



Ministry of
Environment and
Climate Change Strategy



Professional Reliance Review

What We Heard

*Public and Stakeholder Engagement
December 1, 2017 – January 19, 2018*

Prepared for
The Ministry of the Environment and Climate Change Strategy

Prepared by
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Executive Summary

The BC Ministry of the Environment and Climate Change Strategy (The Ministry) is currently reviewing the Professional Reliance Model being used in the natural resource sector to ensure the highest professional, technical, and ethical standards are being applied to resource development in British Columbia. As part of this effort, the Ministry has engaged citizens, Qualified Professionals, and users of Qualified Professionals, asking for feedback.

This report highlights the findings associated with the project on the review of the Professional Reliance Model and the use of Qualified Professionals in the British Columbia natural resource sector.

Respondent Views on the Current Professional Reliance Model

Overall, across all respondent groups, many survey respondents (39%) felt the provincial government's use of Qualified Professionals to inform natural resource and environmental decision-making is appropriate. However, a slightly higher proportion of respondents (43%) did not feel the provincial government's use of Qualified Professionals is appropriate. Examining views on the provincial government's use of the current Professional Reliance Model by respondent group, First Nation / Aboriginal participants (54%) and citizens (74%) were more likely to feel that government use of Qualified Professionals is not appropriate, as compared to 47% of users of Qualified Professional information. As might be expected, more Qualified Professionals felt government use of the current Professional Reliance Model was appropriate (49%), than felt this was not the case (29%). First Nation / Aboriginal participants, users of Qualified Professionals, and citizens suggested there is an increased need for professional association and government oversight.

Over one-half of participants indicated that the current Professional Reliance Model does not provide an adequate balance between environmental protection and resource development. Many felt there were issues of conflict of interest when resource developers in various natural resource industries directly hire Qualified Professionals.

About one-half of respondents thought the current Professional Reliance Model is not transparent. These respondents pointed to a need for increased transparency and inclusiveness in environmental protection and resource development decision making.

Many survey participants believed professional associations and the provincial government, respectively, do not provide an adequate level of oversight for Qualified Professionals (46% and 59%, respectively). However, just over half of Qualified Professionals surveyed (51%) felt professional associations are providing appropriate oversight. When commenting on the Professional Reliance Model several respondents (17%) indicated that the provincial government is not taking responsibility for the protection of the environment by using the Professional Reliance Model.

Qualified Professional's Views on Administration of the Model and Accountability

Just over one-half of Qualified Professionals felt those using qualified professional information either disregard or try to influence the advice or direction provided by Qualified Professionals. The majority of Qualified Professionals responding to the survey believed governing bodies, such as professional associations, are effective at assessing the competency of Qualified Professionals. Additionally, most Qualified Professionals felt the complaints and discipline processes in place effectively hold Qualified Professionals accountable for the work they do.

Further, when commenting on their decision-making, the majority of Qualified Professionals indicated that there were no issues with delegation of decision-making. However, Qualified Professional comments indicated they were divided in their beliefs regarding the checks and balances that are in place to protect the public interest. Many Qualified Professionals felt the public interest is protected while almost as many Qualified Professionals indicated the public interest is not protected.

Suggested Changes to Maintain or Improve Public Trust

All respondent groups' suggestions for maintenance or improvement of public trust highlight a perceived need for more provincial government and professional association oversight, increased auditing, compliance, and enforcement of regulations in the natural resources sector, and increased transparency in the Professional Reliance Model and the use of Qualified Professionals.

Other Observations and Recommendations

There were consistent themes demonstrated across respondent groups. Three themes consistently arose across the comments coded: the need for more provincial government and professional association oversight (general oversight); perceived prioritization of companies' economic needs at the expense of environmental protection (lack of environmental protection); and the need for increased transparency to the public (transparency).

Overview

The BC Ministry of the Environment and Climate Change Strategy has reviewed the Professional Reliance Model (PRM) being used in the natural resource sector (NRS) to ensure the highest professional, technical, and ethical standards are being applied to resource development in British Columbia. As part of this effort, the Ministry engaged citizens, Qualified Professionals (QPs), and users of QPs, asking for feedback.

Background

The provincial agencies responsible for authorizing the use of natural resources in British Columbia are exploring whether the provincial government's current system of reliance on QPs results in the effective and efficient administration of natural resource authorizations. The successful use of QPs in the natural resource sector requires that QPs are properly qualified and accountable for the quality of work they complete.

QPs in the NRS come from a variety of disciplines, work in a variety of commercial or industrial sectors, and provide knowledge and expertise to support decision-making and operational activities in the NRS. As such, QPs play a significant role in the authorization and management of natural resources in BC.

Using the PRM, QPs provide monitoring, inspections, data reviews, and audits, as well as performing other activities to determine if an authorized individual or business is compliant with the requirements in the applicable statutes, regulations, and authorizations. With the current review of the PRM the Ministry of the Environment and Climate Change Strategy examined the PRM to ensure it is adequacy in upholding the highest environmental standards and ensuring the appropriate use of BC natural resources, with part of this process including examination of whether QPs employ best practices to protect the public interest under the PRM.

Methodology

As part of the PRM review process, the BC Ministry of the Environment and Climate Change Strategy engaged citizens, QPs, and users of QPs, asking for feedback about the PRM and QP use. Over 4,600 individuals participated by providing input via a General Public Survey (n = 2,449), a QP Survey (n = 1,802), written comments provided by the general public via e-mail (n = 279), and formal submissions provided by experts and stakeholder organizations who were invited to provide input (n = 119) that has been published online.

The General Public Survey was open to everyone and includes input from a range of individuals, including members of First Nations, users of QP information, and QPs themselves, as well as other citizens who were interested in providing their input. The QP Survey, invitations for which were sent only to QPs, included a number of the same questions as well as including some additional questions aimed at QPs. Invitations to the QP Survey were sent to members of the following associations: Engineers and Geoscientists BC (EGBC), Applied Science Technologists & Technicians of British Columbia

(ASTTBC), British Columbia Institute of Agrologists (BCIA), College of Applied Biology (CAB), and Association of BC Forest Professionals (ABCFP).

Responses to the QP survey were integrated with responses to the General Public Survey, and the results analyzed by respondent group.

Qualitative responses to the surveys were stored in a separate database for coding. Inductive content analysis of the qualitative responses was performed, allowing for identification of key themes. As there was a very strong response to this engagement survey, a random representative sample of 35% of all surveys was selected for thematic coding of qualitative responses.

When reviewing the information presented, five caveats should be kept in mind.

1. The results from this engagement should not be considered a statistically valid approximation of BC's population.
2. The survey was anonymous thus survey participants may have completed more than one submission.
3. Writing campaigns may have been launched by various groups, providing identical or very similar submissions.
4. There are few self-identified members of First Nations (n = 41), therefore findings with respect to the opinions of this respondent group need to be interpreted with caution.
5. Respondents to the QP Survey were members of EGBC, ASTTBC, BCIA, CAB, and ABCF. Their responses were combined with the responses of QPs who responded to the General Public Survey. QPs responding to the General Public Survey, as a group, were slightly more negative in their opinions as when compared to QPs responding to the QP survey. However, the QPs participating in the General Public Survey only represented 21% of the overall QP aggregate across both surveys, thus minimizing any overall negative effects.

Online Surveys and Public Comment Results

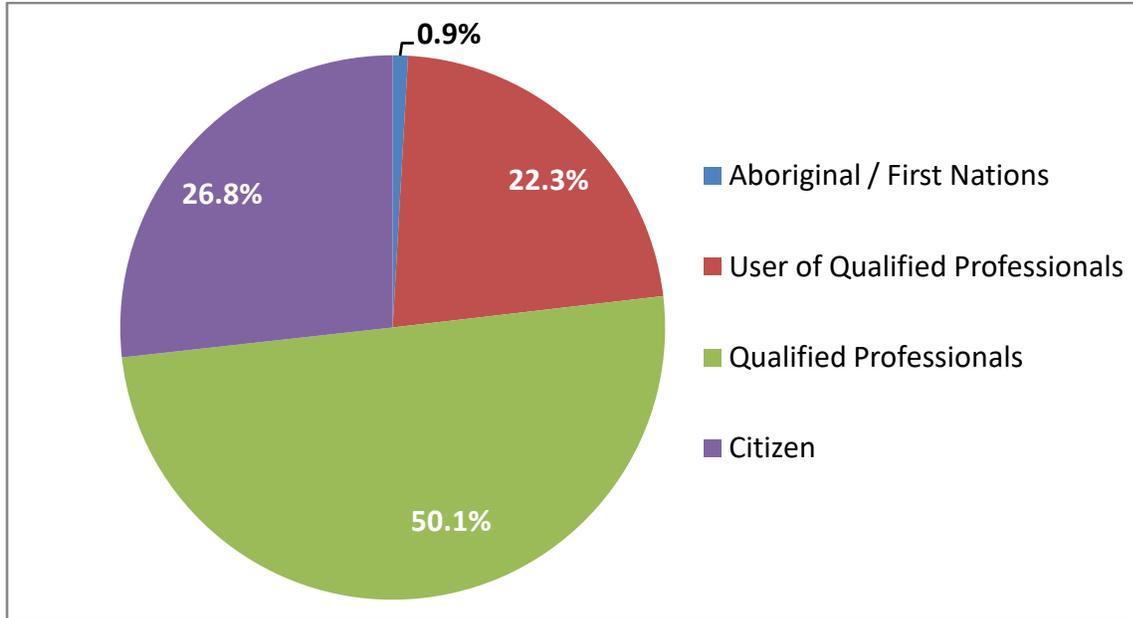
Respondents Role and Background

More than 4,600 individuals responded to the Professional Reliance engagement. Of those who responded to the engagement, 1,802 QPs participated in the QP Survey, 2,249 individuals participated in the General Public Survey, 279 provided written submissions, and 119 stakeholders posted submissions. The quantitative analysis presented in this report is based on the two surveys combined (n=4,251). Opinions and information provided in written and posted submissions is also referenced.

