

Recommendations for an Improved Professional Reliance Model in the BC Natural Resource Ministries

Prepared by the PEA-side of the Professional Reliance Task Force

Foreword

At the time of writing, the Province is confronted with two urgent issues. One is the emergency response of the large-scale flooding and landslide damage that has affected much of the South Coast and Interior region. The other issue is related to the need to develop, jointly with Blueberry River First Nation's (BRFN) and other Treaty 8 Nations, a robust process to account for cumulative impacts on Treaty 8 Rights in permitting decisions, in light of the BC Supreme Court decision in June 2021 (Yahey vs BC, 2021 BCSC 1287).

Over the last ten years, British Columbia has been significantly affected by more frequent and extensive wildfires, drought, flooding and landslides (OAG, 2018; ENV, 2019). While the natural disasters that have impacted British Columbia were caused by extreme weather events related to climate change, the Province's current approach to natural resource management has exacerbated the extent of the damage and overall economic loss. The inability of the Province to adequately account for cumulative impacts in natural resource-related decisions has also led to the BC Supreme Court decision regarding the BRFN claim.

One of the main reasons the BC Government has not met its mandate to protect and manage its natural resources effectively is the adoption of an inadequate professional reliance model in the BC Natural Resource Ministries. This is consistent with what the Province's Auditor General indicated in 2018: *"...the Government may not be able to manage flood risks, given that roles and responsibilities are spread across many agencies and levels of government, and these organizations may not have adequate staffing or technical capacity."* (OAG, 2018).

The Professional Reliance Task Force requests that the Province consider the recommendations offered in this document. Moving toward an effective professional reliance model in the BC Natural Resource Ministries is essential to help the Province reverse the ongoing degradation of the natural environment and resources of British Columbia.

The PEA-side of the Professional Reliance Task Force,

British Columbia, 3 December 2021.

Executive Summary

This document provides recommendations to improve the Professional Reliance model currently adopted in the Province’s Natural Resource Ministries so that the Ministries can fulfill their basic mandate to manage natural resources effectively and ensure the protection of the natural environment. These recommendations are the result of the work conducted by the Professional Reliance Task Force, a joint PEA-Employer group that was established as part of the 2019 Union Settlement Agreement. While the intent of the joint Task Force was to prepare recommendations endorsed by both the PEA-side and Employer-side of the Task Force, as agreed to during the last round of bargaining with the Employer, the Employer-side representatives moved to different roles and regrettably left the Task Force in early 2020, with no new representatives replacing them. As the mandate of the Task Force is due to expire on December 31, 2021, the PEA-side of the Task Force has prepared recommendations unilaterally.

The recommendations summarized in Table 1 pertain to the four key areas identified in the Task Force Terms of Reference.

Table 1 – Summary of the Professional Reliance Task Force Recommendations

Area	Recommendation
Right to Title and Practice	#1. Conduct a thorough review of the duties and responsibilities of SDMs ¹
	#2. Conduct a thorough review of STO ² and LSO ³ positions
Ministry Staffing Levels	#3. Conduct a professional staffing analysis
	#4. Develop competitive recruitment and retention strategies
	#5. Maximize the use of professional expertise
Availability of Resource Information	#6. Increase the accessibility of the natural resource information collected by the Province
	#7. Increase the accessibility to Government ‘in-house’ natural resource assessments and studies
	#8. Increase the requirements for data upload from permittees
	#9. Enter into data sharing agreements with Indigenous Nations and other levels of government
	#10. Increase outreach initiatives
Government as a Knowledgeable Owner	#11. Use Government professional expertise to develop resource management plans
	#12. Increase field data collection efforts and funding
	#13. Increase professional capacity of Compliance and Enforcement staff

¹ Statutory Decision Makers

² Science and Technical Officers

³ Licensed Science Officers

In the area of Right to Title and Practice, it is recommended that the duties and responsibilities of both PEA and non-PEA professional staff should be reviewed, to ensure that professional registration is required when staff are required to practice in areas where right to title and practice apply. If professional registration is required to fulfill the position's duties, Government should reimburse the professional registration fees and support the professional development requirements of the licensing professional body for professional staff, regardless of whether this staff are PEA members or not.

