RESPONSE TO WORKING GROUP AND PUBLIC COMMENTS ON THE SITE C CLEAN ENERGY PROJECT ENVIRONMENTAL IMPACT STATEMENT

Technical Memo

THE WORLD COMMISSION ON DAMS AND THE INTERNATIONAL HYDRO POWER ASSOCIATION'S SUSTAINABILITY PROTOCOL

MAY 8, 2013

Subject: The Workd Commission on Dams and the International Hydro Power Association's Sustainablility Protocol

Purpose

The purpose of the following Technical Memo is to address questions raised during the comment period about evaluating the Project based on the following:

1. *Dams and Development: A New Framework for Decision-Making. The Report of the World Commission on Dams,* November 2000.
2. The International Hydro Power Association's Sustainability Protocol

The Report of the World Commission on Dams (WCD) and the International Hydropower Association (IHA) Sustainability Assessment Protocol provide general guidance and evaluation tools for hydroelectric projects. Many of these guidelines are already captured within the environmental assessment process and legislative requirements in Canada, including the environmental assessment for the Project, which is being conducted in accordance with the B.C./Canada Agreement.

The WCD report provides general guidance for hydroelectric development that is particularly appropriate for a developing economy that does not have a regulatory framework in place for evaluating projects. The IHA clearly states that its Sustainability Protocol is not a replacement for national or local regulatory requirements.

The environmental assessment process for Site C is being conducted in a thorough and independent manner and in accordance with the terms and conditions set out in the B.C./Canada "Agreement to Conduct a Cooperative Environmental Assessment, including the Establishment of a Joint Review Panel of the Site C Clean Energy Project" (February 8, 2012). In addition to the comment periods for the EIS Guidelines and for the EIS, a public hearing will be conducted by an independent Joint Review Panel. The process provides opportunities for timely and meaningful participation by the public, Aboriginal groups, all levels of government, and other interested stakeholders and will result in an environmental assessment that meets the requirements and statutory objectives of the *Canadian Environmental Assessment Act 2012* and the British Columbia *Environmental Assessment Act*.

The criteria for evaluating the Project were set out in the EIS Guidelines. During the preparation of the EIS Guidelines, members of the Working Group, including Aboriginal groups, government agencies, and members of the public, provided comments and information requests, to which BC Hydro provided detailed responses. The final EIS Guidelines were issued to BC Hydro by the federal Minister of Environment and the Executive Director of the EAO on September 7, 2012. The Environment Impact Statement submitted by BC Hydro must meet the requirements described in the EIS Guidelines.

Sections 8 and 10 of the EIS describe the assessment process and effects assessment methodology, respectively, in accordance with the EIS Guidelines.

World Commission on Dams

The WCD was established in February 1998 in response to a 1997 workshop supported by the World Bank and the International Union for Conservation of Nature (IUCN). The workshop was attended by

39 people from governments, the private sector, international financial institutions, NGOs and individuals.

The WCD began its work in May 1998. Its members included academics, industry representatives and environmentalists. The final report of the WCD*, Dams and Development: A New Framework for Decision-Making*, was released in November 2000.

The report proposed a new framework for decision-making based on seven strategic priorities, including: gaining public acceptance, comprehensive options assessment, addressing existing dams, sustaining rivers and livelihoods, recognizing entitlements and sharing benefits, ensuring compliance, and sharing rivers for peace, development and security.

The WCD report stated that it was not intended to be a blueprint, but rather a starting point for discussions, debates, internal reviews and reassessments. The WCD report was international in scope and offered general guidance that may be more appropriate for a developing economy that does not have a sophisticated regulatory framework in place for evaluating large-scale projects as would be the case in Canada.

International Hydropower Association – Sustainability Assessment Protocol

According to the IHA, the Hydropower Sustainability Assessment Protocol is an enhanced sustainability assessment tool used to measure and guide performance in the hydropower sector.[1]

The Protocol assesses the four main stages of hydropower development: Early Stage, Preparation, Implementation and Operation. Assessments rely on objective evidence to create a sustainability profile against 20 topics depending on the relevant stage, covering all aspects of sustainability.

To date, seven assessments have been undertaken with the 2010 version of the Protocol, one of which is publicly available.

The IHA states that its Sustainability Assessment Protocol is not a replacement for national or local regulatory requirements, and its tool does not offer a “pass/fail” or a “certified stamp of approval” to any project.

Related Comments / Information Requests:

This technical memo provides information related to the following Information Requests:

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[1] http://www.hydrosustainability.org/Protocol.aspx.