General Public Survey participants indicated their interest in the review of the PRM by selecting one or more of the following: member of First Nation, user of QP information, QP, or citizen (member of the public). Survey participants were then assigned to a primary group according to the following hierarchy: member of First Nations, users of QP, QP, or citizen. As information was aggregated across both the General Public Survey and the QP Survey, the QP group includes QP who were invited to participate in

the QP Survey and individuals who completed the General Public Survey and identified themselves as QP. The total number of participants identifying as First Nation members was modest (n = 41).

Exhibit 1: Respondent Interest in the Professional Reliance Review



Respondents to all surveys, General Public Survey / Qualified Professionals / Written Submissions are included in totals.

Over 90% of survey respondents (94%, n = 4,005) provided information on past and/or current place of employment. Responses regarding other types of employment included education, health care, First Nations (including First Nations Government), retired, self-employed, and student.

Exhibit 2: Past or Current Place of Employment

Past/current place of employment	Percentage
Provincial government	37.7%
Local government	6.7%
Academic institution	9.8%
Private industry	35.4%
Consultant/Independent contractor	41.4%
Non-government organization (paid or volunteer)	9.2%
Qualified Professional Governing Body/Professional Association	3.5%
Industry Association	3.3%
Other	7.6%

Total % will sum to greater than 100% due to multiple responses

The type of employment varied by respondent group:

- Amongst users of QPs who responded to the General Public survey, more than half (57%) indicated employment with the provincial government, 37% were consultants or contractors,

one-third (33%) employed by private industry, and 15% employed by non-governmental organizations (NGOs), with multiple employers cited by many. Academic institutions, federal government, and local government were each cited by one-tenth of users of QPs, with input also provided by employees of QP governing bodies / professional associations (5%) or industry associations (3%).

- Over half (53%) of all QPs who responded (combining responses via the QP Survey with those via the General Public Survey) were consultants or independent contractors, with 39% indicating employment by private industry, and 35% by provincial government. QPs responding to the surveys also provide some perspectives from those employed by academic institutions, local government, federal government, NGOs, QP governing bodies, and industry associations (variously cited by between 3% to 7% of QPs). Again, many cited multiple employers (and some contractors may have cited government or private industry as ‘employers’ as their contracts are with organizations in these sectors).
- The small number of General Public survey respondents who self-identified as members of First Nations in B.C. were a mix of those employed by provincial government (43%), private industry (29%), academic institutions (26%), consultants or contractors (23%), and local government (17%), with some representation of other employer types (federal government, QP governing bodies / professional associations, industry associations).
- Of citizens who participated in the surveys (and did not self-identify as any of the other groups above), 30% were employed by private industry, 23% by provincial government, 15% by academic institutions, and 16% were consultants or contractors, with other employer categories being less common. One-quarter (20%) of citizens responding to the survey indicated ‘other’ employment (self-employed, retired, health care, education, etc.).

See [Appendix A](#) for details concerning past and current employment.

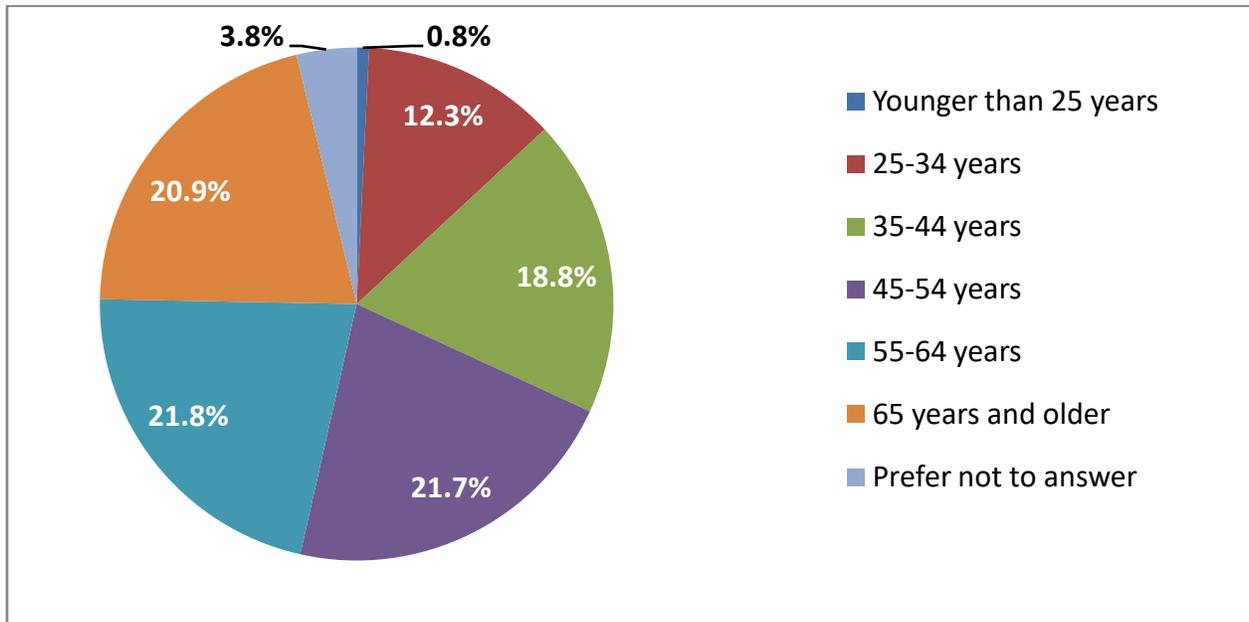
The majority (86%) of users of QP information have interacted with QPs in the area of resource use. Users of QP information also interacted with QPs in larger numbers in protection of habitats (74%) and infrastructure (52%). It should be noted that results for areas of interaction with QPs is not representative of all users of QP who responded to the survey as only those users of QPs who also self-identified as QPs responded to the question. The majority of QPs (73%) indicated that they were involved in resource use. Similar to users of QP information, many QPs were involved in protection of habitats (30%) and infrastructure (37%).

General Public Survey Respondents Role and Background

General Public Survey respondents were queried about their age and the region they lived in. Respondents’ age, by category, ranged from younger than 25 years to over 65 years of age.

The aggregated survey results reflect equal input from age groups above 35 years, with each age group accounting for approximately one-fifth shares of all surveys. However, proportionately fewer younger people provided input, with 12% being 25-34 years, and only 1% under 25. Citizens responding to the survey tend to be older than QPs and users of QPs, with 23% being 55-64 and one-third being 65 years or older. See [Appendix B](#) for details concerning age ranges.

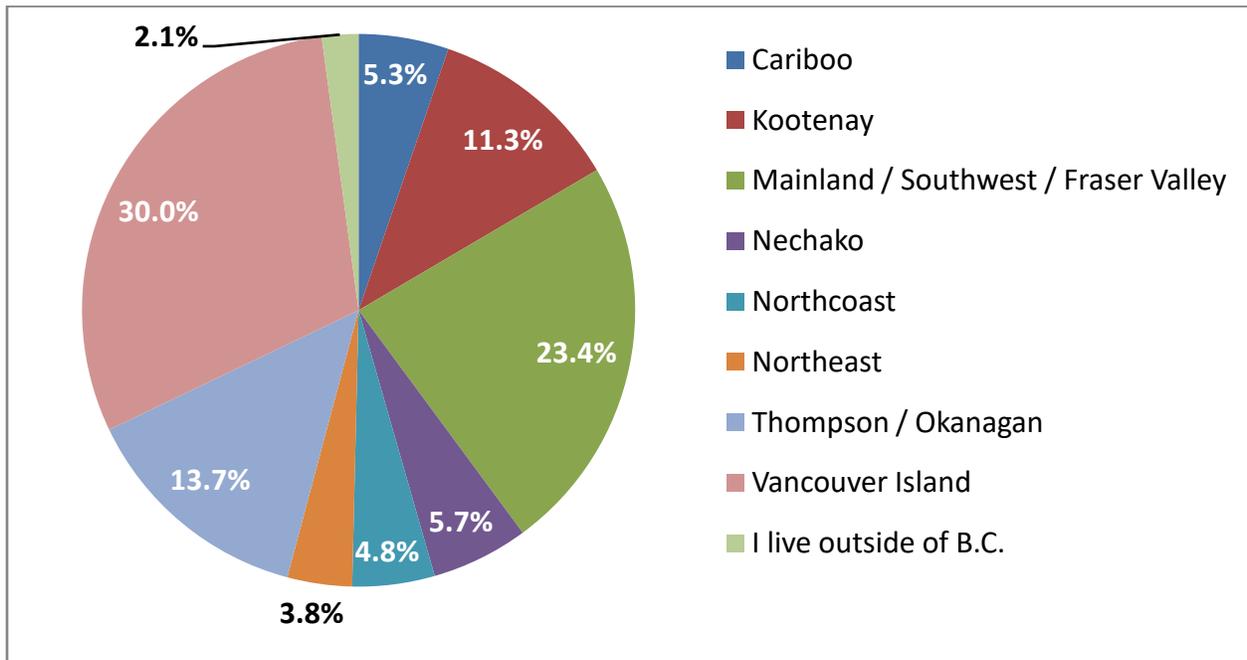
Exhibit 3: Respondent Age



Only respondents General Public Survey are included in totals.

The participants were from across BC, with the largest concentration of participants residing on Vancouver Island (30%) and the Mainland / Southwest / Fraser Valley (23%). Few participants (2%) indicated that they live outside of the province. Participant region for each group (i.e. member of First Nations, users of QP, QPs, and citizen) was generally similar to the aggregate. See [Appendix C](#) for details concerning region of residence.

Exhibit 4: Provincial Region Where Respondents Live



Only respondents General Public Survey are included in totals.