The recommendations related to Ministry staff levels speak to the need for an increased professional work force in Government but also highlight that the existing professional staff's time could be better employed to maximize the use of their professional expertise and experience. Recruitment and retention strategies are also suggested to improve the Government's ability to attract high-quality professionals.

Regarding the increase of resource information availability, the recommendations include improvement of the existing publicly accessible data platforms, the establishment of data sharing agreements, and outreach activities to educate the public on natural resource data access.

To improve the role of Government as a knowledgeable owner, more investment is recommended into the development and expansion of environmental monitoring programs, the development of robust integrated natural resource management plans and an increased professional capacity in the compliance and enforcement programs.

1. Introduction

1.1 Purpose and structure

This document outlines the recommendations offered by the PEA-side Professional Reliance Task Force to improve the current Professional Reliance model in the Natural Resource Ministries of the BC Government.

This document is organized as follows:

Section 2 describes the concept of Professional Reliance, according to the interpretation included in the Professional Reliance Review (Haddock, 2018) and in the *Professional Governance Act* and highlights the problematic aspects of the current Professional Reliance model employed in the BC Natural Resource Ministries.

Section 3 to 6 provide definitions and recommendations related to the following aspects of Professional Reliance, which are considered in the Terms of Reference of the Professional Reliance Task Force:

- Right to Title and Practice
- Ministry Staffing Levels
- Availability of Resource Information
- Government as a Knowledgeable Owner

1.2 Background

In the early 2000s, the Province streamlined regulation of the natural resource sector and reduced its professional staff by approximately 25%. This approach assumed that professional deference would be an effective professional reliance model. Professional deference is a professional reliance model whereby Government relies almost entirely on the assessments produced by the external professionals engaged by proponents and permittees to meet the Province's regulatory objectives. In a professional deference model, Government exercises minimal oversight and relies on external professionals to uphold the highest standards of professional integrity and impartiality when conducting assessments on behalf of proponents and permittees.

Several significant cases of environmental mismanagement, including the Mount Polley dam breach in August 2014 and the Shawnigan Lake contaminated soil landfill in 2017, both of which received extensive media attention, led to the recognition that professional deference is an inadequate model in the management and stewardship of natural resources. The Province commissioned a professional reliance review that resulted in the May 2018 *Professional Reliance Review: The Final Report of the Review of Professional Reliance in Natural Resource Decision-Making* by Mark Haddock (also referred to as 'Haddock Report'). Among the over one hundred recommendations provided in the Haddock report, the BC Government has implemented two primary ones to date: the establishment of an Office of the Superintendent of Professional Governance (OSPG) and the passing of the *Professional Governance Act* (PGA), which legislates key aspects of professional reliance in British Columbia.

1.3 The Professional Reliance Task Force

As mentioned in the Executive Summary, the Professional Reliance Task Force (TF) was established as part of the 2019 16th Collective Agreement between the PSA and PEA, where the two parties agreed that there was value in discussing the implementation of the recommendations of the Professional Reliance Review (Haddock, 2018).

From the fall of 2019 to the early spring of 2020, the Employer-side and PEA-side of the Task Force worked together towards the achievement of the Task Force objectives. As defined in the Terms of Reference, Employer representatives were to include an ADM who would be responsible for chairing the meetings. This role was initially filled by Jennifer McGuire until her departure from the Task Force when she transferred to a new position and left the Ministry of Environment and Climate Change Strategy. The position of Chair of the Task Force was never actively filled after Jennifer left and no joint meetings were held. Further, due to challenges related to the COVID-19 pandemic, the Task Force became inactive from April 2020 to December 2020. The PEA-side of the Task Force was re-established in the spring of 2021 with both original and new members, and has worked towards the preparation of this document.

Below is the list of the key meetings attended by the Joint Task Force and PEA-side of the Task Force.

