towards environmental sustainability

PROPOSED REGULATORY FRAMEWORK FOR MANAGING ENVIRONMENTAL CUMULATIVE EFFECTS

Alberta Environment

A healthy environment is highly prized by Albertans. We want and expect clean air, land and water.

contents

introduction

A healthy environment is highly prized by Albertans. We want and expect clean air, land and water. When Albertans talk about environmental sustainability, they are expressing a desire that what they value in the environment will be maintained into the foreseeable future. They recognize that there are environmental limits and pushing those limits can result in significant impacts to our environment, our way of life, and our quality of life. Achieving the appropriate balance between environmental protection and economic development is ultimately a matter of societal choice. We need to understand the tolerance the environment has for human activities and choose a balance of social, economic and environmental objectives.

Environmental sustainability *means living within defined environmental limits; maintaining the qualities that are valued in the environment, now and for future generations.*

Cumulative effects *means the changes to the environment caused by all past, present and reasonably foreseeable future human activities.*

Managing the pressures of growth in the province, governing with integrity and transparency, improving Albertans' quality of life, building a stronger Alberta – these are some of the priorities of the Government of Alberta. Those growth pressures affect the environment – in addition to the infrastructure, affordable housing and labour issues. To address pressures on the environment, the Government of Alberta is developing a new environmental management regulatory framework. This policy paper describes a new approach to enable sustainable development by addressing the cumulative effects of development on the environment. It includes a proposal for new legislation to enable the framework.

This policy paper is intended to stimulate discussion on the proposed framework. All Albertans are invited to provide input to the development of the proposed new legislation. The Alberta government will work with Alberta industries, municipalities, First Nations, and non-government organizations to refine the legislative proposals and their implementation.

There are other ongoing initiatives being undertaken by the Government of Alberta that overlap in scope and subject matter. They include the Land-use Framework and renewal of *Water for Life*. This paper should be considered a proposal that can contribute to the progress of those other initiatives.

need for action

RISKS TO THE ENVIRONMENT

Economic growth has challenged the government's ability to keep up with the regulatory review and approvals processes for the large number of existing and proposed projects and their impact on the environment.

Despite Alberta's high environmental standards, the cumulative effects of current and future growth could potentially affect the quality of Alberta's environment—our air, land, water and biodiversity. Increasing human activity is creating a larger human footprint on landscapes.

Parts of Alberta may be reaching some environmental thresholds. For example, water is becoming an increasingly scarce resource. Under the South Saskatchewan River Basin Water Management Plan, no new water allocations are available in most of the South Saskatchewan basin. For many areas, environmental thresholds have not been determined. With increasing pressures on landscapes, environmental quality may be compromised. More information is needed to determine what the consequences are to different levels of stress on the environment, and what consequences are considered acceptable or unacceptable. This will require the involvement and resources of many partners.

Environmental values and risks cannot be considered in isolation from human health, economics and social values. Albertans desire a balance of all those values, and the current management framework may not provide it.

RISKS TO THE ECONOMY

Potential declines in environmental quality could affect economic investment and development in the province in several ways. The public may withdraw companies' 'social licence to operate' and apply market pressure or political pressure for regulatory action. Secondly, workers and companies are attracted to locate and stay where there is a high quality of life, and that attraction could be compromised.

The uncertainty, cost and delays associated with considering the same issues repeatedly for each regulatory application does not benefit economic activity or the environment. Alberta's economy, largely dependent on developing its natural resources, will remain healthy only if the environment remains healthy.

Fast Facts
In the past 25 years, Alberta's population has grown to 3.5 million from 2.3 million, an increase of 52 per cent.

Alberta's exports of goods and services more than tripled between 1995 and 2005 to $87.8 billion. A growing number of those exports are manufactured products and services. Exports of manufactured goods more than doubled over the same period.

Crude bitumen production is expected to grow from 73 million m^3 in 2006 to over 164 million m^3 in 2015.

