

BC Nature Submission – March 23, 2026

Re: Discussion Paper – A Preliminary Framework for Expedited Environmental Assessment

BC Nature appreciates the opportunity to provide feedback on the *Discussion Paper: A Preliminary Framework for Expedited Environmental Assessment*.

BC Nature represents a network of 64 naturalist clubs and more than 7,000 members across British Columbia. Our members include naturalists, scientists, volunteers, and conservation advocates dedicated to protecting biodiversity and promoting responsible stewardship of the province's ecosystems.

BC Nature recognizes the importance of efficient regulatory processes for infrastructure and development projects. At the same time, environmental assessments play a critical role in ensuring that development proceeds responsibly and that ecological systems, communities, and Indigenous rights are protected.

From a conservation perspective, BC Nature believes that any expedited environmental assessment framework should be guided by four core principles:

- Scientific rigor must be maintained
- Public participation must remain meaningful
- Indigenous rights and knowledge must be respected
- Biodiversity and cumulative effects must remain central

The following comments respond to key sections of the discussion paper.

1. Purpose of the Document

Discussion Paper Summary

The discussion paper proposes the creation of a **20-month expedited environmental assessment process** intended to streamline reviews for certain designated infrastructure projects while maintaining environmental protection standards.

BC Nature Perspective

BC Nature understands the Province's goal of improving efficiency in project approvals. However, environmental assessments exist to ensure that large-scale projects do not cause unacceptable ecological harm.

Expedited timelines must not compromise the ability of the environmental assessment process to fully evaluate environmental impacts, identify emerging risks, and incorporate independent scientific review.

Environmental assessments should remain robust investigative processes capable of identifying impacts that may not be apparent during early project planning.

Recommendations

BC Nature recommends that the expedited EA framework:

- Maintain strong scientific review and independent technical assessment.
- Ensure expedited timelines do not limit the evaluation of environmental risks.

- Clearly identify project types that remain unsuitable for expedited review due to ecological sensitivity.

2. Project Designation Process

Discussion Paper Summary

The Infrastructure Projects Act establishes a project designation process through which certain projects may be considered for expedited environmental assessment if they demonstrate an advanced state of readiness.

BC Nature Perspective

Determining whether a project is suitable for expedited review is a critical decision point. If the designation process is not sufficiently rigorous, projects with significant environmental risks could proceed through a shortened review process.

BC Nature believes that strong and transparent eligibility criteria are essential to ensure that expedited assessments are used only where environmental risks are well understood and manageable.

Recommendations

BC Nature recommends that the designation process:

- Establish clear eligibility criteria for expedited assessments.
- Exclude projects affecting critical wildlife habitat, species at risk, or intact ecosystems.
- Require independent technical review of baseline environmental data prior to designation.

3. Evaluation Criteria for Expedited EA Suitability

Discussion Paper Summary

The proposed criteria for determining suitability for expedited EA include:

- advanced project description
- one year of seasonal baseline data
- engagement with First Nations
- engagement with local communities
- predictable environmental impacts.

BC Nature Perspective

While readiness criteria are important, BC Nature notes that one year of seasonal baseline data may be insufficient for ecological assessment, particularly in sensitive ecosystems.

Wildlife populations, migratory species patterns, hydrological conditions, and climate-related ecological dynamics often vary significantly between years.

Short baseline periods may therefore fail to capture important environmental patterns.

Recommendations

BC Nature recommends:

- Multi-year ecological baseline data collection for projects affecting wildlife or sensitive ecosystems.
- Independent verification of ecological data used in assessments.
- Explicit consideration of cumulative effects when determining whether projects qualify for expedited review.

4. First Nations Participation and Consensus-Seeking

Discussion Paper Summary

The expedited EA framework emphasizes collaboration with participating Indigenous nations and seeks consensus at key stages of the assessment process.

BC Nature Perspective

BC Nature supports strong Indigenous participation in environmental assessments and recognizes the importance of Indigenous knowledge and stewardship practices. Meaningful participation requires adequate time, resources, and access to technical expertise. Accelerated timelines must not limit the ability of Indigenous nations to review information, participate in assessments, or express concerns.

