

Federal Environmental Assessment Review Key Considerations



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Focus of Submission



- Thank you for the opportunity to present to you today.
- By way of background, I have a PhD in Environmental Design, have participated in Environmental Assessment processes, designed Social Impact Assessments and taught Environmental Assessment at the university level
- My presentation today will focus on particular questions related to Decision Making and Follow Up as well as Public Involvement that were identified in your workshop guide.

DECISION MAKING & FOLLOW UP



Q1 Types of Information Required



What's Wrong

- **Project Specific – considered in isolation**

How to Fix It

Develop a long term vision grounded in sustainability with a focus on social well being rather than economic goals that have the expectation of the social structure falling into place

Strategic plans, policies and programs need to be linked to the long term vision

Need robust cumulative effects guidelines and a regional approach

Q5 Management of Scientific Uncertainty



What's Wrong

- Basic assumption that project impacts are amenable to prediction and mitigation
- 'Based' on science – 'including' traditional knowledge (implicit bias)

How to Fix It

- Make use of precautionary principle & adaptive management strategies
- Build in flexibility to enable ongoing review and early identification of issues to make timely adjustments
- Involve public & indigenous peoples in determination of risks & adjustments
- Integrate science & traditional knowledge

Q5 Management of Scientific Uncertainty



What's Wrong

- Heavy reliance on technical positivist approach to inquiry/problem solving & decision making - oriented towards development & growth - compromises social and environmental values

How to Fix It

- Consider complexity science, critical theory, systems ecology and participatory democracy
- Consider thresholds and limits to growth and that not all impacts can be mitigated

PUBLIC INVOLVEMENT



Q1 Meaningful, Effective, Inclusive Involvement



What's Wrong

Participation is Reactive - ends are pre-determined

three pillars or three legged milking stool - social, economic, environment aspects – but the cow will still be milked

Restricted and short timeframes for public input

How to Fix It

Involvement needs to be ongoing and from the outset – Selection of Review Panel, Developing Terms of Reference, Public Involvement, Scoping through to Monitoring and Evaluation

Q1 Meaningful, Effective, Inclusive Involvement



What's Wrong

Public disadvantaged in relation to proponent's resources for expertise to represent their cause/agenda

Limited funding restricts access to expertise

Demands for investment of time and effort is overwhelming with insufficient resources to conduct thorough review

How to Fix It

Increase funding levels to enable thorough public review

Q1 Meaningful, Effective, Inclusive Involvement



What's Wrong

of projects increasing –
funding decreasing

funding not increased if
projects prolonged

How to Fix it

Provide sufficient funding
levels and additional funds
when review extended due
to additional information &
time requirements for
participation

Q1 Meaningful, Effective, Inclusive Involvement



What's Wrong

Gov't cut backs reduces objectivity as gov't increasingly relies on the proponent

Heavy reliance on written submissions – limits dialogue & debate

How to Fix It

Provide sufficient resources for public to engage experts to create a level playing field and promote a balanced review

Make extensive use of public review groups to enable dialogue and debate

Q2 – Extent of Public Views Considered



What's Wrong

Short turn around times

Difficult to keep up with changes to projects

Input not equally considered interests of interveners often ignored

Once approved, public no longer involved

How to Fix It

Ongoing involvement would reduce urgency to respond within restrictive timeframes

Provide an appeal process for public

Involve public in oversight

Q2 Extent of Public Views Considered

What's Wrong

Sense of urgency increases
time pressures

Scope of involvement is
restricted – bounded frames
of reference – what can be
considered and what not

How to Fix It

Ensure reasonable time
frames for public review

Involve public in developing
guidelines for public
involvement

Enable flexibility to include
issues/concerns outside
scope if/when they arise

Q4 Information Required



What's Wrong

Ends are pre-determined

“the cow will still be milked”

How to Fix It

- Provide information regarding the alternatives considered included consideration of the ‘null’ alternative



Thank-you!