***Biodiversity** means the variability among living organisms and the ecological complexes of which they are a part, and includes diversity within and between species and ecosystems.*

***Stewardship** means individuals, communities, corporations and governments taking responsibility for caring for the environment as a whole (including air, land, water, biodiversity) and passing healthy ecosystems on to future generations.*

a results-based approach to environmental sustainability

The Government of Alberta is proposing a reformed management system that would more effectively address the cumulative effects of all human activities on the environment while providing economic opportunity and greater certainty.

The reformed management system starts with setting environmental objectives that reflect our understanding of environmental risks and our socio-economic values, and then managing within those objectives. There is a balance between environmental quality, social values and the intensity of economic activities that we choose to pursue on any given landscape. Making those trade-offs, and the resulting levels of environmental protection, is a matter of social choice. The results-based approach would make those choices more conscious and explicit.

This is not, however, about shutting down development. Rather, it is about anticipating future pressures and, as a society, choosing the balance we want. It is also about driving innovation and continuous improvement in all sectors.

The new approach is neither a replacement of existing project regulatory requirements, under such legislation as the *Environmental Protection and Enhancement Act*, nor is it another layer of requirements for industry. The new approach is also neither a move to "deregulation" nor a voluntary approach to management.

Environmental regulation will have its place in the new system and individual companies will still need to know and be held accountable to enforceable requirements. Each department and board will continue to fulfill its mandate. The new approach enables a full toolbox of non-regulatory and policy tools, including economic incentives, education and voluntary action all aimed at achieving the objectives.

This results-based approach stands in contrast to the existing regulatory system, which is primarily based on managing and mitigating the impacts of individual projects, often through legislation aimed at specific resources, such as timber or water. Under current legislation, the issuing authority may attach conditions to an authorization to control the environmental impact of the proposed activity. The system is limited in its ability to address the cumulative effects of a number of individually regulated projects and unregulated activities, or to consider impacts across air, land, water and biodiversity in an integrated manner.

The new approach will evolve the present environmental management system to include cumulative effects management as part of regular business. Currently cumulative effects management is limited to assessment as an "add-on" at the end of the design of large projects, which does not consider future growth in non-project activities; does not apply to entire geographic units (e.g., landscapes or watersheds) over which environmental impacts are felt, forecasts only a short time into the future; and is often highly repetitive, as subsequent projects cover almost identical material.

Regional assessment and projections will be addressed over more meaningful geographic scales and time spans. In addition, project approvals and other authorizations based on generic standards or on technology will be phased out, to be replaced by approvals based on how particular projects relate to shared regional objectives.

ELEMENTS OF THE SYSTEM

The proposed system framework will be based the following design elements.

Driven by clear objectives

The system will be driven by clear objectives for the desired quality or state of the environment that Albertans want to experience now and in the future, while recognizing the social, economic and environmental implications of meeting those objectives. This means human activities will be managed to achieve this desired state of the environment.

Place-specific objectives

Different places may have different environmental objectives. "Place" is defined geographically and at different spatial scales (provincial, regional and sub-regional).

Adaptive

The system can adapt to change when performance results are not satisfactory, or risk being unsatisfactory in the future, or when circumstances change.