Joint Task Force Meetings

- October 10, 2019 – Inaugural in person Meeting of the Joint TF
- November 8, 2019 - Meeting of the Joint TF with Mark Haddock
- December 4, 2019 – Meeting of the Joint TF
- February 12, 2020 - Meeting of the Joint TF with Paul Craven, OSPG
- February 20, 2020 – Meeting of the Joint TF with Executives from ABCFP, BCIA, EGBC

PEA-side of the Task Force Meetings 2020-2021:

- December 16, 2020
- February 8, 2021
- April 7, 9, 14, 2021
- October 8, 18, 2021
- November 5, 12, 26, 2021

The PEA side also worked with Evidence for Democracy in the months leading up to the report published in June of 2020 by Tej Heer and Kimberly Girling called “Spotlight on Integrity: An update on the state of science in British Columbia.” (available at: <https://pea.org/system/files/E4D%20Spotlight-On-Integrity%202020.pdf>)

2. Professional Reliance

2.1 Definition

The Haddock Report indicates that professional reliance comprises the following five elements:

- **Delegated Responsibility.** *“Government delegates responsibility for aspects of regulatory process (i.e., evaluation, planning, and assessments) to qualified professionals”.*
- **Delegated Decision-Making.** *“Direct government oversight is reduced and responsibility for decision-making on certain decisions is delegated to qualified professionals and proponents”.*
- **Results-Based Regulatory Model.** *“Qualified professionals use their expertise to determine most appropriate approach to meeting desired outcomes and objectives set by government regulation.”*
- **Self-Regulation.** *“Professional organizations develop and enforce rules addressing: requirements for training, education, and experience; standards of practice; codes of ethical conduct; and continuing professional development.”*
- **Compliance and Enforcement.** *“Government retains authority to ensure that proponents are in compliance with environmental regulations, and to take compliance and enforcement actions where necessary (e.g., compliance orders, remediation orders, violation tickets, administrative penalties, and prosecution).”*

2.2 Provincial Government Professional Reliance Model

The provincial government implements a professional reliance model whereby government staff reviews and independently assesses the information and interpretations produced by external professionals, to issue permits and exercise compliance involving the use of natural resources.

Across ministries and program areas, the government is at different stages in the continuum of advancement towards a comprehensive, sustainable professional reliance model. A unique example of a well-established prescribed PR model exists within the Land Remediation Section of the Ministry of Environment and Climate Change Strategy. The ministry is authorized under the *Environmental Management Act* to designate qualified persons to perform specific activities, prepare reports or make recommendations that may be or are required to be performed by an approved professional. Ministry Statutory Decision Makers rely on the external expertise of members of the Society of Contaminated Sites Approved Professionals (CSAP) to review and recommend on contaminated sites applications for non high-risk sites. Members of CSAP are professionals with demonstrable expertise in the investigation and remediation of contaminated sites. The CSAP Society conducts random and targeted audits of the applications being submitted and has also developed both an accreditation process and a discipline process.

Although there is a continuum of advancement towards a more robust PR Model across ministries and program areas, there are several shortcomings identified within the current typical model relating to all the five aspects of Professional Reliance:

