



Via email: ec.ministre.minister.ec@canada.ca
(Original to follow by mail)

The Honourable Catherine McKenna
Minister of Environment and Climate Change
Centre Block, Suite 433C
House of Commons
Ottawa ON K1A 0A6

RE: Expert Panel Report, Review of the Canadian Environmental Assessment Process

Dear Minister:

The College of Applied Biology is pleased to submit summary comments on the Expert Panel's recent report and review of the *Canadian Environmental Assessment Act* and process. We commend the Expert Panel for summarizing the many submissions of stakeholders who took part in the cross-Canada review process, and for the recommendations made based on those perspectives.

We understand the challenges the Panel faced in trying to find effective solutions given substantial differences of views among intervenors on a number of issues. The College acknowledges and supports the federal government's desire to identify ways to bolster public confidence, improve transparency, employ adaptive management, and ensure certainty in the review process for new projects.

We are particularly encouraged by the Panel's recommendation that to "restore public trust and confidence in assessment processes" there should be the following four (4) areas of focus:

1. Striving to remove any perceived notion of bias on the part of responsible authorities;
2. Maximizing the benefits of a planning-focused impact assessment (IA);
3. Instilling co-operation and consensus as a governance philosophy; and
4. Ensuring that IA delivers transparent, evidence-based decisions.

What we feel is missing from the Report are recommendations on how to ensure science is unbiased, serves the public interest, and earns the public trust.

As stated in our letter of December 6, 2016 to the Panel, the College reaffirms its position that for the government to meet the objectives stated above, *the EA process needs qualified and accountable professionals, whose unbiased recommendations must be based on scientific facts. The addition of accountability to the EA process, whether in data collection; development of reports, recommendations, or statements; or for decision makers, will provide the public, government, and industry with a level of trust that is currently lacking.*

The College of Applied Biology, as with all regulated professional organizations, has as its primary mandate to hold members accountable for their conduct and practice and to safeguard the public interest. If your government is to be successful in delivering an improved process that will “restore public trust in EA; to introduce new, fair processes; and to get resources to market”, it is critical to include registered, accountable professionals at every step in the process.

We recognize that, as of now, a regulator of professional biologists does not exist in every province as it does for other professionals working in natural resource management. Professional biology is a new, emerging profession with legislation in two provinces (BC and Alberta) and with voluntary registration in Quebec. All of these professional bodies also register members from other provinces who wish to distinguish themselves by showing that they have met education standards and uphold high standards of practice, including the requirement to provide unbiased science-based advice. A recent national survey by these three professional bodies indicates there is a growing interest from biologists across Canada in their skill and training being recognized with a professional designation.

Given the significance of the environment in Canada, and the large potential influence of recommendations, decisions, and data collection by biologists in IAs as well as other types of development, we anticipate that the recognition of biology as an important scientific profession will only continue to increase.

To meet objectives set out in the Panel report to support the development of unbiased scientific recommendations by accountable biology professionals that meets public expectations, we recommend that, in provinces with a professional regulatory body, the federal government require that biologists working on Impact Assessments be members of the regulated profession.

We are very encouraged by the goals set out by your government and the steps it is taking to improving the environmental assessment process. We welcome further dialogue with you and your colleagues on this important initiative and request a meeting with you at your earliest convenience.

Please do not hesitate to contact me or Christine Houghton, the College’s Executive Director.

Sincerely yours,



Dr. Vanessa Craig, RPBio
President
College of Applied Biology