Shared stewardship

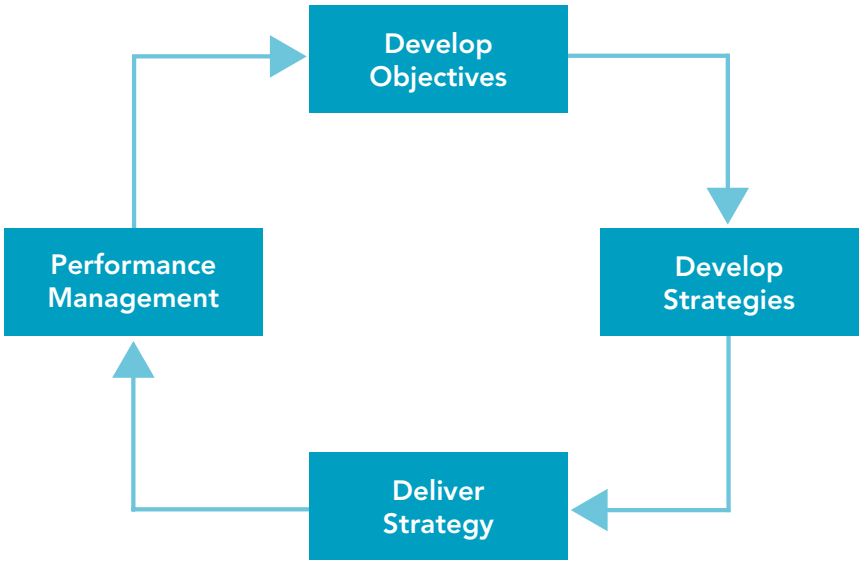
Collaborative development of objectives and implementation will promote a culture of shared stewardship and build commitment for the shared responsibility to achieve objectives.

Knowledge based

The foundation of the system is a sound knowledge base composed of information on the state of the environment, levels of human use and projections of use, and impacts into the future, including environmental risks.

MAKING THE ELEMENTS WORK TOGETHER

This is a results-based system, driven by the results of all human activity on the environment and what society wants those results to be. Running the system involves developing the objectives, developing strategies to achieve the objectives, carrying out the strategies, assessing performance and adjusting actions where actual or projected results are not what are desired.



The table below summarizes the differences between the current system and what is proposed.

	Current Approach	What is Needed
Environmental media	Single (one by one)	Air, land, water and biodiversity together
Spatial context	Project/local	Multiple scales
Scope	Regulated activities	Regulated and unregulated activities
Approach	Reactive	Proactive
Results	Mitigated impacts	Defined results
System organization	Fragmented	Connected
Responsibility/participation	Agency-by-agency	Collective action
Performance measurement	As required	Essential, more comprehensive

Links to Current Initiatives

The Alberta government's response to environmental concerns has included strategies and initiatives like *Water for Life*, the Climate Change Action Plan, Clean Air Strategy for Alberta, Biodiversity Strategy, and Land-use Framework. Several of these are underway now, or are planned for the future. As they grow and are developed, these initiatives are the building blocks of a new system that can be more responsive to the requirements of environmental sustainability.

The Alberta government has also undertaken the Sustainable Resource and Environmental Management (SREM) initiative. SREM is an approach—a way of thinking and acting—to working together and taking joint responsibility to achieve agreed-upon natural resource and environmental outcomes. That cooperative approach across all related departments is essential to the successful achievement of the approach outlined in this paper.

proposed legislative framework

The Government of Alberta proposes to introduce legislation to support the realization of the new approach to environmental sustainability. The purpose of the legislation would be to establish an environmental management system that sets desired objectives for environmental quality for defined parts of the province and ensures human activity is managed to achieve those objectives. The legislation would be sufficiently flexible to support current, successful initiatives embodying some characteristics of the proposed system, while allowing evolution to the intended provincial design.

ROLES

The proposed system necessarily links the mandates of multiple provincial ministries. Implementation can only be successful if they work together in a more integrated manner. The legislation needs to enable and encourage their collaboration. The balance of environmental, social, health and economic objectives is a public policy choice for which the government as a whole is accountable. There must be clear accountability for making the system work as an integrated whole.

The system also depends upon other governments and upon many non-governmental parties: industries, the federal government, municipalities, First Nations, non-governmental organizations, landowners and citizens. The legislation needs to recognize and support various roles, both mandatory and voluntary.

The roles in what follows are generally:

- Cabinet is responsible and accountable to establish the public policy that balances environmental, social and economic objectives.
- One organization acts as "systems coordinator," responsible for putting the system elements in place and supporting collaboration among responsible government departments. That role could be fulfilled by a single minister (and the department under him or her) or by some new coordination office within the provincial government but outside of a single department. In what follows, the systems coordinator is referred to as "the Minister."
- All departments in the Government of Alberta work together to make the system work and to achieve agreed upon objectives. Departmental mandates are respected.
- Stakeholders and other governments advise and make recommendations to the Government of Alberta on objectives and strategies to achieve those objectives. They collaborate on carrying out strategies and monitoring results.

