



Towards an Indigenous-Centric Cumulative Effects Framework

EXECUTIVE SUMMARY

Prepared by: Jennifer Cutbill, UBC Sustainability Scholar, 2022

Prepared for: Marian Ngo, ED, Salish Sea Indigenous Guardians Association (SSIGA)

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disclaimer

This Executive Summary was produced as part of the UBC Sustainability Scholars Program, a partnership between the University of British Columbia and various local governments and organisations in support of providing graduate students with opportunities to do applied research on projects that advance sustainability across the region. Specifically, this work was produced as part of UBC's Fraser River Estuary Collaborative (FREC) - a partnership between UBC and various NGOs and local / regional governments / groups supporting reciprocal relationships between graduate students and groups working to advance the health and sustainability of the Fraser River Estuary region.

This project was conducted under the mentorship of the Salish Sea Indigenous Guardians Association (SSIGA), PGL Environmental Consultants, and Landmark Resource Management Ltd. The opinions and recommendations in this report and any errors are those of the author and do not necessarily reflect the views of SSIGA, PGL, Landmark or the University of British Columbia.

knowledge governance

Indigenous Knowledge Sovereignty is core to this work. Drawing on knowledge governance principles shared by the First Nations Information Governance Centre ([OCAP](#)) only this Executive Summary and its enclosures is publicly shared. SSIGA retains control of the larger work.

acknowledgements, gratitude & relational accountability

Work for this project took place on the unceded ancestral lands of the x̣ẉməθḳẉəỵəm (Musqueam), Skwxwú7mesh (Squamish), Stó:lō and səliwətał (Tsleil- Waututh) Nations. I would like to thank my mentors Marian Ngo, Bridget Dunn, Corrie Allen and Chelsea Dale for their contribution, feedback and support throughout this project. The larger work draws on knowledges of Indigenous scholars, practitioners and communities across and beyond Turtle Island, and vitally on the knowledge and insights of staff from Kwantlen First Nation and SSIGA Leadership. I am grateful to each of them for sharing their energy and wisdom, and for this opportunity. I understand it as my responsibility in turn to respect and safeguard what they have shared to help ensure SSIGA-member Nations' Knowledge sovereignty.

positionality & limitations

While efforts have been made to centre Indigenous worldviews, values and voices, I – the author – am inherently limited in my understandings, being a settler of mixed European descent (primarily British on my father's side, and Scottish, Irish and French on my mother's side).

Born on the territories of the Anishinaabe, Haudenosaune and Huron Wendat Nations at the eastern tip of the Niigani-Gichigami ("leading sea" in Anishinaabemowin – currently also known as Lake Ontario), I moved to the **unceded** territories of the x̣ẉməθḳẉəỵəm, Skwxwú7mesh, Stó:lō and səliwətał Nations in 2007. Since 2011 I have lived in the place known in Skwxwú7mesh snichim as Xáywá7esks – meaning "separated points". Raising my daughter on these lands and waters I understand that I hold a deep accountability to these, and all Coast Salish Nations, who continue to reciprocally tend the inter-dependent health of the Salish Sea and all relations – water-based relations on which we all depend.

Image sources (for cover): background collage by author (2022); central image created by artist Jody Wilson for SSIGA. SSIGA's logo (in footer below) comes from elements of this artwork "symbolizing [their] people under the same Salish 'hat'". Both shared with permission.



EXECUTIVE SUMMARY

Introduction & Background

PROBLEM | The assessment and management of *cumulative effects** is a predominant approach for understanding and mitigating the negative impacts of development, and – at least in theory – for investing in positive ones. Recently-updated legislation related to cumulative effects management in so-called British Columbia[†] now includes mandates: to foster sustainability and well-being; to respect Indigenous Rights[‡], integrate Indigenous Knowledge; and to follow the precautionary principle. Yet, requirements remain discretionary and rooted within degenerative Colonial ways of knowing, being, doing and valuing. As such, though myriad failings have been robustly confirmed across scientific literatures¹, and now also, and most damningly, by the BC Supreme Court ([Yahey v BC, 2021](#)); dominant approaches continue to fail on all counts. The cumulative *impacts* of these failings are devastating for the interdependent health of the Fraser River Estuary, the Salish Sea, and for Coast Salish Peoples and all their relations; and are detrimental for all who ‘share’ their unceded² territories – i.e. the more than 8.7M people living in the Salish Sea’s catchment (equal to almost a 1/4 of Canada’s population)^{3,4} and all benefiting from their *gifts*. “The cost of doing nothing is staggering”⁵ – the profound depths of which exceed the limitations of Eurocentric mental models; and the fires, flooding and fishery collapses to date are but glimpses of compounding catastrophes to come if current approaches continue.

