified experts to interpret and verify the proponent's information and ensure that there is a formal avenue for submission of public evidence.

Thank you for considering this input. The Islands Trust Council is a federation of local government bodies representing 26,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5200 square kilometres.

Yours sincerely,



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cc: Cowichan Tribes
Esquimalt First Nation
Halalt First Nation
Homalco First Nation
Hul'qumi'num Treaty Group
K'omoks First Nation
Klahoose First Nation
Laich-kwil-tach Treaty Society
Lake Cowichan First Nation
Lyackson First Nation
Malahat Nation
Musqueam First Nation
Nanwakolas Council
Pauquachin First Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
Semiahmoo First Nation
Shíshálh (Sechelt) First Nation
Snaw-naw-as (Nanoose) First Nation
Snuneymuxw (Nanaimo) First Nation
Songhees First Nation
Squamish First Nation
Stz'uminus (Chemainus) First Nation
Te'mexw Treaty Association
Tla'amin (Sliammon) First Nation
T'Sou-ke (Sooke) First Nation
Tsartlip First Nation
Tsawout First Nation
Tsawwassen First Nation
Tseil-Waututh (Burrard Inlet) First Nation
Tseycum First Nation
We Wai Kai (Cape Mudge First Nation)
Wei Wai Kum (Campbell River First Nation)
Bowen Island Municipal Council
Islands Trust Council
Islands Trust website