- **Delegated Responsibility.** The current model relies excessively on external professionals, with government having insufficient professional capacity to review and independently assess the information and interpretations provided by external professionals. The need for more government professionals to exercise adequate oversight is captured in the Chief Inspector of Mines' quote included in the Haddock Report: *"The Regulator must maintain sufficient technical capacity to conduct appropriate oversight of the professional opinions on which it relies."*
- **Delegated Decision-Making.** The Haddock Report identifies a direct relationship between the diminished role of Statutory Decision Makers, and the ability or desire to question external professional opinion, stating this was most prevalent in forestry *"but can occur wherever resource managers see their primary duty as advocating or facilitating for a particular industry [as opposed to regulating it]."*
- **Results-Based Regulatory Model.** A results-based regulatory model that includes monitoring or check-ins and milestone timelines for review throughout the process has the benefit to minimize the need for regulatory enforcement. An example of such a model is the Regional Operations Branch of ENV, which has an evaluate-set-check model that sets environmental guidance water quality guidelines for authorizations in consideration and support of the Contaminated Sites Regulation standards. Further, the contaminated sites professional reliance model includes an established random and targeted performance assessment process, to evaluate the quality and adherence to regulatory requirements of the reviews conducted by Approved Professionals in CSAP for non high-risk sites. While some areas of government are currently operating according to this type of model, many program areas are not, and this can lead to placing too high of a burden on regulatory compliance and enforcement.
- **Self-Regulation.** The BC Government has responded to the recommendations related to self-regulation provided in the Haddock Report with the enactment of the PGA and establishment of the OSPG. One of the key aspects of the PGA is the requirement that firms and organizations employing professionals should be regulated by the relevant professional licensing bodies. There is however still lack of clarity on how the Natural Resource Ministries will be regulated as firms under the PGA.
- **Compliance and Enforcement.** Compliance and Enforcement (C&E) activities can only occur when monitoring is in place, as noted in the Haddock Report: *"monitoring has long been identified as an essential pillar of professional reliance regimes."* Monitoring must also be complemented by the review of the monitoring reports generated through various authorizations and orders. There is currently not enough professional staff to conduct compliance and enforcement activities, carry out monitoring programs and review monitoring reports. As a result, some C&E groups in the Natural Resource Ministries are often unable to deliver their basic mandate.

3. Right to Title and Practice

3.1 Definition

This is the notion that individuals wishing to use a professional title and to practice in certain areas of professional expertise in the Natural Resource sectors must be authorized to do so by the relevant professional regulatory body. Unauthorized use of title and practice can lead to disciplinary action under the PGA (*Division 3 – Audits, Practice Reviews and Discipline*).

3.2 Recommendations

The professional reliance model currently used in the Natural Resource Ministries is based on employing public officials with decision-making authority (Statutory Decision Makers, SDMs) who rely on Scientific Technical Officers (STOs) and Licensed Scientific Officers (LSOs) to inform their decisions. SDMs are not always registrants of a regulatory body, and may not have right to title and practice, whereas LSOs typically do and STOs may. While this model is generally adequate in most ministry operations (e.g., permitting, compliance, monitoring & stewardship), there are instances where SDMs should have the right to title and practice to exercise their duties.

Job descriptions for SDM, STO and LSO positions frequently have inadequate requirements for professional registration, which may lead to hiring individuals without right to title and practice in areas that are required of these positions.

Considering the above, the following is recommended:

Recommendation #1. Conduct a thorough review of the duties and responsibilities of SDMs under the legislation administered by the Natural Resource Ministries and determine whether their position should require them to obtain the right to title and practice in specific areas. Practicing professionals as defined by the OSPG should be encouraged to maintain their professional designation and continuing professional development with support from the Employer. Compensation for annual dues should be provided by the Employer and continuing professional development requirements set by the licensing body should also be supported. This strategy should apply whether the professional is an LSO or excluded (i.e., non-PEA) employee.

Recommendation #2. Conduct a thorough review of STO and LSO positions, as follows:

- Identify activities included in the job descriptions for which right to title and practice apply;
- Identify the regulatory body responsible for regulation of the right to title and practice of the activities identified above; and
- Update the licensing requirements in the relevant job descriptions and postings.

3. Ministry Staffing Levels

3.1 Definition

Staffing levels are referred to in the Haddock Report (Recommendation #34) as the number of professional government employees available to ensure appropriate level of government oversight to protect public interests. More broadly, staffing levels also refer to where professional staff fit in the government organizational structure, since the supervisory and reporting duties of professional government staff influence their ability to support the government's oversight role.

The Land and Natural Resource Operations Secretariat – a BC Government group that was recently established to investigate how the Natural Resource Ministries could be re-structured to improve governance and resource stewardship – recently reported the following in a “What We Heard – External Engagement” session:

- *“Professional staff have developed effective working relationships but are stretched beyond their means.”*
- *“More experienced staff should be hired to increase capacity and capability, improve the transparency and timeliness of the permitting process, enhancing and expanding the ‘one window’ approach to permitting industry sectors.”*

As a result of the late 2021 flooding in the lower Mainland, it has come to light that the government has known since 2010 that the river forecast center has been significantly understaffed by professional Hydrologists (Canadian Center for Policy Alternatives, 2021). The Province's Auditor General flagged similar concerns regarding staffing levels in 2018 (OAG, 2018). Other Natural Resource program areas suffer from staffing issues, with the consequences not yet realized.