POTENTIALS | Coast Salish Nations (and Indigenous Peoples across the world) have stewarded healthy, holistic reciprocal relationships with their lands, waters and other-than-human relatives since Time Immemorial⁶; embedding responsibilities for doing so through their distinct legal orders, ways of knowing, and cultural practices. Scientists across disciplines agree that the compounding crises we now face – climate, biodiversity, eco-social justice, etc. – require *radical transformations* of status quo approaches, for which the re-centering of Indigenous Knowledge Systems and (co)governance are vital⁷. Towards this, recently-passed legislation in so-called Canada and BC ([DRIPA, 2019](#); [UNDRIPA, 2021](#)) now requires that federal and provincial laws be brought into alignment with [UNDRIP](#)⁸ – providing a legal framework for such transformation. Furthermore, Indigenous Knowledge Systems, honed over millennia, are resurging through an unbounded tapestry of Indigenous-centric approaches for addressing cumulative impacts, with vital learnings⁹ and compounding co-benefits for transformative paths forward.

Estuaries are among the most vital ecosystems on earth and the most at risk from cumulative impacts, making them among the most urgently in need of such transformations. As the largest estuary in so-called BC, one of the most biodiverse regions in the continent, and home to the

* Cumulative effects are commonly defined as: “changes to environmental, social and economic *values* caused by combined effects of past, present and future human activities/natural processes” ([BC Gov, 2021](#))

[†] Specifically the [BC Environmental Assessment Act \(EAA\), 2018](#) and [Canadian Impact Assessment Act \(IAA\), 2019](#).

[‡] EAA, 2018 only.



region's largest population, largest port, and largest salmon migrations, the Fraser River is a critical site for charting such paths. As Salmon are the life blood of the Coast Salish Peoples – hub of their collective identity, sacred legal orders and economies – reciprocal relations they have stewarded since Time Immemorial, it is imperative they are leaders of these efforts. The Salish Sea Indigenous Guardians Association (SSIGA) is poised to play important roles in this work; nurturing collaborative capacities and Indigenous-centric approaches across a growing number of Indigenous Governments, groups and allies working towards shared goals.

PURPOSE | United in mandates to grow collaborative capacities for protecting the Fraser River Estuary, SSIGA and University of British Columbia (UBC)'s Fraser River Estuary Collaborative have come together¹⁰ to support the development of an Indigenous-centric cumulative effects framework. **Specific objectives** are threefold: **(1)** to support SSIGA in exposing systemic failings of currently-dominant approaches (legislation, policies, practices, etc.); **(2)** to gather and accessibly share learnings from Indigenous-centric approaches; and **(3)** to synthesize learnings and sketch clear approaches (principles, methods, steps) for establishing an Indigenous-centric cumulative effects framework – one that supports self-determination of SSIGA member Nations and upholds their distinct legal orders in together stewarding the seven-generations health of the Salish Sea and all their relations (human and other-than-human).

Approach

Methods included a review of key current legislation, policies, guidance documents, and case law relating to cumulative effects; a review of broad and diverse range of Indigenous-centric approaches¹¹; and an integrative literature review of relevant critiques by experts across disciplines / knowledge systems¹². Learnings were upgraded via small-group workshops (one with environmental assessment and cultural anthropology consultants¹³; two with SSIGA member Nation staff); and further refined via iterative input from SSIGA Board members and technical mentors. While insights were collaboratively developed, errors or omissions are a failing of the lead author alone (herself a Settler of mixed-European decent). To decolonize research approaches, this work centers Indigenous analysis frameworks, avoids technical jargon, prioritizes visuals, and nurtures relevance and reciprocity through iterative participatory engagement with SSIGA and SSIGA member Nation staff. To safeguard Indigenous Knowledge sovereignty, only this Executive Summary and its inclusions are publicly shared.

Key Findings (Report sections mirror objectives and are summarized at high-level below.)

