

Summary Statement:

Baseline wildlife surveys of coastal ecosystems are an essential initial step to avoid “data gaps” in two areas of the Environmental Assessment Process: 1) when identifying “Valued Ecosystem Components (VECs)” and 2) when proponents address the impact of operations on VECs at proposed sites.

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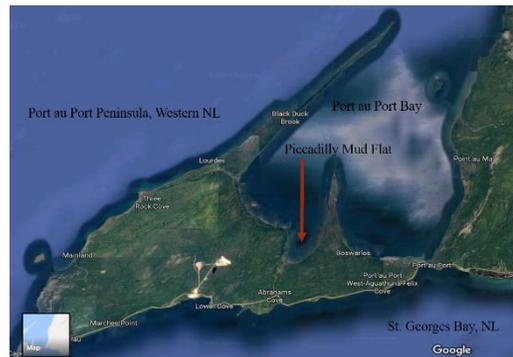
The Bay St. George Bird Society is a young and growing, not-for-profit community group dedicated to preserving avian habitat by promoting birdlife in the Stephenville-Bay St. George and Port-au-Port area. We do this by leading field trips at coastal sites and established walking trails; hosting guest speakers; participating in Breeding Bird Surveys, Christmas Bird Counts and local bird festivals and documenting observations on ebird Canada. We are also working to establish a receiving tower for the Motus Wildlife Tracking System in our area. Look for us on Face Book in the New Year.

Environmental Assessment Process

There are 2 concerns regarding the overall Environmental Assessment Process that need to be reviewed: 1) the issue of “data gaps” and 2) the assignment of environmental responsibility as a result of them.

Working Example

A good example may be the Soft Shell Clam Farm proposed for the Piccadilly Mud Flat, one of three sites situated in western NL (Google Map 1). As part of the Environmental Assessment Process, the responsible provincial department prepared Environmental Impact Statement Guidelines identifying “Valued Ecosystem Components (VECs)” (based on existing wildlife data) for the proponent to address. Banded Killifish (*Fundulus diaphanus*) had been identified as a VEC for two sites but not for Piccadilly. Yet,



confirmation of its presence here is now under review due to a photo taken by chance during a recent field trip to the Piccadilly site. An *unidentified* VEC (in Piccadilly for example), raises concern over an absence of wildlife data in general not only in the identification of VECs but for the proper assessment of ecological impacts at proposed sites. An absence of wildlife data also suggests an absence of scientific information, making it a challenge for proponents to fully address ecological impacts of their proposed operations, and for reviewers to critique them.

Recommendation

At the time the project is registered, trigger a complete and comprehensive literature review of known ecological impacts from proposed operations at similar sites. Make data collection and scientific study mandatory at proposed sites in which ecological information is lacking at the government level and at the level of the proponent. Prohibit the use of “no data” in the Environmental Assessment Process. Disallow proponents to utilize the proposed ecosystem in its entirety; assign a portion to the project, with the remainder as a control for scientific study.