



Salmon Beyond Borders' Suggestions for
[British Columbia's Environmental Assessment Public Engagement Survey](#)

This survey is 30 questions long and takes approximately 30 minutes to complete. Our hope is that by providing some suggestions, we can help guide your answers to reflect the need for rigorous environmental assessments in shared transboundary watersheds.

[If you have ample time, please also see the attached briefing packet from West Coast Environmental Law prior to tackling the survey.](#)

Additionally, if you want to let BC know how you feel about this form of public engagement, [let them know!](#)

Questions 1-7 are predominantly focused on who you are and what your background is.

The rest of the questions from the survey can be found below, with **our suggestions listed in bold.**

8. Please indicate how much you agree with the following statement: There are project categories that should be added to the Reviewable Projects Regulation.

Strongly Agree

9. Please share with us what project category(s) should be added to the RPR

**Only answer this question if the following conditions are met: Answer was 'Strongly agree' or 'Agree' at question '8 [q008]' (Please indicate how much you agree with the following statement: There are project categories that should be added to the Reviewable Projects Regulation.)*

Projects that have impacts outside of B.C. jurisdiction

10. Please share with us why the project category(s) should be added to the RPR

Click "The adverse impacts of these project category(s) are not being sufficiently considered by the existing permitting or regulatory frameworks"

11. Please indicate how much you agree with the following:

The Reviewable Projects Regulation includes some project categories that should be removed from the Regulation

Disagree

***When SBB did the survey, it jumped from Question 11 to Question 14, skipping 12-13.**

14. Please indicate how much you agree with the following:

Project Design thresholds are an important factor to determine if a project is likely to cause adverse effects, and therefore trigger an environmental assessment.

Agree

15. Please indicate how much you agree with the following:

Project design thresholds are enough information to determine if a project is likely to cause adverse effects, and therefore trigger an environmental assessment

Disagree

16. Do you have any feedback on the proposed changes to the Project Design Thresholds outlined in the Intentions Paper on pages 13-20

(<https://www2.gov.bc.ca/assets/download/FDD409EE186245879E6190531713074D#>)

1) Restore the “original” thresholds (i.e. those enacted in 1995 under the first Environmental Assessment Act) for mineral mines and coal mines, namely 25,000 tonnes/year of mineral ore for mineral mines and 100,000 tonnes/year production of coal.

2) Calculate production thresholds based on what is extracted from the environment, not what the proponent intends to sell.

3) BC must provide the data necessary to evaluate whether the proposed new threshold for placer mines would actually result in assessment of any placer mines. Ultimately, the threshold must ensure that placer mines with potentially significant impacts undergo assessment.

4) Abandon the proposal to exempt oil and gas proponents from assessments for extracting deep groundwater and disposing of contaminated water in deep wells.

5) Include a class assessment of mobile thermal treatment of drilling mud, rather than exempting it from assessment.

17. Please tell us how much you agree with the following:

Effects Thresholds are an important factor to determine if a project is likely to cause adverse effects, and therefore trigger an environmental assessment.

Strongly agree

18. Are there Effects Thresholds other than linear disturbance, area land disturbance, green house gas emissions, or overlap with prescribed protected areas that could be used to determine the potential adverse impacts of a project, based solely on the project design or features of a project? The criteria must be able to be determined without a lot of testing or data collection.

The thresholds that apply to mining (production-based and impact-based) should be more stringent when there are downstream impacts to other jurisdictions.

19. Do you have any feedback on the Effects thresholds outlined on page 21 of the Intentions paper

(<https://www2.gov.bc.ca/assets/download/FDD409EE186245879E6190531713074D>)

1) GHG threshold at 50,000 tonnes/year; our fallback is that, at minimum, it must be 1% of BC's 2050 target, which would be weaker at 127,000 tonnes/year (but still a lot better than their proposal of 1% of the 2030 target, which is 382,000 tonnes/yr). Any project that exceeds 1% of BC's 2050 climate target rather than using the 2030 target. Apply this threshold to all projects of any type, not just the categories of projects already listed in the RPR.

2) Significantly lower the proposed disturbance-based threshold for prescribed projects to 75 hectares.

3) Apply the new (strengthened) impact-based thresholds to upstream development activities (oil and gas and mining).

4) Remove the provision exempting water uses approved under section 10 of the Water Sustainability Act from the assessment requirement for water withdrawals.

5) Remove the requirement to determine significant adverse effects from the threshold that would require EA for prescribed projects that overlap with a listed protected area.

20. Please indicate how much you agree with the following:

Requiring proponents to submit a notification to the EAO if the project:

- requires a federal impact assessment, but it is not wholly on federal land are within 15% of the Project Design Threshold

- or has a maximum annual direct employment of at least 250 people is enough to ensure the EAO can track projects that might require an environmental assessment that do not meet the requirements of the reviewable project regulation.

Disagree.

21. Please indicate how much you agree with the following:

- For projects that have never received an Environmental Assessment (EA) Certificate (i.e., they were either initially constructed prior to the rest Environmental Assessment Act coming into force in 1995, or below the EA reviewability thresholds), the proponent should be required to notify the EAO if they intend to modify the project, where the modified project would exceed the threshold for new projects in that category.

Strongly Agree.

22. Are there other notification thresholds that could help the EAO track projects that might require an environmental assessment, but do not meet the requirements of the Reviewable Projects Regulation?

The RPR should require that all notifications are promptly posted online, require notification for any modifications of existing projects that would cause the project to exceed the threshold for a new project in that category.

23. Would you like to provide feedback on the Prescribed Protected Areas Appendix of the Reviewable Projects Regulation Intentions Paper? *

Yes

24. Please indicate how much you agree with the following:

Making environmental assessments mandatory for projects within the Prescribed Category of Projects that are proposed within a Prescribed Protected Area, is a good way to get proponents to consider how their proposed projects could interact with protected areas from the earliest stages of project design, providing an opportunity for proponents to adjust their design to avoid overlaps with prescribed areas, therefore minimizing adverse effects.

Agree

25. Are there other ways the Environmental Assessment Ofce could get proponents to consider how their proposed projects could interact with protected areas from the earliest stages of project design?

Require project proponents adhere to the United Nations Declaration on the Rights of Indigenous Peoples and Free, Prior, and Informed Consent, including recognition of Indigenous protected areas. (And #26 reccs)

26. Do you have any feedback on the proposed Prescribed Protected Areas for inclusion in the regulation?

Provide an ability for another jurisdiction (including Indigenous nations and local government, and governments of neighbouring states) to request that the Minister recommend to Cabinet that one or more thresholds in the RPR (for project design, impacts or notification) be lowered in a region impacting that jurisdiction, in order to account for cumulative impacts, a particularly sensitive area or important habitat, with a requirement for the Minister to issue a public response to that request.

27. Do you have any feedback on the protected or managed areas not proposed for inclusion?

These all must be included, especially the Mineral Tenure Act, Great Bear Rainforest Act, Water Sustainability Act, and Wildlife Act.