The following sections describe the proposed contents of the new legislation: Planning Areas; Environmental Sustainability Objectives and Strategies; Options for Developing Objectives and Strategies; Monitoring, Assessment and Reporting; and Framework for Environmental Sustainability Objectives.

PLANNING AREAS

Planning areas would be based on provincial direction received through initiatives including *Water for Life* and the Land-use Framework. Watersheds, natural sub-regions, airsheds and/or other appropriate factors could be used, as well as pre-existing planning areas, such as those established under the *Water Act*. The Minister could establish them at one time, or on an as-needed basis.

***Planning area** means a place or location designated by the Minister with defined geographical limits or boundaries (for which Environmental Sustainability Objectives and Environmental Sustainability Strategies will be developed). Planning areas may vary in scale.*

Eventually it is expected that the province would be covered with a set of contiguous planning areas. Those areas would be "nested." For instance, if the larger planning areas were based on natural regions or major watersheds, there could be planning areas at a more local scale, based on natural sub-regions or sub-watersheds. Nested planning areas would allow creation of a hierarchy of environmental sustainability objectives.

A common planning base would support integrated planning for air, land, water and biodiversity. Environmental management based on natural boundaries could more effectively address cumulative effects on landscapes, watersheds and airsheds.

There will be a transition period where there may be a mixture of overlapping, existing and new areas that are based on watersheds, air sheds, and land units, etc. The Land-use Framework and work under *Water for Life* may recommend a new basis for planning areas. The proposed legislation would be flexible enough to allow evolution to whatever system emerges.

ENVIRONMENTAL SUSTAINABILITY OBJECTIVES AND STRATEGIES

The proposed legislation would enable the creation of "Environmental Sustainability Objectives," and "Environmental Sustainability Strategies" for planning areas or for the entire province. The objectives would establish quantitative, measurable levels of ambient environmental quality (i.e., what we want the state of air, land, water and biodiversity to be) for planning areas or parts thereof. While the objectives developed would be specific to desired environmental results, they would be developed in consideration of economic, human health and social implications as well. That is their fundamental connection to the overall goal of sustainable development.

Setting clear, measurable objectives would enable all regulated and unregulated activities within a planning area to work within defined environmental limits, effectively addressing the cumulative effects of all activity on the planning area's environment.

Environmental Sustainability Objective *means a quantitative, measurable level of desired ambient environmental quality or end state (i.e., air, land, water and biological diversity).*

Environmental Sustainability Strategy *means an adaptive, coordinated set of measures, which may include policies, programs and regulatory and non-regulatory actions, to achieve Environmental Sustainability Objectives. The strategies will include performance indicators, and monitoring, evaluation and reporting.*

Objectives must be more than wish lists. There is little point in establishing them without having a plan to achieve them, and a commitment to follow through on them. This highlights the importance of Environmental Sustainability Strategies. Indeed, in order to understand what objectives are possible and what the tradeoffs with other objectives would be, one must understand the options for achieving them. Thus, objectives and strategies to achieve them need to be developed together.

The strategies would identify actions to achieve environmental sustainability objectives and provide guidance as to how to implement those actions. They could also include prescribed regulatory requirements, economic instruments (tools), education and awareness, and voluntary agreements. The strategies would identify actions not only by governments, but also by all other sectors and by individuals. The strategies could comprehensively cover all or only some of the objectives for a planning area.

In addition, each strategy would need to include a performance management plan, including indicators for each objective, how the indicators will be monitored, who will be responsible for monitoring and how the results would be used. Where assessment indicates that objectives are not being achieved or may not be achieved in the future, further action would be required, which might include better compliance with the strategy or revision of the strategy.