FAILURES & LEVERAGE POINTS | Failures of currently-dominant approaches to cumulative effects assessment and management in so-called BC (and Canada more broadly) span disciplines, fields and professional practices – including land use planning, resource management, infrastructure development, and the impact assessments and cost benefit analyses used to inform them. The BC Supreme Court's ruling in *Yahey v BC* (2021) confirmed that these failings



implicate *all* sectors, *all* decision-making tiers and *all* government Ministries/Departments involved¹⁴; underscoring what Indigenous communities have long known: that failings are “systemic”¹⁵, “profound”¹⁶ and require urgent, systemic transformation. It is important to highlight the fact, affirmed by wide and growing consensus across science disciplines, that environmental, social and economic “values” (through which cumulative effects are measured) are *subjective*; and as such, are inextricably shaped by the worldview (i.e. ways of knowing, being, doing, valuing) of those assessing and managing them¹⁷. Currently-dominant approaches, characterized by Euro-centric Science paradigms, Colonial power structures, Christianity-rooted supremacist ideologies, and Neoliberal economic systems (e.g. narrow, compartmentalized framings; mechanistic logics; dissociative approaches; externalizing, zero-sum valuations; towards one-size-fits-all ‘solutions’ that inherently disrespect and devalue distinct legal orders and cultural practices of Indigenous Nations) require transformations across institutional *and* individual levels – beyond technical /administrative methods, metrics and legislative clauses, to deeper underlying values, mental models, and worldviews underpinning them and balance of power between them (details below).

INDIGENOUS KNOWLEDGES & LEADERSHIP | Analysis using Indigenous-centric frameworks¹⁸ lays bare that ways of knowing, being, doing and valuing are inextricably interrelated – animated through interwoven legal orders, language, stories and practices, all reciprocally rooted in relationships with land, water and other more-than-human relations. This more sophisticated understanding makes clear that the degradation of interdependent living systems not only violates the inherent Rights and responsibilities of Indigenous Peoples (and their more-than-human relatives), but also desecrates inherent natural legal orders – with detrimental impacts on the health of all they sustain (whether those involved recognize this or not).

Indigenous-centric frameworks¹⁹ from over 20 Nations/groups were reviewed but represent a small fraction of inspiring examples within a field of growing resurgence. Valuable learnings reside both in the enriching diversity of approaches and shared overarching tenets – including:

- ways of knowing, being, doing and valuing are holistic, relational, reciprocal, respectful, responsible, focused on **empowering seven-generations well-being** and **self-determination**;
- each Nation/community defines key terms of reference (e.g. well-being, values, etc.) through their distinct, language, laws, practices, etc. **Translating** between Knowledge Systems, and “*re-story-ing*”²⁰ worldviews, are critically important to CEAM frameworks;
- Free, Prior and Informed **Consent (FPIC)-based jurisdiction / co-governance**, with collaboratively aligned goals and values that embed their unique legal orders, language and practices;
- are **land-based**, **strengths-based**, trauma-informed, **inclusively community-centric** (i.e. community-mandated) throughout—key roles for Elders, Knowledge Keepers / Holders, youth, women, 2spirit, more-than-human relatives, etc.);
- understanding that cumulative effects are **about relationships** (not “components”) and as such require investing in **reciprocal collaboration** per the above principles.



KEY RECOMMENDATIONS & CONCLUSIONS | Needed transformations **require key shifts in core terms of reference** – e.g. shifts regarding core objectives, principles, scopes, boundaries, thresholds, indicators, etc.; as well as **key shifts in practices** for implementing them – e.g. in how data is gathered, how significance is determined, and how decisions are ultimately made and upheld. Foundationally, this necessitates **critical shifts in purpose, principles, practices and power across institutional AND individual levels.**

Beyond cumulative effects assessment and management, an effective Indigenous-centric framework requires embedding governance – i.e. empowered ways of upholding Indigenous laws and inherent jurisdiction. Give the complexities of overlapping jurisdictions with Crown governments, this often means **shared decision-making** – i.e. **co-management** and more deeply, **consent-based jurisdiction** and **co-governance**. Recent legislation related to the implementation of UNDRIP (DRIPA, 2019; DRIPA Action Plan, 2021; the federal UNDRIP Act, 2022) provide legal frameworks for actualizing these approaches. Further, effective governance of cumulative effects can be understood as essential to being able to successfully implement UNDRIP and related Crown commitments. **Key transformations to support implementation** include:

