

January 30, 2024

Via Email: biodiversity.ecosystemhealth@gov.bc.ca

Honourable Nathan Cullen
Minister of Water, Land and Resource Stewardship
PO Box 9012 Stn Prov Govt
Victoria BC V8W 9L6

RE: Draft B.C. Biodiversity and Ecosystem Health Framework

Dear Minister,

The Business Council of British Columbia, the Mining Association of British Columbia, the Association for Mineral Exploration B.C., the Council of Forest Industries, the Canadian Association of Petroleum Producers, and the Explorers and Producers Association of Canada (the Associations) appreciate the opportunity to provide our input on the Draft B.C. Biodiversity and Ecosystem Health Framework (the Draft Framework).

Our organizations are committed to building economic prosperity for the benefit of all citizens of British Columbia. Our members throughout the province bring investment resulting in well-paying, family-supporting jobs in urban and rural communities. We understand the provincial landscape, natural endowment of species, and complex and varied ecosystems are all part of the vast potential of British Columbia. A healthy economy depends on a healthy natural environment and B.C. citizens, including those in the business community, care deeply about both. Sustaining the long-term capacity of both social and natural systems is important for British Columbia. This requires cooperation, prioritization, and recognition of multiple objectives when determining trade-offs in public interest decision making. It is within this frame that we offer the following comments:

- 1) In general terms, we support the desired outcomes articulated on page 5 and 6 of the Draft Framework focusing on healthy ecosystems, advancing reconciliation, effective stewardship and resilient communities and economies.
- 2) The principles on page 6 of the Draft Framework are reasonable, conceptually, but they lack definition, and it is unclear how they will ultimately support public interest decision making.
- 3) The three “Action Pillars” — taking a whole-of-government view, fostering, and supporting a broader whole-of-society approach, and adopting an open and transparent process — are useful guideposts but lack detail. We are concerned about how potential actions add to already complex and overlapping regulatory processes within natural resource sector ministries including and especially statutory decision making. Permitting and authorization timeframes are already a significant challenge in resource industries. Exports to global markets are highly dependent on international investment to develop new projects in mining, natural gas, and forestry operations which, in turn, sustain rural and urban communities throughout the province. As such, the certainty of process and process outcomes are critical for B.C.’s resource industries and any final framework must complement other efforts within government to improve the investment climate and permitting timelines for industries operating on the provincial land base.

- 4) We are very concerned with the fundamental premise of the Draft Framework which proposes a shift from government decision making that considers trade-offs to one solely focused on “policies, decisions, and actions [that] would first consider ecosystems” (page 4). This runs counter to ecosystem-based management which has multiple objectives and multiple pathways to achieving balanced outcomes in the public interest. Win-win outcomes do not result from having a “no compromise” decision making framework or objective, as appears to be the intended direction of the Draft Framework.
- 5) We are concerned with the focus of the Draft Framework on developing new regulatory mechanisms (i.e., proposed new legislation) as the primary approach to problem solving. Creating more statutory authorities and decision making in a new Office of Biodiversity and Ecosystem Health, adds to the cumulative cost of doing business in B.C. and could further undermine the relative competitiveness of B.C.’s trade exposed resource industries. This approach is also inconsistent with your mandate letter direction to “lead cross-government work to improve timing and transparency of permitting processes to support sustainable economic development, housing and infrastructure while maintaining high levels of environmental protection.” Adding more regulatory requirements and processes runs counter to this goal. While there are potential efficiencies from coordination across agencies, it is critical your Ministry works closely with industry to ensure the regulatory system (in general and specific to the Draft Framework) does not impede investment which is already a significant challenge. We recommend a sharp focus on better, rather than more, regulation and rationalizing what exists instead of adding to the cumulative burden. As such, we do not support a new Statutory Decision Maker as seems to be contemplated.
- 6) Our associations have long supported reconciliation efforts with Indigenous people of British Columbia. We proactively seek opportunities to work with various Indigenous communities and companies throughout the province on an ongoing basis. Resource development (e.g., mining, energy, forestry, etc.) has unique and powerful opportunities to advance economic reconciliation given our substantial natural resource endowment and the location of Indigenous communities throughout the province. The Draft Framework should use the Declaration of the Rights of Indigenous People Act as an interpretive guide to help evolve ecosystem management and reconciliation, rather than as the sole foundation for the Draft Framework and decision making. This is an important adjustment to the starting point for further engagement on the Draft Framework
- 7) We share concerns about some language use and the overall tone of the Draft Framework. Readers could wrongly conclude B.C. is on the verge of a biodiversity collapse. The document also seems biased against and unbalanced in its sentiments towards industry. The government’s own data on the amount of land currently under various forms of conservation protection shows that B.C. is a conservation leader within Canada. This should be acknowledged as should the outsized contribution B.C.’s natural resource export industries make to B.C.’s economic well-being and that unparalleled leadership of B.C. industries has made this possible. This must not be overlooked. We recommend clear and accurate representation of the of the positive state of ecosystem health along with the foundational importance of B.C.’s natural resource industries to the economic well-being of British Columbians.

We look forward to further engagement on the Draft Framework, along with an opportunity for our respective associations and their members to engage with you and your officials as the Draft Framework evolves, including implementation which we understand is already in process.

Yours sincerely,




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& Indigenous Relations
Business Council of British Columbia




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Mike Fulsom
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cc: Honourable David Eby, Premier of British Columbia
Honourable George Heyman, Minister of Environment and Climate Change Strategy (ENV)
Honourable Murray Rankin, Minister of Indigenous Relations and Reconciliation (IRR)
Honourable Josie Osborne, Minister of Energy, Mines and Low Carbon Innovation (EMLI)
Shannon Salter, Deputy Minister to the Premier
Doug Caul, Deputy Minister, Office of the Premier
Kevin Jardine, Deputy Minister, Ministry of Environment and Climate Change Strategy (ENV)
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