The objectives and strategies need to be based on sound, shared information and knowledge. The knowledge base needs to include:

- The historical and current state of the environment, economy and communities within the planning area;
- Anticipated future trends, needs and opportunities;
- Current and emerging issues.

The knowledge base would provide the basis for reconciling desires with possibilities. Potential trade-offs would become more clear. The knowledge base could be developed through a formal regional assessment or as part of an ongoing effort.

Development and Implementation of Objectives and Strategies

The legislation would enable the Minister to initiate development of objectives and strategies for one or more planning areas or the whole province. The Minister would provide terms of reference, including clear timelines for completion.

Where recommended by the Minister, Cabinet could:

- Adopt a proposed objective, strategy, or part of a strategy, with or without modification;
- Adopt proposed revisions to an existing adopted objective or strategy, with or without modification;
- Revoke an adopted objective or strategy;
- Adopt an objective or strategy developed under other legislation before the new legislation comes into force, where it has been developed in a manner consistent in spirit to that defined under the new legislation. Adopted objectives and strategies would be published.

Only those parts of strategies that are within the mandates of government departments or require provincial government action would be formally adopted by Cabinet. Other actions would be voluntary contributions by other stakeholder participants.

Development of objectives for any planning area would be "nested" under the relevant adopted provincial objectives. This provision would ensure consistency between planning area objectives and provincial objectives.

Adopted objectives and strategies would form government policy that would have to be considered when making decisions that affect the environment by departments across the provincial government. Those decisions would be established in regulations.

Activities under municipal authority can have a significant effect on the environment. Thus, municipalities have an important role to play in the development and implementation of objectives and strategies. Regulations defining decisions that would have to consider objectives and strategies could also apply to municipalities. Before any such regulations would be considered, the Minister would consult with municipalities.

Other participating governments and non-government decision-makers would be encouraged to use objectives and strategies to guide their decisions.

The actual process used to develop the objectives and strategies will need to integrate with and accommodate other planning processes being developed under other government initiatives, such as the Land-use Framework. The process will need to be flexible, to allow for different scales and circumstances and to allow for evolution and improvement over time. At the same time, there needs to be some consistency on the fundamentals and expectations.

OPTIONS FOR DEVELOPING OBJECTIVES AND STRATEGIES

The legislation could identify specific options for whom the Minister could ask to develop objectives and strategies. Alternatively, the legislation could simply leave this to the Minister's discretion without specifying any options.

If the legislation specifies the options for organizations to develop draft objectives and strategies, two options could be considered:

- Multi-stakeholder partnerships of stakeholders and governments, or
- Alberta government-appointed advisory committees.

The two options are described in the following sections.

Multi-stakeholder Organizations

One option for developing draft objectives and strategies would be to rely on multi-stakeholder organizations – voluntary partnerships composed of provincial or more local interests who agree to work together to achieve mutually beneficial results. Those groups would develop and recommend draft objectives and strategies to government for its consideration. The Water Planning and Advisory Councils established under *Water for Life* provide a potential model. The multi-stakeholder organizations would have broad, inclusive involvement, typically including interests from industry, conservation, municipal government, other community, landowners and Aboriginal governments. Alberta government staff would be active participants as well as serving in an advisory or resource capacity.

If this option is to be incorporated into legislation, it could include provisions to support the creation and operation of multi-stakeholder organizations. The support could be for base operations; assistance in the development of guidelines, objectives and strategies, or for implementation of strategies. Multi-stakeholder organizations would be independent organizations free to undertake unfettered discussion of issues and their resolution. Government would encourage their formation, support their operation, and participate as members or partners. Government could influence their recommendations through direct participation.

Where such partnerships are unable or unwilling to carry out that work, the legislation would need to provide a "backstop" in which the government would appoint a group to do the work, as described below.