3.2 Recommendations

Recommendation #3. Conduct a professional staffing analysis. The purpose of this analysis would be to identify the areas where understaffing of professionals affects the basic oversight function of government to the greatest extent. This would help improve recruitment planning and support a better allocation of salary funds. This analysis may be best conducted by an independent contractor external to Government.

Recommendation #4. Develop competitive recruitment and retention strategies. These may include:

- Highlight non-salary benefits of public postings
- Advertise postings also outside the BC Public Service website
- Pursue career laddering options and additional salary steps
- Engage in outreach to raise the profile of careers in the Natural Resource Ministries

Recommendation #5. Maximize the use of professional expertise. Professionals in the Natural Resource Ministries often spend much of their time on tasks that don't require the level of professional expertise they can offer. Professional expertise would be better used to develop and update natural resource management plans and in the review of major permit/license applications that involve complex assessments, than in the routine processing of relatively simple permit/license applications. Natural resource management plans would also help streamline the processing of routine applications, while ensuring optimal allocation of natural resources and protection of natural habitats. Professional expertise could be better used also by relieving LSO staff of their non-technical, HR supervisory duties. Where possible, these opportunities should be explored. Removing non-technical supervisory duties would release time for LSOs to devote to technical work. Technical supervision, mentoring and peer reviewing should nonetheless continue, to ensure that government applies an effective professional reliance model within the organization, as well as with external QPs.

4. Availability of Resource Information

4.1 Definition

The Haddock Report (Section 5.4) indicates that the availability of information related to the Province's natural resources is essential to ensure that resource management decisions maximize the benefit to the public. The Haddock Report also highlights that government becomes more dependent/reliant on the information obtained by proponent-hired qualified professionals when this information is lacking.

Relying on proponent-hired professionals for the acquisition of resource information has the potential to affect the integrity of resource management decisions.

The Province's inability to make informed resource management decision as a result of lacking information increases the Province's vulnerability to lawsuits.

The recent BC Supreme Court decision on the lawsuit from Blueberry River First Nation (Blueberry) against the Province (*Yahey v. British Columbia*, 2021 BCSC 1287) is a notable example of a lawsuit against the Province that resulted from lacking resource information. In this court case, the BC Supreme Court determined that the Province infringed on Blueberry's Treaty 8 rights by permitting cumulative effects from industrial development, and issued a declaration whereby the Province may not authorize further activities that infringe Blueberry's rights [*Yahey v. BC*, para 1894]. This prohibition is suspended for a six-month period to provide the parties an opportunity to negotiate changes to the regulatory regime, to ensure Blueberry's rights are recognized and protected [*Yahey v. BC*, para 1895].

The Province authorized activities in Blueberry's territory with cumulative effects that lead to the infringement of Treaty 8 rights, because, without baseline resource information, the Province was unable to assess the cumulative effects of industrial developments and make informed permitting decisions.

The requirement for the joint development of an assessment and decision-making process within the very tight timeframe of six months and the potential restriction on the Province's ability to issue authorizations places significant pressure on the Province. This court ruling also sets an important precedent in support of future similar lawsuits against the Province.

4.2 Recommendations

Recommendation #6. Increase the accessibility of the natural resource information collected by the Province. The Province collects directly (i.e., through provincial monitoring programs) large amounts of information on natural resources, but this information is often organized in a way that limits ease of access (e.g., databases of related variables are not connected, data entry protocols and QA/QC procedures are lacking or inconsistent, some historic information is still in paper format only). Funding and resources should be allocated to improve the interconnectivity and ease of use of database and GIS platforms, to increase the accessibility to the existing information.