Respecting Indigenous rights and knowledge is essential to achieving both sound environmental decisions and reconciliation.

BC Nature also notes that governance structures within and among Indigenous nations may be complex. In some cases, differing perspectives between elected leadership and hereditary governance systems may arise. Where consensus is not achieved, this has the potential to introduce significant delays into the environmental assessment process.

The expedited framework should recognize that these situations may occur, and that meaningful consultation and consent-building cannot be rushed. Failure to account for this complexity risks undermining both reconciliation efforts and the feasibility of expedited timelines.

Recommendations

BC Nature recommends that the expedited EA framework:

- Ensure adequate capacity funding for Indigenous participation.
- Integrate Indigenous knowledge alongside technical assessments.
- Maintain clear opportunities for Indigenous nations to express consent or non-consent.

5. Public Engagement and Comment Periods

Discussion Paper Summary

The proposed expedited EA framework includes a 14-day public comment period during process planning and a 30-day comment period during application review.

BC Nature Perspective

Public participation is a cornerstone of environmental assessment and helps ensure that local knowledge, community concerns, and ecological observations inform project decisions.

BC Nature's network of 64 naturalist organizations and more than 7,000 members regularly contributes valuable citizen science observations and ecological insights that can strengthen environmental decision-making.

Short comment periods may limit meaningful participation by local communities, conservation groups, and independent experts.

BC Nature also emphasizes that meaningful public engagement must occur early in the assessment process, when project design and outcomes can still be influenced. Engagement should provide genuine opportunities for substantive input from conservation organizations, local communities, and independent experts, rather than serving primarily as a mechanism for information sharing. Without early and meaningful engagement, there is a risk that public participation becomes procedural rather than impactful.

Recommendations

BC Nature recommends:

- Extending public comment periods to allow meaningful review.
- Providing clear summaries showing how public feedback influenced EA conclusions.
- Ensuring broad public notification of comment opportunities.
- Ensure public engagement occurs early enough in the process to meaningfully influence project design and assessment outcomes.

6. Application Review and Environmental Effects Assessment

Discussion Paper Summary

The expedited EA framework proposes combining the application review and effects assessment phases into a single consolidated stage to accelerate the review process.

BC Nature Perspective

BC Nature emphasizes that the environmental effects assessment is the core of the environmental assessment process. It is the primary mechanism through which potential impacts to biodiversity, ecosystems, and communities are identified, evaluated, and understood.

While consolidating review phases may improve administrative efficiency, it must not diminish the prominence, transparency, or rigor of the effects assessment.

To support informed decision-making, environmental effects should be clearly identified and assessed individually. Mitigation measures for each effect should be explicitly described, along with an assessment of whether residual effects will remain after mitigation is applied.

Environmental assessments must continue to evaluate impacts on biodiversity, ecosystems, and cumulative environmental conditions, ensuring that broader ecological risks are fully understood.

Recommendations

BC Nature recommends that the expedited EA process:

- Maintain rigorous scientific review of environmental impacts.
- Require explicit cumulative effects assessments.
- Ensure biodiversity impacts remain central to decision-making.

- Clearly identify and assess individual environmental effects, including pathways and significance.
- Transparently document mitigation measures for each effect and identify any residual effects that remain after mitigation.

Conclusion

BC Nature supports efforts to improve the efficiency and predictability of British Columbia's environmental assessment processes. However, regulatory efficiency must not come at the expense of environmental integrity.

By maintaining scientific rigor, ensuring meaningful public participation, respecting Indigenous rights and knowledge, and prioritizing biodiversity and cumulative effects, the Province can develop an environmental assessment framework that both supports responsible development and protects the ecosystems upon which British Columbians depend.

An expedited process that limits meaningful participation or weakens environmental analysis risks undermining public trust and the long-term sustainability of project outcomes.

BC Nature looks forward to continued engagement as the expedited environmental assessment framework is refined.