Government-appointed Advisory Committee

Another option for developing objectives and strategies is for government to establish one or more advisory committees. To build support and commitment for this government-appointed process, membership would include representation from relevant departments and would have to provide effective and balanced involvement of stakeholders and other governments. The process would use well-established processes for consultation and collaboration among Government of Alberta departments, other governments and stakeholders.

MONITORING, ASSESSMENT AND REPORTING

Monitoring

Many of the elements of the required monitoring and evaluation system exist now or are being developed. Under the proposed approach, actual monitoring would continue to be the responsibility of industry, government departments and in some cases, multi-stakeholder organizations. Monitoring would continue to include both project-specific monitoring (e.g., plant emissions), as well as ambient quality monitoring. The emphasis, though, would be increasingly shifted toward ambient quality as it relates to Environmental Sustainability Objectives.

Assessment and Reporting

Transparent reporting is an important part of transparent government. It also helps build support for actions that may be required to achieve shared objectives. The system requires a robust reporting mechanism that regularly evaluates and reports on monitoring results for each of the planning areas. In addition, there must be a means to adjust strategies and actions based on the evaluations.

Environmental Sustainability Strategies include the provision for assessing the status of the Environmental Sustainability Objectives using indicators. Environmental Sustainability Reporting uses these indicators to evaluate the progress that management and programs have made towards achieving the predetermined objectives. This reporting also serves as an audit to determine whether the objectives are adequate and whether the management and programs are driving the environmental factors in the right direction.

The Minister would publicly report annually on the status of achievement of objectives and on the degree of achievement and effectiveness of strategies. This information will guide and direct any changes that are necessary to achieve the objective or improve on its delivery.

State of the Environment Reporting: *State of the Environment reports cover important environmental factors that are monitored over time, in order to detect trends and identify environmental issues. They include indicators that reflect environmental conditions, pressures, and what is being done about these conditions and pressures.*

Environmental Sustainability Reporting: *A new emphasis is on indicators that measure and report on the progress of specific environmental management objectives. The indicators describe the environmental objectives (what we want to happen with respect to an environmental factor), the programs and management in place to achieve the objectives (what we are doing to make it happen) and the measurement of progress towards achieving or maintaining the objective.*

FRAMEWORK FOR ENVIRONMENTAL SUSTAINABILITY OBJECTIVES

Within one year of the legislation coming into force, the Minister would publish a framework to guide the development of objectives and strategies, in collaboration with other government departments and agencies and with appropriate involvement of the public and other governments. The framework would ensure consistency in approach, while allowing for evolution of the system and adjustment to align it with other ongoing initiatives, such as the Land-use Framework.

The framework might include:

- Criteria that the Minister may consider in establishing Planning Areas;
- Guidance to those developing Objectives and Strategies on their form and the process for developing them;
- Information and analysis appropriate for developing and assessing Objectives and Strategies;
- Guidance to those decision-makers required to consider Objectives and Strategies on the appropriate interpretation of those obligations;
- Consistency with "higher order" (e.g., provincial) objectives; and
- Appropriate forms of public and stakeholder involvement.

what the new system will accomplish

The new system will provide a holistic, system-based approach that recognizes broader results-based approaches for entire regions of the province.

As part of this holistic system, measurable environmental objectives will be set, and then implemented with our key partners, using a variety of means, and followed by reporting on progress. This new legislation will provide the architecture to accomplish those things, and in many instances, enable more collaborative decision-making about key directions.

The new system will provide benefits to all areas of society, from families and individuals, to communities, industry partners, other orders of government and environmental managers.

Families and individuals will benefit through the protection of their quality of life, and their health. The new system will promote a better understanding of the province's clear direction to advance environmental sustainability, and for how individual actions contribute to a greater whole.

Communities will benefit from greater involvement in decision-making systems based on community values. Communities will have a shared commitment to defining environmental objectives and achieving them.

Industry will benefit from clearer expectations up-front, greater flexibility in achieving those expectations and streamlined environmental impact assessments. Approvals and authorizations will be set on a more relevant regional basis. Some project-specific requirements will be eliminated; instead, each project's impact will be assessed in the context of a larger region.