QP Survey Respondents Role and Background

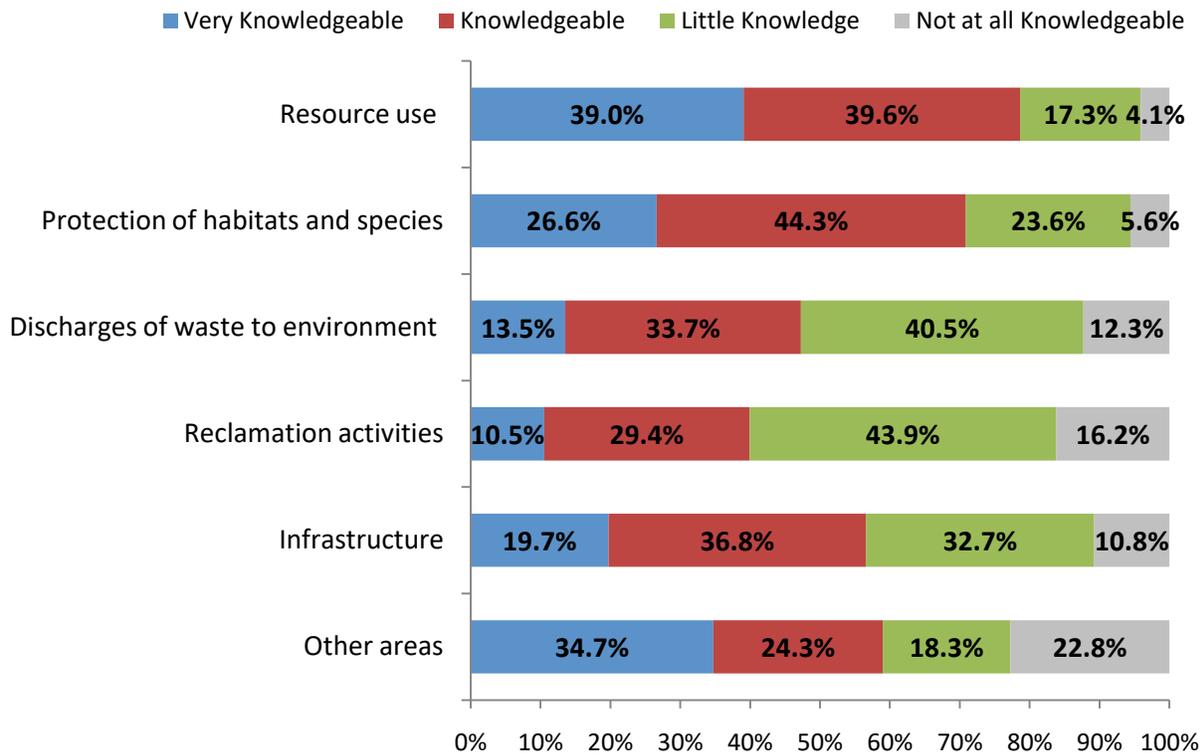
QP Survey participants were asked about their length of service, membership/ accreditation, and provincial regions where they served as QPs in the natural resources sector. Most have been QPs for more than 20 years (36.4%), with many working as QPs for 6-10 years (13%) or 11-15 years (13%) (see [Appendix D](#)). Most QPs belonged to, or were accredited by either the Association of BC Forest Professionals (35%) or the Engineers and Geoscientists BC (34%) (see [Appendix E](#)). QPs served in regions across BC, with many working in the Mainland / Southwest (34%) and on Vancouver Island / Coast (32%) (see [Appendix F](#)).

Respondents Level of Knowledge of Use of QPs

Survey respondents indicated their level of knowledge with respect to how QPs are used in several natural resource areas. Most felt knowledgeable about use of QPs with respect to resource use (79% selecting very knowledgeable or knowledgeable), and protection of habitats and species (71%). See [Appendix G](#) for information on expressed level of knowledge by natural resources sector.

While fewer respondents were knowledgeable about other areas of activity, all areas are reflected in the survey results, with at least 40% of respondents indicating good knowledge of QP use in each area. Further examination of the data revealed that, for users of QP information, and for QPs themselves, as might be expected, levels of knowledge of QP use are higher for the individual areas of activity in which they reported having interactions and involvement.

Exhibit 5: Level of Knowledge of Use of QPs



Respondents' Views on the Current Qualified Professional Reliance Model

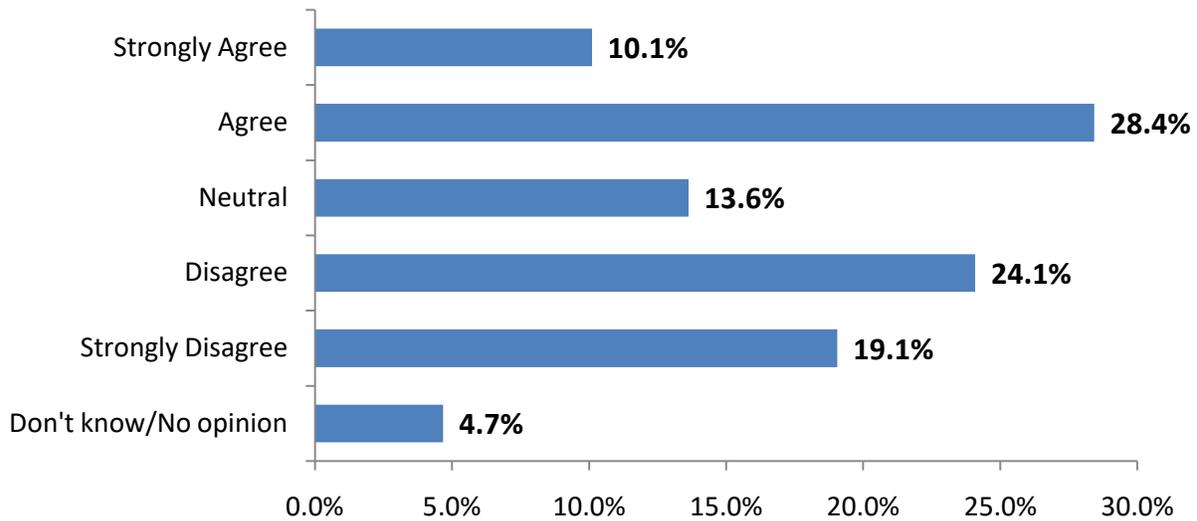
This section presents respondent views on the professional reliance model and the oversight of QPs. Results are broken out by respondent group: members of First Nations, users of QP advice, QPs themselves, and members of the General Public (with those having multiple interests assigned to a primary respondent group for analysis as previously explained). Information was aggregated across both the General Public Survey and the QP Survey, thus the QP group includes QPs who were invited to participate in the QP Survey and individuals who completed the General Public Survey and identified themselves as QPs. The total number of participants identifying as First Nation members was modest (n = 41).

STATEMENT:

The provincial government is using QPs appropriately in helping to inform natural resource and environmental management decision making.

Of the more than 4,200 individuals who responded to the Professional Reliance engagement surveys, opinion is mixed as to whether the provincial government is making appropriate use of QPs to inform decision-making on natural resources and environmental management. A total of 39% feel that government is making appropriate use of QPs, while 43% disagree, with the remainder indicating they are neutral or unsure. Examining opinion at either end of the scale, it may be noted that only 10% agree strongly, while 19% disagree strongly.

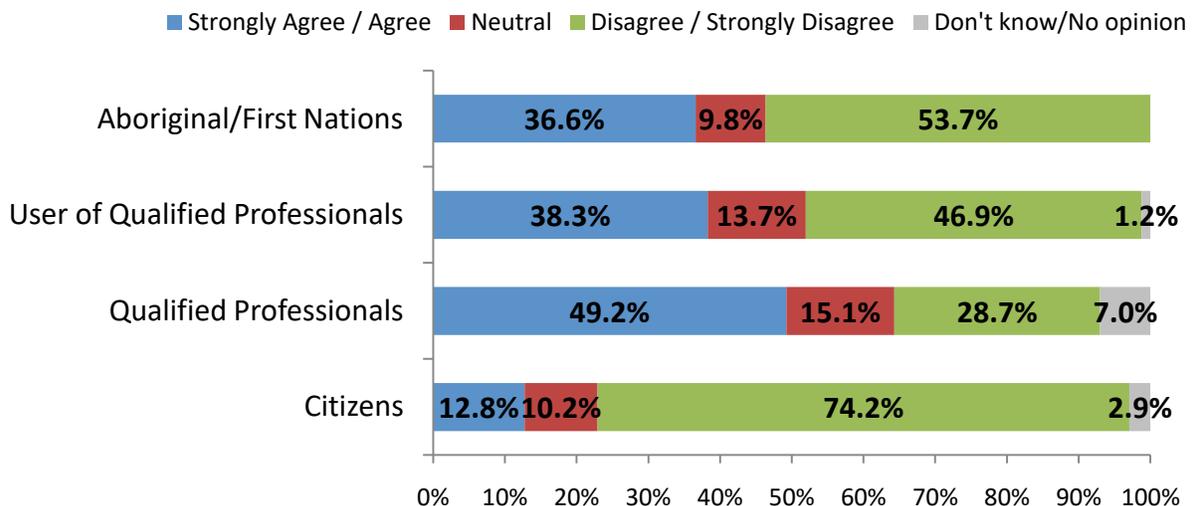
Exhibit 6: The Provincial Government is Using QPs Appropriately ...



As this engagement survey included a mix of participants, this overall result is best illuminated by breaking out the results by respondent type:

- About three-quarters (74%) of citizens (those with no experience as a QP or user of QP information) expressed dissatisfaction with QP use by the provincial government, with only 13% agreeing that QPs are used appropriately.
- Amongst users of QPs, opinion was split, but leaning toward the negative, with only 38% agreeing that QPs are used appropriately and 54% disagreeing.
- The same can be said for First Nations respondents, with 37% agreeing, and 54% disagreeing.
- QPs are also somewhat split on the issue, but leaning toward the positive, with half (49%) agreeing that QPs are used appropriately, and fewer disagreeing, at 29%.

