
From: Carter, David <David.Carter@dfo-mpo.gc.ca>
Sent: July 30, 2022 12:34 AM
To: Myles,Debra (IAAC/AEIC)
Cc: Richardson, Tessa
Subject: RE: Request for a regional assessment in the Salish Sea

Hi Debra, DFO has the following suggestion for your consideration.

Issue

Cumulative effects to ecosystems and to the rights of Indigenous peoples is a significant concern raised during impact assessments and regulatory reviews of projects in the Salish Sea. During impact assessments and regulatory reviews, conditions can be placed on the project proponent in order to lessen the contribution of the project to cumulative effects. However, the broader issue of addressing existing cumulative effects and residual project contributions (following mitigation) to cumulative effects falls to federal and provincial governments. In response to concerns previously identified regarding cumulative effects in the Salish Sea, the Government of Canada is advancing knowledge to help assess and manage these cumulative effects. However, no overarching cumulative effects management strategy exists to bring the work of these programs together to share information, and to coordinate and prioritize goals and actions. If such a strategy existed, it could be used to inform actions that both proponents and Government could take to respond to cumulative effects issues during environmental assessments and regulatory reviews.

Details regarding relevant DFO programs have been shared with the Agency in the June 15, 2022 DFO updates to the Draft RBT2 Whole of Government Response to the Review Panel recommendations, and include:

- Whales Initiative
- Coastal Environmental Baseline Program
- Salish Sea Initiative
- The Southern BC Marine Spatial Planning process
- Advancing knowledge in support of managing cumulative effects in the Salish Sea (TMX recommendation 1)
- Assessing annual reporting on existing programs and initiatives related to cumulative effects in the Salish Sea (TMX recommendation 2)

Recommendation

DFO recommends that IAAC consider the following needs when determining whether or not to conduct a regional assessment in the Salish Sea:

1. The need for a venue to assess cumulative effects of human development on the rights of Indigenous peoples, and to recommend actions to address these effects.
e.g. from a rights perspective, assess 1. how various stressors to the ecosystems are affecting rights of indigenous peoples, and 2. How human activities are directly affecting rights of Indigenous peoples.
2. The need for a cumulative effects management strategy in the Salish Sea in order to share information and coordinate and prioritize goals and actions among the federal, provincial, and Indigenous governments, and NGOs.

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