- **re-aligning purpose** around intergenerational (seven generations) well-being and mutual flourishing (meanings and indicators to be defined by Indigenous Governments involved);
- **recognizing and respecting the distinct laws and protocols** of the **Indigenous Governments** involved – as understood through the lens of their language, stories and cultural practices;
- **revitalizing language, laws, stories and cultural practices** to support the above;
- **re-establishing how significance is determined** in accordance with the above – i.e. rescoping spatial and temporal boundaries, baselines, thresholds, and indicators;
- **(re)developing adaptive management regimes** to embody the above – including triggers, actions, monitoring, enforcement, continual un/learning and reciprocal development;
- **re-conceptualizing best wise practices, adapting/redesigning techniques** to embody them;
- **removing barriers to access** and degenerative constraints of technical jargon and the English language (and Eurocentric mental models) more broadly;
- and **recognizing that values are inherently subjective and must be understood holistically** (i.e. not via currently-dominant fragmented, externalizing and dissociative approaches prioritizing quantitative ways of knowing and their monetization)

A list **key shifts** summarized by theme – power, purpose, principles and process/practices, underpinning assumptions – is included in Table 1. A list of specific actions recommended for key actors – Settler-Colonial governments (as institutions); Settler-Colonial practitioners (e.g. consultants, proponents, government staff as individuals); and Indigenous Governments and their communities – is included in Appendix A. And recommended areas for further research and development are outlined in Appendix B.



Table 1: Key Shifts Required to Empower an Indigenous-Centric Cumulative Effects Framework

ROOTS	Settler-Colonialism, Eurocentric Science, Neoliberal Economics (anthropocentric, racist, patriarchal; dissociative; selfist; degenerative)	Indigenous ways of knowing, being, doing & valuing (holistic, relational, reciprocal, responsibility for collective wellbeing of all relations)
assumptions / motivations	commodification of assets (property rights > all else) "legal" property rights (source: immoral, illegitimate Doctrine of Discovery) scarcity, fear, dominance, greed	caring for relations (responsibilities > rights) reciprocal responsibilities (on which Settler sharing "privileges" are contingent)
PURPOSE	from mitigating fragmented harms	abundance, humility, gratitude, reciprocity to empower holistic healing (mutual flourishing*)
PRINCIPLES & PROCESS	from "cultural interests / values"	to Indigenous laws
language*	from "components"	to relationships
	from "biological" and "cultural indicators"	to Elders, relatives, kin and sacred relations, legal orders
	from "mythical beings" and "legends"	to Sacred / Supernatural Beings, Elders and legal principles
boundaries	from project-scales; project lifespans (political/fiscal)	to watershed scales and nested lifesheds; 7 generation lifecycles (existential for living systems)
baselines	from degraded/ing "shifted" baselines	to pre-colonial baselines AND 7 generations thriving (i.e. true reconciliation)
indicators / metrics	from measurable, mappable & commodified (i.e. quantitative ecological, \$ only)	to meaningful, holistic & relationally accountable (qualitative – e.g. health & well-being, self-determination & governance; greed as stressor;...)
POWER	from unilateral State control	to Indigenous self-determination + (co)governance (now law per UNDIRP)
CE FRAMEWORK	assessment & management (reactive reduction of harms / risks)	to planning, revaluation, re-story-ation* , accountable co-governance (proactive co-creation of reciprocal value)

Image: collage by author

*Kimmerer, 2013.



APPENDIX A - Recommendations for Key Actors

SETTLER-COLONIAL GOVERNMENTS

(1) Legal Recognition and Decolonizing:

- a) meaningfully recognizing and delivering on commitments made in DRIPA, UNDRIPA and other relevant legislation, policies and promises, including: consent-based decision-making/co-governance agreements²¹; legal recognition of IPCAs²²; legal recognition of Indigenous-led assessment and planning²³; an overarching law to prioritize ecosystem health across all sectors and Ministries²⁴; clear legal requirements and implementation tools regarding regional assessment, land use planning and coastal marine planning²⁵.
- b) among the above, recognition of the inalienable Rights and inherent jurisdiction of Indigenous Peoples (per Section 35 of the Canadian Constitution Act, 1982, AND per their distinct Indigenous legal systems); and “necessary space to strengthen application of [their distinct] laws and legal orders in various areas not adequately addressed through the Canadian legal system”²⁶.
- c) individual and institutional investments in the cultural awareness and transformative un/learning required to recognize (i.e. to understand) what this *actually* means and how to *meaningfully* implement and embody it – via transforming behaviours, policies, legislation, values and worldviews (i.e. **decolonizing**); and in respectful, reciprocal on-going relationship with Indigenous Peoples on their terms (i.e. **reconciling**)

(2) Robust Reconciliation / Reconciling:

- a) investing in ongoing respectful and reciprocal relationships to enable the above, built on mutual respect, trust and good conduct *not* a static checkbox (true for 1a above also).
- b) economic reconciliation – not just regarding returns on current and future proposed investments, but compensation for cumulative damages, regenerative potentials and repatriation – understood in ways that meaningfully recognize and respect Indigenous Laws, values, meanings (e.g. well-being, time horizons, etc.)