Exhibit 7: The Provincial Government is Using QPs Appropriately ... (by Respondent Group)



Selected Comments Regarding QP Use

A significant number of comments addressed the use of QPs by the provincial government. While the feedback varied, one theme was salient: use of the PRM and QPs was not felt to be appropriate by many who provided opinions.

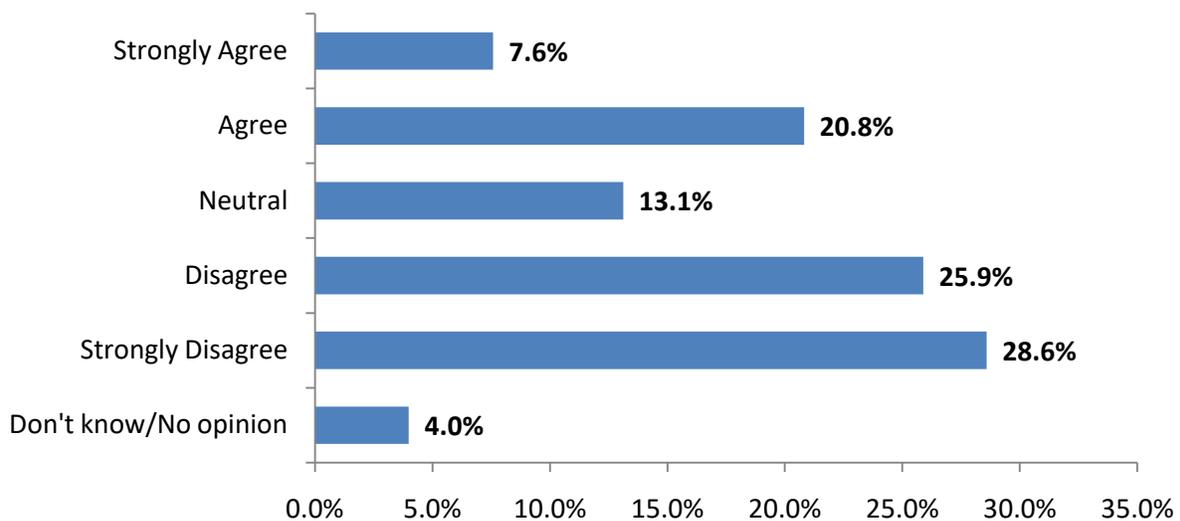
“Govt's deliberate actions to not have QP's working within the public service has reduced the ability to have or keep science-based knowledge as the basis for policy and regulatory decisions.”
QP

“‘Professional reliance’ constitutes abdication of responsibility on the part of government agencies that should speak and act *for* the public interest.”
Citizen

STATEMENT:
The current model strikes a suitable balance between environmental protection and resource development.

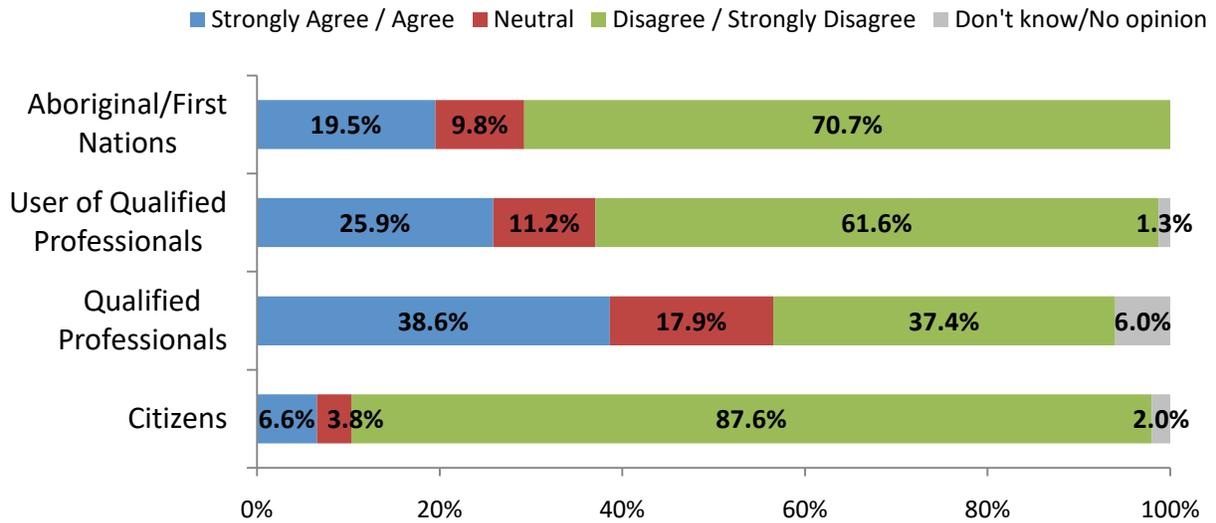
Most respondents believe the PRM does not strike a balance between what is required for environmental protection and what is occurring as a result of resource development. Over one-half (55%) think it does not strike a suitable balance (with 29% strongly believing this), compared to 28% who think it does (and only 8% who strongly feeling this).

Exhibit 8: The PRM Strikes a Suitable Balance between Environmental Protection and Resource Development



Examining responses by respondent group reflects the general beliefs expressed in the aggregate. Citizens are, however, most negative on this issue, with fully 88% believing that the PRM does not strike a good balance between environmental protection and resource management. Amongst QPs, opinion was divided, with almost as many agreeing as disagreeing (39% agree, 37% disagree), and the remainder indicating they were neutral or unsure (18% and 6%, respectively).

Exhibit 9: The PRM Strikes a Suitable Balance between Environmental Protection and Resource Development (by Respondent Group)



Selected Comments Regarding the Balance between the Environment and Resource Development

Many of the public comments collected expressed concern over the environmental damages and consequences that have occurred under the current system. Citizens often expressed concern over their belief that the current system favours resource development over the environment.

“The ‘PR model’ has been a stellar success in advancing corporate interests, and an abominable failure in protecting the public and the environment.”
Citizen

“As a citizen who has seen first-hand the degradation of some watersheds caused by resource extraction in BC, it is clear that the kind of "professional oversight" we've been using hasn't protected the ecosystems in the way that they need to be in order for future generations to have a good future.”
Citizen

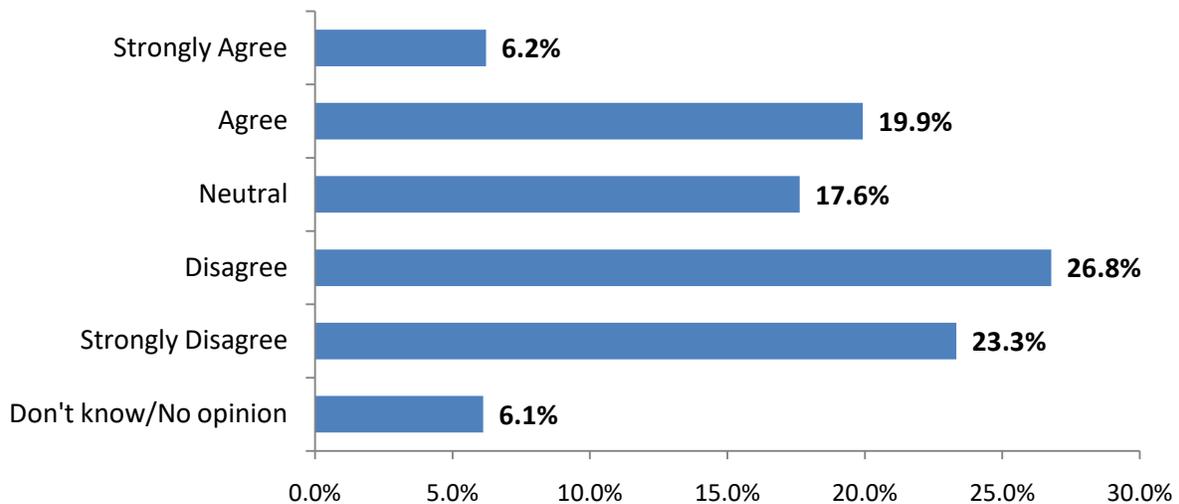
“[I]n the field of environmental protection, the professional reliance model is a very poor model for service delivery... Environmental protection is a socialized endeavor and can also be subjective and imprecise. Both of these features make it a poor candidate for professional reliance as there is too much scope for the self-interested private sector to exert influence to pursue "the bare minimum".
User of QPs

STATEMENT:

The current model is transparent in how QPs are used, including how they are selected and how they inform natural resource and environmental management decision making.

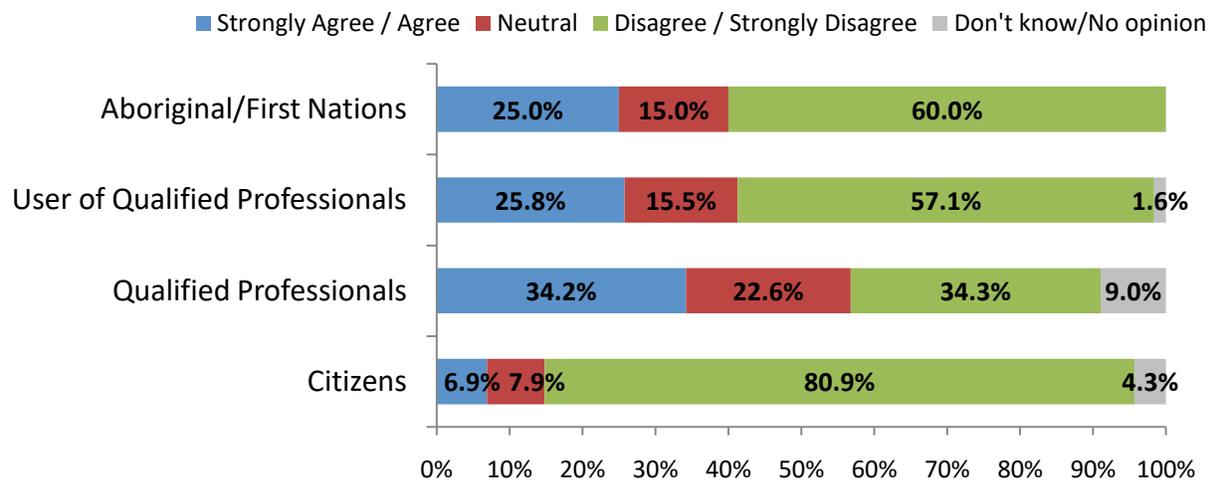
As with their views on the balance between environmental protection and resource development, many respondents thought the PRM is not transparent when it comes to how QPs are being used. One-half (50%) of all respondents think that the model is not transparent (with 23% strongly feeling this), as compared to 26% who think it is (with only 6% strongly believing this).