Recommendation #7. Increase the accessibility to Government 'in-house' natural resource assessments and studies. While studies carried out by external Qualified Professionals with Government funding are publicly available and relatively easily accessible, the assessments and studies conducted by Government professional staff are not typically uploaded on Government platforms. Nonetheless, these internal studies are highly

valuable and as such should be shared with the public. Privacy assessments should be conducted to ensure that the information included in the in-house studies can be made available publicly.

Recommendation #8. Increase the requirements for data upload from permittees. Data upload clauses should be introduced in permits and authorizations, whereby permittees would upload the monitoring data required by the permits onto the Province's publicly accessible databases. In tandem with the introduction of data upload requirements, Government should invest more IT resources to improve the efficiency of the upload, storage and retrieval of the data provided by permittees.

Recommendation #9. Enter into data sharing agreements with Indigenous Nations and other levels of government. Monitoring data are often collected not only by the Province and permittees, but also by First Nations, regional districts, municipalities and other stakeholder organizations, such as irrigation districts. The professionals dedicated to monitoring would be ideally suited to assist with engagement to explore options for data sharing and uploading the shared data on BC public databases.

Recommendation #10. Increase outreach initiatives. These activities would have the goal to provide the public with information on what natural resource data are available on the Province's databases, how to access and interpret the data. Outreach activities may include workshops, open houses and school outreach programs.

5. Government as a Knowledgeable Owner

5.1 Definition

The function of Government as Knowledgeable Owner of the Province's natural resources is defined in the Haddock Report by using an observation the Chief Inspector of Mines made in his review of the Mount Polley Tailings Storage Facility breach: *"The Regulator must maintain sufficient technical capacity to conduct appropriate oversight of the professional opinions on which it relies."*

For Government to fulfill its function of Knowledgeable Owner, technical capacity must complement the availability of data on natural resources.

5.2 Recommendations

Recommendation #11. Use Government professional expertise to develop resource management plans.

Government is required to develop and update natural resource management plans under multiple legislations. Natural resource management plans are a key tool to characterize and optimally manage the Province's natural resources. Permitting and compliance functions should be carried out within the framework of resource plans, and, in turn, plans would significantly streamline permitting and compliance activities. Technical experts are ideally suited to develop resource plans, since they have the expertise to understand the complexity of natural systems. Government should therefore prioritize the development of these plans and leverage more on in-house technical capacity to develop them.

Recommendation #12. Increase field data collection efforts and funding. Government-led environmental monitoring is essential to validate and complement the data and interpretations provided by First Nations Governments, proponents, permittees and interest groups. The Government should increase the funding for environmental monitoring programs throughout the Province, but specifically in the regions where human development and climate change apply the greatest environmental pressure. The extensive flooding that affected the Province in November 2021 is strong evidence that more data is urgently required to improve natural resource management and identify effective adaptation measures to climate change. The funding would be used to hire more professional staff with expertise in the design and implementation of monitoring programs, purchase monitoring equipment and augment the size of existing monitoring programs.

Recommendation #13. Increase professional capacity of Compliance and Enforcement (C&E) staff. Increase professional capacity in the C&E areas across the natural resource ministries, by creating more LSO positions within the C&E programs. C&E activities often require a level of technical expertise that cannot be adequately provided by non-professional staff receiving ad-hoc technical support by LSOs. Where C&E activities require extensive technical expertise, these activities should be carried out by dedicated LSOs.

6. Next Steps

We acknowledge that, according to the Terms of Reference of the Professional Reliance Task Force, recommendations for an improved professional reliance model in the BC Natural Resource Ministries were intended to be the result of collaboration between the members of the Task Force representing the Employer and the PEA GLP Chapter. Regrettably, the Employer representatives of the Task Force left in early 2020 and no other representatives have since replaced them. The recommendations offered in this document were therefore prepared exclusively by the PEA-side of the Task Force.

Although the mandate of the Professional Reliance Task Force is due to expire on December 31, 2021, the undersigned Task Force members remain available to discuss the recommendations included in this document with Executive representatives of the Employer who may be available and interested in improving the professional reliance model in the BC Natural Resource Ministries.

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British Columbia, 3 December 2021

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