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Alex Pike Shares Her Insights on Canada's Proposed New Impact Assessment Framework with *National Magazine*

In an article published in *National Magazine*, Davies partner [Alex Pike](#) shares her perspectives on Bill C-69, a package of bills intended to reform Canada's system of impact assessment for major resource projects.

While the promise of C-69 was that it would put the science first, some of its critics contend that the proposed *Impact Assessment Act* doesn't establish scientific requirements that will address environmental degradation.

"Overall, I think the new law will act to require project proponents to undertake rigorous scientific work on the baseline conditions of their projects. So the science is being respected," Alex explains. "The question is whether the test the government is using here is going to politicize a decision that ought to be based on science. In the legislation, 'public interest' is never really defined. The bill lists factors to be considered in the test. It's fine to list those factors, but which ones have priority? How do you weigh them? They're not ranked, and that's a concern."

With respect to criticism of the bill's acceptance of "adaptive management" – the process by which project proponents improve their environmental management practices by studying them in action and learning about their outcomes – Alex cautions against throwing the good out with the bad, pointing to scientific support for adaptive management.

"To think that any test is going to provide such a clear-cut, go-no-go answer – that one project is completely unacceptable, while another is completely acceptable – strikes me as naïve. Adaptive management is a critical piece of the puzzle."