Exhibit 10: PRM Transparency and the Use of QPs



Breakdown of response by identified groups displays analogous feeling among these members of First Nations, users of QPs, and citizens. Again, QPs were split in their feelings, with just over one-third (34%) indicating the PRM is transparent and the same proportion (34%) thinking the model was not transparent when it came to selection and QP use.

Exhibit 11: PRM Transparency and the Use of QPs (by Respondent Group)



Selected Comments Regarding Transparency and the Use of QPs

While not directly addressing PRM transparency and QP use, comments did concern themselves with themes of transparency. Citizens often expressed feelings that they were being left out of any decision-making process.

"We need more transparency and inclusiveness in management of the provinces natural resources, if they are to be conserved and managed for the common good over the long term."

Citizen

Members of First Nations, users of QPs, and QPs also commented on the need for more transparency.

"[Communication] and honesty and some flexibility - at least listen to all sides."

First Nation / Aboriginal Participant

"[I]mprove transparency of information, including availability of site plans and prescriptions to government and the public."

QP

"There should be some greater openness and publicity so that concerned members of the public (including other QEPs) can scrutinize consultants' work... this would also provide the consultant QEPs with a much stronger argument to push back against client demands to 'water down' work."

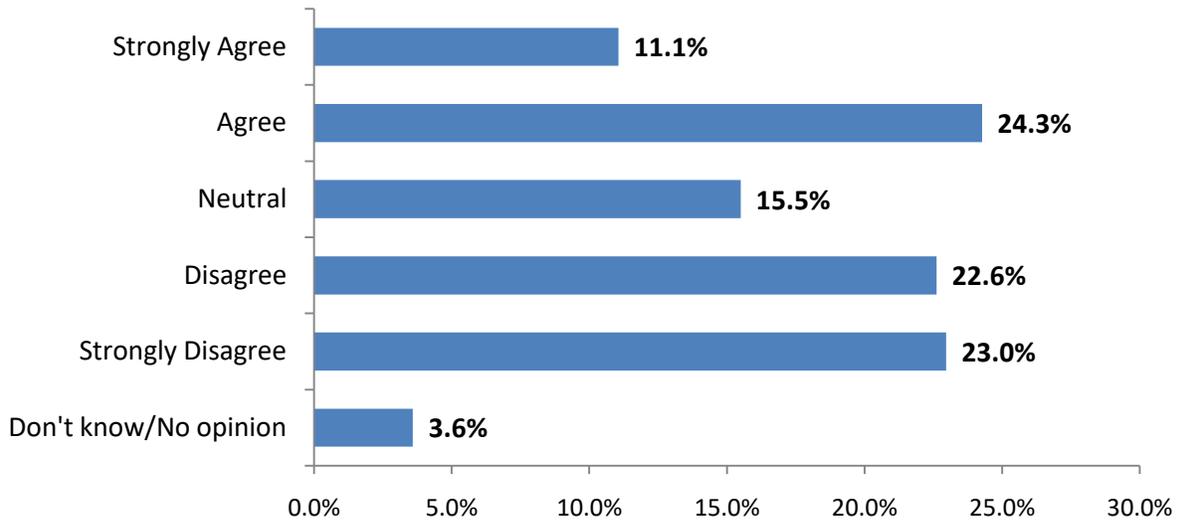
User of QPs

STATEMENT:

Professional associations provide the right level of oversight of work conducted by QPs.

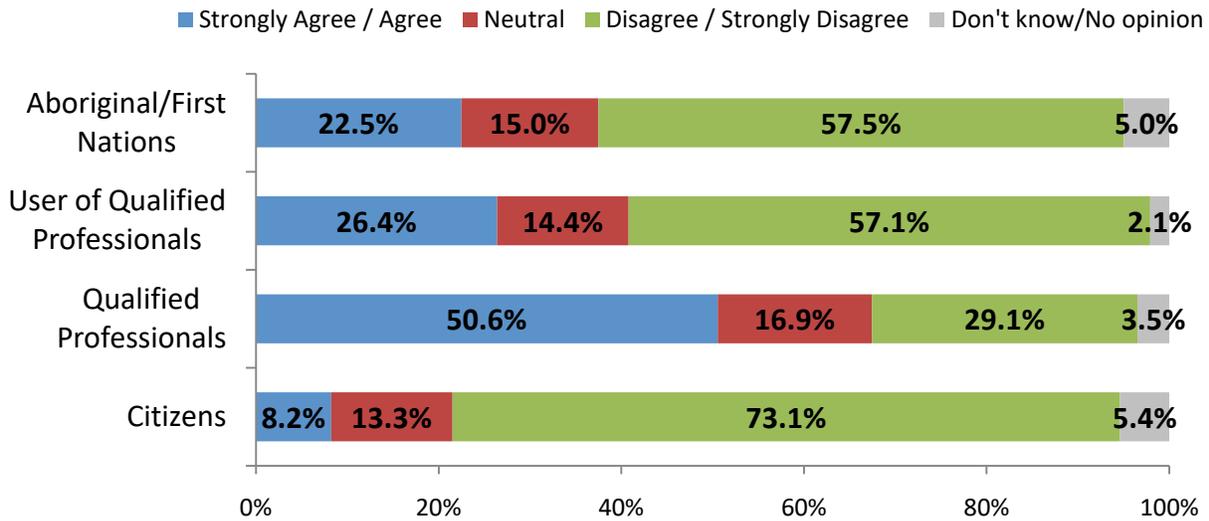
Over one-third of participants (35% agreeing or strongly agreeing) felt professional associations provided appropriate oversight for work being done by QPs. Almost one-half (46% disagreeing or strongly disagreeing) believed this was not the case.

Exhibit 12: Professional Associations and QP Oversight



Breaking out the responses by group reveals differences of participant group opinion on professional association oversight of QPs. One-half of QPs thought that the professional association oversight provides the right level of oversight (with only 29% disagreeing). Members of First Nations and users of QPs are more likely to disagree that the oversight provided by professional associations is appropriate (57% and 58%, respectively). Trust in oversight by professional associations is lowest amongst citizens, with fully three-quarters (73%) disagreeing with the statement and only 8% agreeing.

Exhibit 13: Professional Associations and QP Oversight (by Respondent Group)



Selected Comments Regarding Professional Associations and QP Oversight

Several comments highlight the need for a better accountability process for QPs and suggest professional organizations have more tools for disciplinary action available to them.

"We need to have experienced/qualified personal reviewing the work that are subject matter experts."

User of QPs

"The professional association needs to be somehow integrated into regulatory bodies (government) to better exert their influence."

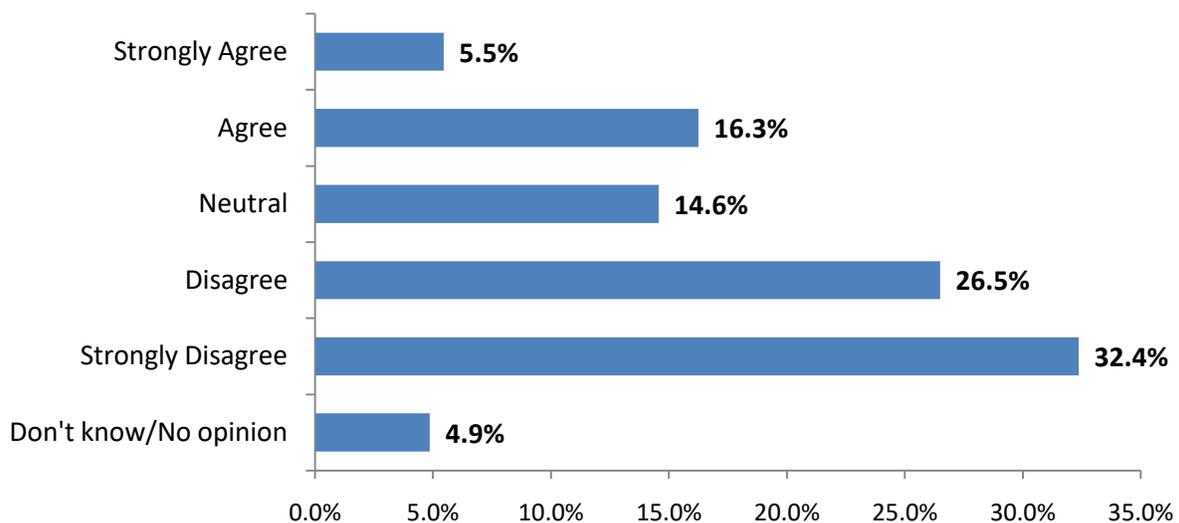
QP

STATEMENT:

The provincial government provides the right level of oversight of work conducted by QPs.