NON-INDIGENOUS PRACTITIONERS (consultants, proponents, government staff, etc.):

Refer to above – especially 1 (b)(c) and 2(a)(b)

INDIGENOUS GOVERNMENTS / NATIONS / COMMUNITIES / ORGANIZATIONS:

Resurgence / Resurging: continuing to assert self-determination and strengthen inherent jurisdiction through distinct Laws and cultural practices (more detailed listing provided in the confidential report).



APPENDIX B – Recommended Areas for Further Research

1. DRIPA and UNDRIPA are broadly recognized as holding transformative potential but implementation and settler-colonial understandings are still in their infancy. A preliminary mapping of the potentials of UNDRIP Articles and DRIPA commitments has been started but requires deeper development.
2. Currently-dominant approaches to CEAM are derived from Environmental Assessment but many other frameworks exist (e.g. Health Impact Assessment, Social Impact Assessment, Cultural Impact Assessment, Integrated Assessment, etc.). An integrative review of these frameworks may reveal additional insights.
3. Critical integrative analysis of existing policies, guidance documents and research published to support the implementation of existing cumulative impact related legislation, through the lens of Indigenous-centric frameworks and learnings from items 1 and 2 above – to highlight generative and degenerative elements. Supporting documents include:
 - [Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) (regarding the IAA);
 - [Considering Environmental Obligations & Commitments in Respect of Climate Change under IAA](#);
 - [Strategic Assessment of Climate Change](#) (regarding the IAA);
 - [Analyzing Health, Social & Economic Effects under IAA](#);
 - the full suite of reports published through the Impact Assessment Agency of Canada’s “[Knowledge Synthesis](#)” program to “[Inform best practices in environmental & impact assessments](#)”;
 - and (in direct relation to item 1 above) the 2022 [DRIPA Action Plan](#).
4. Precedents are powerful for shifting conceptions of what is possible. Strategically expanding on the “spotlights” (included in the confidential report) could help further support needed transformation.
5. The report includes list of potentially synergistic efforts/organizations. Given the vital importance of reciprocal collaboration, this list merits further/ongoing development and subsequent development of reciprocal relationships. If you think your efforts might have reciprocal synergies, contact SSIGA at <https://www.ssig.ca/contact-us>.
6. Further inquiry into supportive emerging legal frameworks/instruments – e.g. legal personhood for rivers and other more-than-human relatives²⁷; Indigenous Protected and Conserved Areas (IPCAs)²⁸.



¹ [Canadian Environmental Assessment Agency, Expert Panel for the Review of Environmental Assessment Processes, 2017](#); [Mascher, S., 2019](#); [Morales, S., 2019](#); [Hamilton, R., 2019](#); [Gibson, R.B., et. al., 2020](#); [Scott, D.N. & Atlin, C., et. al., 2020](#); [Muir, B., 2021](#); [Smith, G. & Jones, J., 2021](#); et. al. It is important to note that these experts include both Indigenous staff and Western/Euro-centric scholars – some via participatory research Indigenous communities, and specifically research efforts funded by the Canadian Impact Assessment Agency (IAAC) through its 2019-20 “[knowledge synthesis” grant program focused on “informing best practices in environmental and impact assessments”](#) and building on the findings of the Expert Panel it convened in 2016-17.

² Tsawwassen First Nation has signed a Modern Treaty with the British Columbia Crown; but this colonial-centric instrument is not a ceding of their inherent jurisdiction or responsibilities and must be understood through the lens of Tsawwassen laws as communicated in *their* Declaration: https://tsawwassenfirstnation.com/wp-content/uploads/2019/07/Declaration_of_Tsawwassen_Identity_and_Nationhood.pdf

³ EPA, 2020. <https://www.epa.gov/salish-sea/executive-summary-health-salish-sea-report>

⁴ StatsCan. Retrieved Sept 9, 2022 from: <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1710000901>

⁵ Martin, T., et. al., 2020. Retrieved July 2022 from:). <https://news.ubc.ca/2020/11/26/its-not-too-late-to-save-102-species-at-risk-of-extinction/>

⁶ Kimmerer, R.W. 2013; Simpson, L.B.S., 2017; Maracle, L., 2015; et. al.

⁷ IPCC, 2022; Guterres, A., 2022; IPBES, 2019; Government of Canada website, retrieved August 2022: <https://www.canada.ca/en/environment-climate-change/services/nature-legacy/indigenous-leadership-funding.html>; et al.