Other orders of government will benefit by participating in leadership in a combined, united approach to conserving, protecting and restoring the health and diversity of Alberta's ecosystems. Albertans expect that all orders of government are cooperating across jurisdictional divides to protect our environment. By doing so, they will inspire residents to work toward a clear end-state of environmental sustainability.

Environmental managers will benefit by operating within a common frame of reference for all decision-makers. The new frame of reference will provide direction and support for the efforts of government approval-writers, municipal planners and forest management plan developers.

THE NEW SYSTEM PROMOTES INTEGRATION

We need a truly integrated, innovative approach that transcends environmental "compartments" of air, land, water and biodiversity and some of the central challenges, such as climate change, water scarcity and endangered species. Our society depends on the natural world for goods and services, including food, raw materials, flood prevention, medicine, pest control, climate regulation and cultural inspiration. The combined services of ecosystems are not separated into neat compartments, or by artificial boundaries.

Addressing the foregoing challenges will require that all aspects of cumulative effects management be undertaken under the umbrella of this legislation. New direction setting and associated actions across sectors and environmental media must be united under one environmental sustainability management system. The legislation will establish legal requirements and an ongoing institutional basis for cumulative effects management in the province.

next steps

Alberta is already using elements of the proposed approach at both provincial and more local scales. Examples include the Clean Air Strategic Alliance, *Water for Life* and Watershed Planning and Advisory Councils.

The Land-use Framework currently being developed will provide provincial-level direction and guidance for land use planning and management. The framework will provide an overall policy direction on Alberta's land issues and define processes, roles and responsibilities to enable governments, stakeholders and the public to address land issues at provincial, regional and local levels. It will be followed by a provincial Biodiversity Strategy.

The Alberta government will be piloting the new environmental sustainability management system in various parts of the province at different scales. The pilots are intended to:

- Address real and pressing cumulative effects issues;
- Test the approach in the real world to learn from experience and adapt;
- Demonstrate to the public and stakeholders what a results-based system is and how it can work.

Lessons from the pilots will help the evolution to the new system province-wide.

The Clean Air Strategic Alliance (CASA) was established in March 1994 as a new way to manage air quality issues in Alberta. CASA is a non-profit association and a multi-stakeholder partnership, composed of representatives selected by industry, government and non-government organizations. CASA recommends strategies to assess and improve air quality in Alberta. Stakeholders are committed to developing and applying a comprehensive air quality management system for all Albertans.

The Water for Life *initiative has resulted in the development of Watershed Planning and Advisory Councils along with Watershed Stewardship Groups. These bodies make recommendations to government, stakeholders and the public on improving water management throughout Alberta's watersheds through the development of watershed management plans.*

how you can be involved

Your views on the proposed approach and on the legislative proposals are important to us. We welcome your written comments on this policy paper.

This policy paper is available online at (www.environment.alberta.ca) or a copy can be mailed to you upon request, by phoning (780) 427-2700 (toll-free by first dialing 310-0000). If you have any questions about the policy paper, please call the toll-free number.

To provide comments on the policy paper, use the online form, fill out the questionnaire or send them directly via email envsust@shaw.ca, fax (780) 421-0028 or mail to:

Alberta Environment
9th Floor, South Petroleum Plaza
9915 - 108 Street
Edmonton, Alberta T5K 2G8
ATTN: Towards Environmental Sustainability

Deadline for comments is November 30, 2007. We look forward to receiving your comments and thank you in advance for your participation. Correspondence by email after that date should be sent to AENVsustain@gov.ab.ca.

HOW THE GOVERNMENT WILL USE YOUR INPUT

All the input received will be summarized and available online and in paper copy. Government will use the information in refining the proposals for this new legislation and its implementation.

All input will be treated confidentially and all individual input will remain anonymous.

notes

We need a truly integrated, innovative approach that transcends all areas and issues of the environment.

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