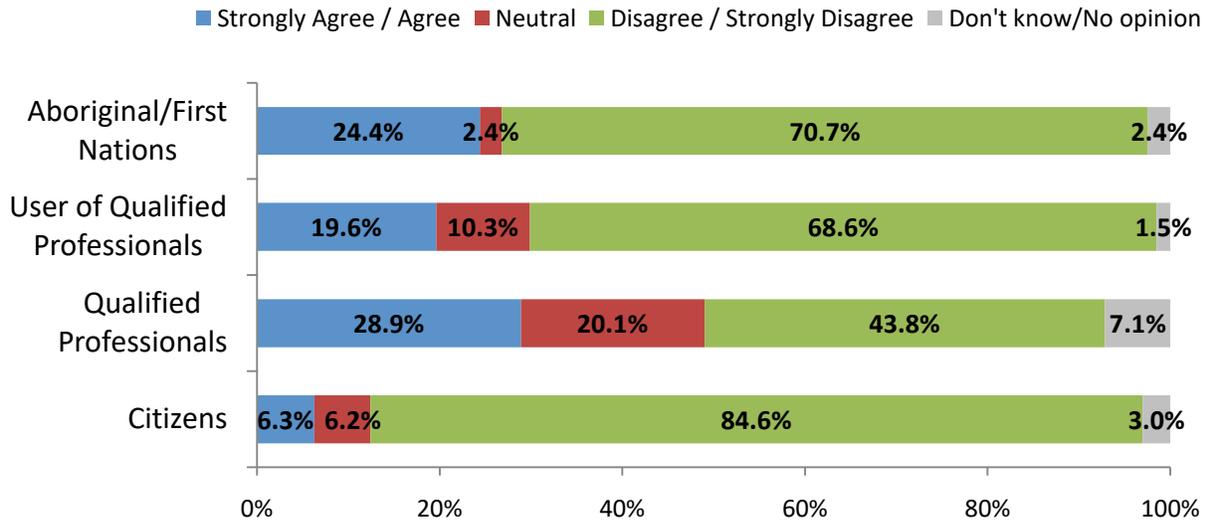
Many survey participants feel provincial government is not providing adequate oversight for QPs. Almost three-fifths of all respondents disagree, or strongly disagree that the level of oversight the provincial government is providing is adequate (27% disagree, 32% strongly disagree, totalling 59%).

Exhibit 14: BC Provincial Government and QP Oversight



Exploring survey participant response by group reflects the trends seen with the aggregate, with all groups feeling dissatisfaction with provincial government oversight of QPs. Again, it may be noted that the opinion of QPs is somewhat split on this, though leaning towards the negative, with 29% feeling that the provincial government provides adequate oversight but more, at 44%, feeling that provincial government does not provide the right level of oversight.

Exhibit 15: Provincial Government and QP Oversight (by Respondent Group)



Selected Comments Regarding the Provincial Government and QP Oversight

A significant number of comments addressed the use of QPs by the provincial government. While the feedback varied, one theme stood out: the provincial government should provide more oversight, with some survey participants suggesting that the provincial government hire QPs.

“We need to have a bigger government presence on the land base to ensure that the best interests of the environment and the people of BC are being met.”

User of QPs

“I do not believe the professional reliance model is a responsible workable model and would like to see the government take responsibility for setting rules and regulations that government enforces while providing more involvement and oversight.”

Citizen

“Qualified professionals reviewing projects should be employed by the government, not the companies promoting the project.”

Citizen

“[T]he public interest requires government to step up to the plate and face its responsibilities, not delegate management out to the private sector, to have their employees held up as professionals that will make the right choice for the public interest when their employer pressures them unseen to do otherwise.”

Citizen

Summary of Survey Comments Regarding the Current PRM

STATEMENT:

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

Survey respondents were invited to comment on the current PRM model. A random, representative sample (35%) of all surveys were coded by theme. Of the comments coded (n = 1,157), themes found included negative comments regarding the model (29%), positive comments regarding the model (20%), desire for greater government oversight (17%), worry that industry economic needs are prioritized over maintenance and care of the environment (15%), and negative comments regarding QP accountability (15%).

Comments on the PRM and use of QPs are mixed. For those commenting, several survey participants expressed positive attitudes towards provincial government use of QPs, with opinions focusing on the Qualified Professional Model.

“BC is leading the way in making environmental progress in North America because of the professional reliance model.”

Citizen

As might be expected from the survey results discussed thus far, there were negative attitudes expressed towards use of QPs, with themes centered on lack of government supervision and issues of QP accountability.

“ ... model relaxes the oversight from government on industry, ... [and] does nothing for the long term viability of our resources.”

User of QPs

Participants suggested that government needs to provide more oversight.

Further, a number of survey participants expressed beliefs that the model is not working and feel that QPs are not held accountable to standards of impartiality, or if they are, it is only through an auditing process that issues are corrected.

“[P]rofessionals are only held to account by audits, which are not regular, rarely assess professionalism, and focus more on business practices.”

QP

“The professional reliance model is fatally flawed in the expectation that professionals paid by resource users/extractors will place appropriate weight on environmental concerns and the public interest (and First Nation rights).”

First Nation / Aboriginal Participant

Qualified Professionals' Views on Administration of the Model and Accountability

This section presents QPs views on various issues associated the administration of the PRM, including conflicts of interests, accountability, the effectiveness of oversight, and whether the public's interest is being protected. Only QPs who responded to the QP survey (n = 1,802) were asked these questions.

STATEMENT:

The advice or direction provided by a QP may be influenced by or disregarded by the person who hires QPs.

STATEMENT:

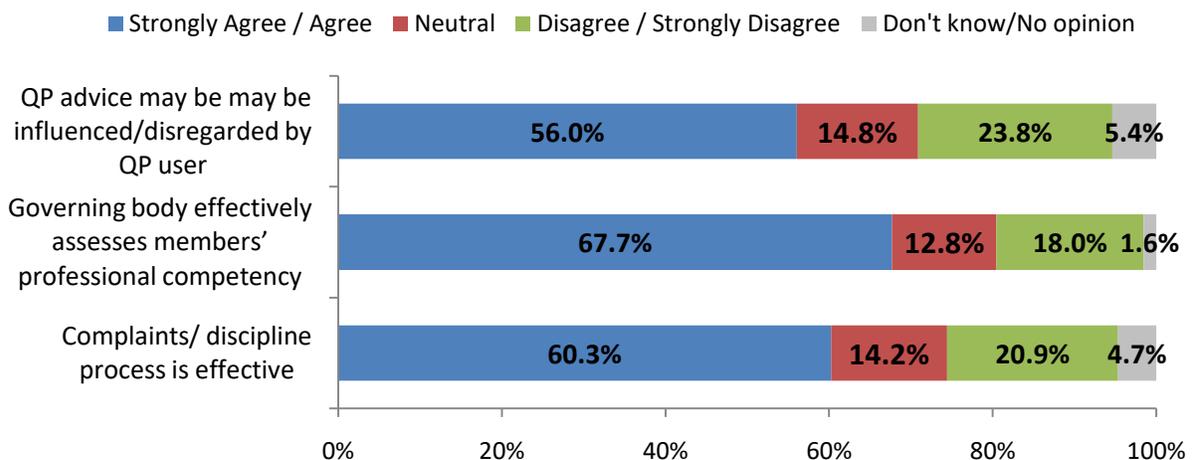
The governing body (i.e., professional association) is accountable by effectively assessing members' professional competency.

STATEMENT:

A complaints/ discipline process is effective in holding QPs accountable for their work.

Just over one-half of QPs (56%) believe their advice or the direction they provide is disregarded or influenced by the QP user who hires them. One-quarter (24%) of QPs disagreed with this premise. QPs have a better opinion of the mechanisms in the PRM that are meant to hold them accountable. Just over two-thirds (68%) feel their professional associations effectively assess QPs' professional competency, while 60% appear to be satisfied with the complaints and discipline process that are in place, believing them to be effective in holding QPs accountable for the services they provide. On both of these topics, approximately one-fifth of QPs disagreed (18% and 21%, respectively).

Exhibit 16: QPs' Views on Administration of the Model and Accountability



QUESTION:

Are you aware of situations in which decisions were delegated to QPs that shouldn't have been or where delegation should be considered?

The majority (60%) of the QP responses coded demonstrated a belief that decision-making relegated to QPs was appropriate and delegation was appropriately considered.

While many QP comments about delegation were short, for example "No", several QPs provided some elaboration on the topic.

"No, every QP has a scope of practice defined by competency and his/her associations bylaws. I believe this ensures that QPs do not practice in areas where they are not competent."

QP

"Not specifically. There may be opportunity to improve the level of diligence to ensure professionals have the appropriate experience within their field, but most often I have observed that there is adequate supervision and peer review within our profession."

QP

While few QPs comments about delegation were negative, those who differed on this issue cited concerns such as the QP being assigned to work having an inappropriate designation and conflicts of interest arising during QP decision-making.

"I am aware of some QPs doing work that they are not qualified to do.."

QP

"I have seen many significant decisions being made by QP's (employees) are large corporations where the best interest of the company comes first and the environmental considerations are evaluated on the basis of whether they can be done economically or not."

QP

QUESTION:

For the regulatory regime(s) that you are familiar with and/or operate in, are the right checks and balances in place to protect the public interest?

QPs are divided in their beliefs regarding the protection of public interest, with almost one-third (32%) of coded comments indicating that public interest is protected and over one-fifth (22%) of coded comments indicating public interest is not being protected.

For those QPs commenting on public interest, several expressed positive attitudes towards the checks and balances that are in place.

“Maintaining the public trust is mandatory to succeed, owners, advisors and regulators must protect the public interest to maintain public trust.”

QP

Negative attitudes expressed towards the appropriateness of the checks and balances that are in place with the current PRM and regulatory regimes often focused on government and professional association oversight.

“Both government and the professional associations have critical oversight responsibility under the professional reliance model. However, it would appear that there is insufficient staffing and funding to ensure transparent enforcement of regulatory requirements, as well as for the effectiveness monitoring and research function.”

QP

Suggested Changes to Maintain or Improve Public Trust

All General Public Survey and QP Survey respondents were asked what changes are needed to maintain or improve the public's trust in the PRM. Many suggestions were submitted.

QUESTION:

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

Three major themes regarding changes to the PRM were found when examining the random 35% sample of surveys that were coded to themes (n = 1,157). Of comments coded, many participants felt the government should be more involved and/or provide greater oversight of professional organizations and/or industry (37%). Further, there were recommendations to provide a greater emphasis on auditing and compliance procedures, as well as enforcement of regulations (16%). Additionally, there were calls for increased transparency to the public (15%).