⁸ [United Nations Declaration on the Rights of Indigenous Peoples \(UN, 2007\)](#), often referred to in Canadian legislation as “the Declaration”. DRIPA (2019) requires that the BC government: “In consultation and cooperation with the Indigenous peoples in British Columbia take *all measures necessary* to ensure the laws of [the province] are consistent with UNDRIP” (section 3, emphasis added). The federal corollary (UNDRIPA) was brought into force June 21, 2021 and includes the same text, almost *verbatim*, asserting that the federal government “*must*, in consultation and cooperation with Indigenous peoples, *take all measures necessary* to ensure that the laws of Canada are consistent with the Declaration” (section 5, emphasis added).

⁹ Sharing requires the consent of respective Indigenous authors / communities / Nations, abidance of any other laws / principles / protocols as they may require.

¹⁰ Through [UBC’s Sustainability Scholar’s program](#)

¹¹ Including cumulative effects frameworks, and their implication via other planning / assessment / capacity-building instruments e.g. land use planning, independent assessment / monitoring / management regimes, etc.

¹² Including previously-recorded (confidentially-coded) interviews with SSIGA member nation Knowledge Holders and Knowledge Keepers.

¹³ From PGL Environmental and Landmark Resource Management Ltd.

¹⁴ [Muir, B., 2021](#); et al.

¹⁵ Ibid: p11.

¹⁶ [Smith, G. & Jones, J., 2021](#).

¹⁷ Haila, Y., 1997; Berkes, F., 2010; Levine, P., 2021; et. al.

¹⁸ [Castellano, M.B., 2005](#); [Wilson, S., 2008](#); [Reid, A., 2020](#); et al.

¹⁹ This includes other instruments for consent-based jurisdiction – e.g. water laws, land use plans, sustainability tests, independent assessment frameworks, Indigenous Protected / Conserved areas (IPCAs)

²⁰ A protmanteau shared by Potawatami Botanist Robin Wall Kimmerer (2013) – explicitly building on ideas of Gary Nabhan – to underscore the inextricable interdependence between the transformation of the stories (worldviews and mental models) that underpin environmental management efforts and capacities for ecological (and interwoven social) restoration.

²¹ [DRIPA, 2019](#): section 7.

²² Government of Canada website, retrieved August 2022: <https://www.canada.ca/en/environment-climate-change/services/nature-legacy/indigenous-leadership-funding.html>

²³ As detailed by West Coast Environmental Law ([Smith & Jones, 2021](#): p12): “The Province **promised** to recognize Indigenous-led assessments during its process to revitalize environmental assessment in BC, and has also **committed** to partner with Indigenous governments in modernizing land use planning. Indigenous nations such as the Gitanyow are **leading the way** in developing Indigenous-led assessment and planning regimes that address



cumulative effects and care for their territory in its entirety. Indigenous-led assessment and planning regimes may be recognized by the Province through *DRIPA* agreements, as well as agreements under section 41 of the provincial *Environmental Assessment Act* or through other appropriate government-to-government arrangements.”

²⁴ BC Premier’s platform commitment to implement the full slate of proposals and recommendations from the [Old Growth Strategic Review \(2020\)](#). Retrieved from NDP website August, 2022: <https://www.bcndp.ca/latest/new-approach-old-forests?fbclid=IwAR3dOpYexG4R5EqZw0JORS6lr9TDTvtyE8iZv92y2icJbpJhSrUtQDws554>

²⁵ Per [2020 BC Mandate Letter to the Minister of State for Lands and Natural Resource Operations](#) (now MoLWRS).

²⁶ [DRIPA Action Plan, 2022](#): p10.

²⁷ A legal concept in which a human or non-human entity that is recognized as having the rights and duties of a person as defined for (limited) legal purposes. Important cases for the legal personhood of Rivers includes: the Whanganui River in Aotearoa (Colonial New Zealand), asserted in 2017 – the first in the world – based on Māori legal tradition that recognizes humans and nature as kin; and the Muteshekau Shipu river in so-called Canada in June 2021. Important to note efforts underway to seek this status for Fraser River, championed by the Raincoast Conservation Foundation (2022 report available here: https://sustain.ubc.ca/sites/default/files/2022-046_Exploring%20Opportunities%20to%20Accord%20the%20Fraser%20River%20Legal%20Status_Pasternak.pdf).

²⁸ Indigenous Protected / Conserved Areas.

