36 COMPLIANCE REPORTING

An overview of the Environmental Oversight Program is provided in Section 35.1.2 in Volume 5 Section 35 Summary of Proposed Environmental Management Plans. Specific aspects of the Program are described in this Section and a schematic is shown in Figure 36.1. Key members of the Project team, including the Environmental Monitors and Environmental Officer(s), would have specific responsibilities for reporting environmental performance and compliance.

36.1 Environmental Monitors

Each contractor engaged for the Project would be required to retain one or more qualified Environmental Monitors who would have the authority to stop work in the event of non-compliance with conditions, federal and provincial permits, management plans, applicable legislative requirements, and BC Hydro policies. BC Hydro would also retain one or more qualified Environmental Monitors who would have the same authority.

The role of the Environmental Monitors would be to inspect, evaluate, and report on the performance of construction activities and on the effectiveness of environmental control strategies and mitigation measures. One Environmental Monitor would be on-site whenever there is elevated potential risk to the environment, and would be periodically on-site during low-risk activities. Other roles and responsibilities of the Environmental Monitors would include the following:

- Developing an understanding of all aspects of the Project as they relate to conditions, federal and provincial permits, management plans, applicable legislative requirements, BC Hydro policies, and Project environmental management documentation
- Liaising with regulatory agencies and other key stakeholders
- Providing technical assistance on environmental matters to construction personnel
- Documenting construction activities with field notes and photographs
- Suspending construction activities that are causing, or potentially causing, risk of environmental damage
- Preparing environmental monitoring summary reports to summarize activities and actions taken to minimize potential effects during each phase of construction
- Reporting the results of environmental monitoring as required and in accordance with Project reporting protocols
- Reporting non-compliance with conditions, federal and provincial permits, management plans, applicable legislative requirements, and BC Hydro policies, in accordance with Project reporting protocols

36.2 Environmental Officers

BC Hydro would retain one or more Environmental Officers to inspect and evaluate the work of contractors' Environmental Monitors and to report to regulators. Roles and responsibilities of the Environmental Officers would include the following:

- Communicating potential Project effects and mitigation requirements to contractors
- Auditing the training of contractors' staff and field crews regarding project effects and mitigation requirements
- Liaising with regulatory agencies as required
- Reporting the results of environmental monitoring as required and in accordance with Project reporting protocols
- Reporting environmental incidents (an event that causes or has the potential to cause environmental damage or adverse effects on fish, wildlife, or other environmental resources) to regulators as required and in accordance with Project reporting protocols
- Reviewing the environmental compliance records to be produced by contractors or by the contractors' Environmental Monitors
- Auditing and evaluating compliance of contractor work practices and procedures
- Evaluating the effectiveness of mitigation measures during construction
- Assisting in emergency situations to minimize adverse environmental effects
- Suspending construction activities that are causing, or potentially causing, risk of environmental damage
- Ensuring that corrective actions are implemented in the event of an environmental incident or non-compliance with conditions, federal and provincial permits, management plans, applicable legislative requirements, and BC Hydro policies
- Reviewing and updating management plans to ensure that they remain current
- Providing technical assistance on environmental matters to construction personnel

36.2.1 Environmental Monitoring Plan

The Environmental Monitors would evaluate and report on activities associated with the construction of the Project with respect to conditions, federal and provincial permits, management plans, applicable legislative requirements, and BC Hydro policies. A detailed monitoring plan identifying the type and frequency of observations and data collection, methodologies to be employed, and protocols to be followed would be developed prior to commencement of the activity.