Examples of comments illustrating the need for more government involvement include:

Updated Consultation Guidelines and direction to SDM [statutory decision-makers] which ensure the Positive duty to ensure continued exercise of Aboriginal rights (which are constitutionally protected) are met.

First Nation / Aboriginal Participant

As the Crown is ultimately charged with the responsibility of managing and protecting all natural resources, and as such the Crown cannot discharged this responsibility 100% to Professional Associations, the Crown needs to take an active role of random sampling/evaluation/review of professional work to ensure the highest level of management/protection is being maintained.

User of QPs

A much higher percentage of work done by industry professionals needs to be checked by government professionals to ensure integrity.

QP

The professionals must be employed by the government and be as free as possible from industry manipulation.

Citizen

Examples of comments illustrating a greater emphasis on auditing and compliance procedures, and enforcement of regulations include:

Greater oversight, increased reporting requirements (photographs, audits, etc.)

First Nation / Aboriginal Participant

Clearer direction in legislation / regulations so that when forest operations are conducted contrary to the legislation, they can be held accountable.

User of QPs

Use professionals that are independent of the companies or issues they are investigating. Hold companies accountable for their environmental disasters.

Citizen

Examples of comments illustrating the need for increased transparency to the public include:

There should be some greater openness and publicity so that concerned members of the public (including other QEPs) can scrutinize consultants' work... this would also provide the consultant QEPs with a much stronger argument to push back against client demands to "water down" work.

User of QPs

You need to listen to listen to the people who live within the province and who are affected by decisions made by these 'professionals'. For we the people these types of decisions are about us, our lives and our home province.

Citizen

Examples of comments on this issue provided by members of First Nations include:

Public Trust? How about starting with a new department of Sustainability. Fund it. Big time. And, have a council of elders on it...from all over BC, and make it equal in terms of women and men to serve as wisdom keepers of this new department.

First Nation / Aboriginal Participant

They should be highly qualified public servants, and have a level of liability for their decisions. Enforcement of these decisions needs to be supported to give them some support to prove the decisions that are made.

First Nation / Aboriginal Participant

Must improve public trust -transparency of complaints -specific competencies to practise aspects of the professional activity....

First Nation / Aboriginal Participant

Summary of Other Comments

All General Public Survey and QP Survey participants were provided with an opportunity to provide further comment on the professional reliance review. Many provided comments.

QUESTION:

Do you have any other observations or recommendations you would like to make about this review including further commentary on previously answered questions?

A randomly selected sample of 35% of all comments was thematically coded. Four themes seen for other questions were reiterated: greater government involvement and oversight (15%), worry that industry economic needs are prioritized over maintenance and care of the environment (15%), negative comments regarding the model (12%), and increased transparency to the public (12%).

Examples of comments demonstrating the need for more government involvement include:

Government needs a management plan for wildlife and habitat, with clear objectives.

User of QPs

Government appears to have taken delegation of QP's to a level where they can rely on this to reduce staff and costs. This was not the intent of using QP's and the Professional Reliance (PR) model. The PR model was set up to allow QP's a freedom to practice that inspired innovation and improvement in natural resource management.

QP

Qualified professionals reviewing projects should be employed by the government, not the companies promoting the project.

Citizen

Examples of comments demonstrating worry that industry economic needs are prioritized over maintenance and care of the environment include:

The clear result of the various "professional reliance" oriented decision-making regimes is inadequate environmental protection and a lack of openness and democratic accountability. There is abundant documentation of conflicts and harms caused by the inadequate checks and balances in BC's current regulatory environment.

Citizen

Over the last 30-40 years, there has been a systematic effort to undermine the will of the public concerning how resource extraction affects the quality of their environment. I would argue that the powers who have pushed for this have also systematically misinformed the public to the point where their

trust in government's ability to effectively oversee industries has been undermined.

Citizen

Examples of comments demonstrating respondent's negative comments regarding the PRM include:

Professional reliance overall is not working.

User of QPs

I strongly oppose the professional reliance model in all areas of practice. The levels of corruption and endangerment that we have already witnessed over many years in public safety speak volumes about the critical need for informed public oversight, periodic public review, and specific regulatory frameworks against which all practice is routinely and aggressively monitored.

User of QPs

You need to listen to listen to the people who live within the province and who are affected by decisions made by these 'professionals'. For we the people these types of decisions are about us, our lives and our home province.

Citizen

Professional reliance has been the equivalent of the wolves guarding the hen house as evidenced by the priorities of the last provincial gov't. Professional reliance needs to be as unbiased as possible and required to take a multi-generational timeline approach to enable sustainable resource extraction.

Citizen

Examples of comments demonstrating comments regarding increasing transparency to the public include:

Ensuring there is a database of previously collected knowledge (per the courts, regarding publicly available knowledge) to staff and decision-makers. Creating more opportunity for working with First Nations, (again, per the courts).

First Nation / Aboriginal Participant

Without a strong and transparent review process the public and First Nations will not have trust in the system and this will reflect on the government.

User of QPs

Put regulatory mechanisms in place for public input and open public meetings; especially when citizens are impacted.

Citizen

Regarding the outcomes of industry and other projects affecting natural resources, the BC government needs to ensure meaningful consultation with those impacted by projects, and strive for the full, prior and informed consent of local people.

Citizen

Citizens' Written Submissions

The provincial government sought public input as part of the Professional Reliance Review engagement process, asking citizens about the role of qualified professionals in the NRS. While many citizens responded to the General Public Survey, feedback included letters emailed to the engagement coordinator.

A randomly selected sample of 35% of the citizens' written submissions was thematically coded. The thematic analysis revealed three prevalent themes: greater government involvement in oversight of professional organizations (63%), economic needs of companies prioritized over environment (46%), and need for increased transparency to the public (44%)

Submissions regarding greater government involvement frequently suggested the government play a greater role in oversight of QPs and ensure companies using the services of QPs are not directly employing QPs in consultancy roles.

"Qualified professionals reviewing projects should be employed by the government, not the companies promoting the projects or consultants for sale."

Citizen

Those members of the public who felt the economic needs of companies often outstripped environmental concerns often pointed to issues of economic impact.

"Time and time again industry has proven its profits are its only true concern."

Citizen

"Please stop favoring timber, mining and fish farm corporations."

Citizen

Calls for increased transparency focused on access to information and inclusion in the decision-making process as it pertains to the natural resources sector.

"[A]llow the public to participate fully in decisions, [provide] easy access to information about environmental and health decisions, including access to reports prepared by industry-hired professionals."

Citizen

Formal Stakeholder Submissions

A variety of different types of stakeholders including individuals, associations, and other organizations were invited to submit a formal submission for the Professional Reliance Review. 119 stakeholder submissions were posted online. These submissions range in length from 1 to over 30 pages. See [Appendix H](#) for a list of stakeholders posting submissions and links to the submission documents.

Summary of Key Findings

Respondent Views on the Current Professional Reliance Model

While many survey participants (39%) did not feel the provincial government is appropriately using QPs to inform natural resource and environmental decision-making, an almost equal proportion (43%) believed their use is appropriate. Many members of First Nations (54%) and a majority of citizens (74%) did not feel government use of QPs is appropriate. QPs are divided in their feelings regarding government use of QPs with almost one-half (49%) indicating QP use by the government is appropriate and almost one-third (29%) believing it is not. Many comments from all participants called for increased professional association and government oversight.

Many respondents (55%) do not feel the current PRM provides an adequate balance between environmental protection and resource development. A sizeable proportion of users of QPs (62%), members of First Nations (71%), and citizens (88%) expressed similar sentiment. However, QPs were mixed in their beliefs, with over one-third (39%) who felt the balance was not adequate and an equal proportion (37%) who felt that the balance between environmental protection and resource development is adequate. Comments provided from all respondent groups point to issues of conflict of interest, as QPs are often directly hired by resource developers in the various natural resource industries.

One-half of all participants (50%) indicated that they do not feel the current PRM is transparent in how it uses QPs, with just over one-quarter (26%) indicating the PRM is transparent. While most respondent groups expressed similar feelings (users of QP (57%), members of First Nations (60%), and citizens (81%)), QPs were, again, divided in their opinion. Equal proportions of QPs (34%) felt the current PRM was, or was not, transparent in use of QPs. Many comments supplied suggest a need for increased transparency and inclusiveness, e.g. including public participation, in environmental protection and resource development decision making.

Survey respondents believe neither professional associations nor the provincial government provide an adequate level of oversight for QPs (46% and 59%, respectively). However, over one-third (35%) believed that professional associations provide the right level of oversight for QPs. With respect to professional association oversight, many respondents expressed disagreement (users of QPs (57%), members of First Nations (58%), and citizens (73%)), however one-quarter of members of First Nations (23%) and users of QPs (26%) thought the right level of oversight was provided by professional

associations. One-half of QPs (51%) felt professional association oversight was appropriate. Conversely, most felt the provincial government did not provide the right level of oversight of QPs. Many comments submitted indicated survey participants felt the provincial government is shirking responsibility through its use of the PRM.

Qualified Professional's Views on Administration of the Model and Accountability

QPs (56%) generally felt those using QP information disregard their advice or influence the information they provide. As well, most QPs (68%) thought governing bodies, such as professional associations, are effective at assessing QPs competency. Most QPs (60%) indicated that the complaints and discipline processes in place effectively hold QPs accountable for the work they do.

Commenting on the QP decision-making process, QPs do not feel there are issues with decision-making delegation. However, QPs' comments indicated that they were divided in their beliefs regarding the checks and balances that are in place to protect the public interest, with many indicating the public interest is protected and almost as many indicating the public interest is not protected.

Suggested Changes to Maintain or Improve Public Trust

Suggestions from all participants regarding maintenance or improvement of public trust highlight a need for provincial government and professional association oversight; a greater emphasis on auditing, compliance; and enforcement of regulations in the natural resources sector, and increased transparency in the PRM and use of QPs.

Other Observations and Recommendations

Consistent themes across all open-ended questions and citizen comments were seen across all respondent groups. These themes were: the need for more provincial government and professional association oversight (general oversight), prioritization of companies' economic needs at the expense of environmental protection (lack of environmental protection), and the need for increased transparency to the public (transparency).

Next Steps

Feedback collected from citizens, First Nations, stakeholders, QPs, and users of QPs will be considered (both individually and through this summary report) along with findings from a compliance audit of professional associations, an assessment of current regulatory regimes, and a review of best practices in other jurisdiction and sectors as part of a final report with recommendations that will be developed and released publicly by spring 2018.

Appendices

Appendix A: Past or Current Place of Employment by Respondent Group

	Aggregate	Aboriginal/First Nations	User of Qualified Professionals	Qualified Professionals	Citizens
Federal government	6.2%	14.3%	9.5%	5.1%	4.9%
Provincial government	37.7%	42.9%	56.9%	34.8%	22.9%
Local government	6.7%	17.1%	9.3%	6.0%	5.0%
Academic institution	9.8%	25.7%	11.1%	7.0%	14.7%
Private industry	35.4%	28.6%	33.3%	38.7%	29.5%
Consultant/Independent contractor	41.4%	22.9%	37.4%	53.1%	16.3%
Non-government organization (paid or volunteer)	9.2%	14.3%	14.6%	5.3%	13.0%
Qualified Professional Governing Body/Professional Association	3.5%	8.6%	5.0%	3.4%	2.1%
Industry Association	3.3%	11.4%	3.3%	3.6%	2.3%
Other	7.6%	20.0%	4.2%	4.3%	19.7%

Individual column %'s may sum to greater than 100% due to multiple responses
 Bolded text indicates response patterns differing from aggregate results.

Appendix B: Respondent Age by Respondent Group

	Aggregate	Aboriginal / First Nations	User of Qualified Professionals	Qualified Professionals	Citizens
Younger than 25 years	0.8%	5.0%	0.5%	0.4%	1.1%
25-34 years	12.3%	7.5%	12.4%	16.3%	10.4%
35-44 years	18.8%	20.0%	23.0%	21.2%	12.9%
45-54 years	21.7%	17.5%	26.7%	23.2%	15.6%
55-64 years	21.8%	25.0%	21.5%	19.5%	23.0%
65 years and older	20.9%	20.0%	13.2%	14.6%	32.5%
Prefer not to answer	3.8%	5.0%	2.7%	4.7%	4.4%

Bolded text indicates response patterns differing from aggregate results.

Appendix C: Provincial Region Where Respondents Lives by Respondent Group

	Aggregate	Aboriginal / First Nations	User of Qualified Professionals	Qualified Professionals	Citizens
Cariboo	5.3%	17.1%	6.2%	7.2%	2.8%
Kootenay	11.3%	12.2%	10.4%	10.0%	12.9%
Mainland / Southwest / Fraser Valley	23.4%	26.8%	21.4%	20.0%	27.0%
Nechako	5.7%	9.8%	8.2%	6.7%	2.3%
Northcoast	4.8%	4.9%	5.1%	6.1%	3.9%
Northeast	3.8%	4.9%	4.7%	4.3%	2.5%
Thompson / Okanagan	13.7%	7.3%	14.5%	16.3%	11.9%
Vancouver Island	30.0%	14.6%	27.6%	27.1%	34.7%
I live outside of B.C.	2.1%	2.4%	2.0%	2.4%	2.2%

Bolded text indicates response patterns differing from aggregate results.

Appendix D: How many years have you worked as a Qualified Professional practicing in the natural resources sector in BC?

Number of years	Percentage
Less than 1 year	5.3%
1-2 years	4.2%
3-5 years	9.3%
6-10 years	13.4%
11-15 years	13.3%
16-20 years	8.7%
More than 20 years	36.4%
Prefer not to answer	9.4%
Total (n) =1802	

Appendix E: Which of the following are you a member of/accredited by?

QP member of accredited by...	Percentage
Association of BC Forest Professionals	35.4%
Applied Science Technologists and Technicians of BC	9.5%
BC Institute of Agrologists	14.4%
College of Applied Biology	9.7%
Engineers and Geoscientists BC	34.3%
Other	4.8%
Prefer not to answer	3.5%

Individual column %'s may sum to greater than 100% due to multiple responses

Appendix F: Which region of the province do you provide QP services in?

Region of the province	Percentage
Mainland/Southwest	33.9%
Vancouver Island/Coast	32.4%
Thompson Okanagan	26.5%
Kootenay	19.8%
Northeast	21.9%
North Coast	17.1%
Cariboo	22.9%
Outside of BC	16.4%
Prefer not to answer	10.4%

Individual column %'s may sum to greater than 100% due to multiple responses

Appendix G: Level of Knowledge of Use of QPs

Group Affiliation	Level of Knowledge	Resource use	Protection of habitats and species	Discharges of waste to environment	Reclamation activities	Infrastructure
Aggregate	Very Knowledgeable	39.0%	26.6%	13.5%	10.5%	19.7%
	Knowledgeable	39.6%	44.3%	33.7%	29.4%	36.8%
Aboriginal/First Nations	Very Knowledgeable	29.3%	24.4%	14.6%	10.0%	20.0%
	Knowledgeable	58.5%	63.4%	34.1%	45.0%	42.5%
User of Qualified Professionals	Very Knowledgeable	51.5%	38.6%	19.6%	14.7%	23.5%
	Knowledgeable	38.6%	44.9%	34.6%	30.9%	39.8%
Qualified Professionals	Very Knowledgeable	44.9%	27.5%	13.7%	11.3%	23.5%
	Knowledgeable	37.6%	43.0%	32.4%	28.5%	38.6%
Citizens	Very Knowledgeable	11.5%	11.6%	6.6%	4.3%	6.3%
	Knowledgeable	44.6%	45.8%	36.0%	29.2%	29.0%

Appendix H: List of Groups and Organizations That Made Formal Submissions to be Posted Publicly

AltaGas Ltd.

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/AltaGas-Ltd.pdf>

Al Walters

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/02/Al-Walters.pdf>

Anthony Britneff

<http://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Anthony-Britneff-2.pdf>

Anthony Britneff – Development Framework

<https://engage.gov.bc.ca/app/uploads/sites/272/2017/12/Anthony-Britneff-Development-Framework.pdf>

Antiquus Archaeological Consultants Ltd

<http://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Antiquus-Archaeological-Consultants-Ltd..pdf>

Apex Property Owners Association

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Apex-Property-Owners-Association.pdf>

Association for Mineral Exploration

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Association-for-Mineral-Exploration.pdf>

Association of Professional Biology

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/02/APB-Association-of-Professional-Biology.pdf>

ASTTBC

<https://engage.gov.bc.ca/app/uploads/sites/272/2017/10/ASTTBC.pdf>

Association of BC Forest Professionals

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Association-of-BC-Forest-Professionals.pdf>

Association of BC Land Surveyors

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Association-of-BC-Land-Surveyors.pdf>

Association of the Chemical Profession of BC

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Association-of-the-Chemical-Profession-of-BC.pdf>

Association of Consulting Engineering Companies of BC

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Association-of-Consulting-Engineering-Companies-of-BC.pdf>

BC Coalition for Forestry Reform

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Coalition-for-Forestry-Reform.pdf>

BC Council of Forest Industries and the Coast Forest Products Association 1

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Council-of-Forest-Industries-and-the-Coast-Forest-Products-Association-1.pdf>

BC Council of Forest Industries and the Coast Forest Products Association 2

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Council-of-Forest-Industries-and-the-Coast-Forest-Products-Association-2.pdf>

BCIA PRR Release

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BCIA-PRR-Release.pdf>

BC Nature

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Nature.pdf>

BC Stone Sand and Gravel Association

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Stone-Sand-and-Gravel-Association.pdf>

BC Trappers Association

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Trappers-Association.pdf>

BC Tap Water Alliance

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/B.C.-Tap-Water-Alliance.pdf>

Bob Kopp

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/02/Bob-Kopp.pdf>

Bob McKechnie

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Bob-McKechnie.pdf>

BC Wildlife Federation

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BC-Wildlife-Federation.pdf>

Briony Penn

<http://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Briony-Penn.pdf>

Boundary Environmental Alliance

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Boundary-Environmental-Alliance.pdf>

British Columbia Cattlemen’s Association

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/British-Columbia-Cattlemen%E2%80%99s-Association.pdf>

British Columbia Society of Landscape Architects

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/British-Columbia-Society-of-Landscape-Architects.pdf>

Bryan Fraser

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Bryan-Fraser.pdf>

BCGEU

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BCGEU.pdf>

BCGEU Part 2

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/BCGEU-Part-2.pdf>

Business Council of British Columbia

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Business-Council-of-British-Columbia.pdf>

Canadian Cave Conservancy

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Canadian-Cave-Conservancy.pdf>

Cariboo Mountain Outfitters

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Cariboo-Mountain-Outfitters.pdf>

Circle M Outfitters

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Circle-M-Outfitters.pdf>

Clear Coast Consulting

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Clear-Coast-Consulting.pdf>

Coast Mountain Expeditions & Discovery Islands Lodge

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Coast-Mountain-Expeditions-Discovery-Islands-Lodge.pdf>

College of Applied Biology

<http://engage.gov.bc.ca/app/uploads/sites/272/2018/01/College-of-Applied-Biology.pdf>

Contaminated Sites Approved Professional Society

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Contaminated-Sites-Approved-Professional-Society.pdf>

Cowichan Lake and River Stewardship Society

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/01/Cowichan-Lake-and-River-Stewardship-Society.pdf>

Cedarland Forest Products

<https://engage.gov.bc.ca/app/uploads/sites/272/2017/12/Cedarland-Forest-Products.pdf>

David Bowering

<https://engage.gov.bc.ca/app/uploads/sites/272/2018/02/David-Bowering.pdf>

Douglas Channel Watch Society

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