



General Environmental Management Plan Guideline

VERSION 2.0: February 2025

About the Regulator

The B.C. Energy Regulator (Regulator) is the single-window regulatory agency with responsibilities for regulating energy resource activities in British Columbia, including exploration, development, pipeline transportation and reclamation. The purpose of the Regulator is to regulate energy resource activities in a manner that protects public safety and the environment, supports reconciliation with Indigenous peoples and the transition to low-carbon energy, conserves energy resources and fosters a sound economy and social well-being.



The Regulator’s core roles include reviewing and assessing applications for industry activity, consulting with First Nations, ensuring industry complies with provincial legislation and cooperating with partner agencies. The public interest is protected by ensuring public safety, protecting the environment, conserving petroleum resources and ensuring equitable participation in production.

Vision, Mission and Values

Vision

A resilient energy future where B.C.’s energy resource activities are safe, environmentally leading and socially responsible.

Mission

We regulate the life cycle of energy resource activities in B.C., from site planning to restoration, ensuring activities are undertaken in a manner that:



Protects public safety and the environment



Supports reconciliation with Indigenous peoples and the transition to low-carbon energy



Conserves energy resources



Fosters a sound economy and social well-being



Values

Respect is our commitment to listen, accept and value diverse perspectives.

Integrity is our commitment to the principles of fairness, trust and accountability.

Transparency is our commitment to be open and provide clear information on decisions, operations and actions.

Innovation is our commitment to learn, adapt, act and grow.

Responsiveness is our commitment to listening and timely and meaningful action.

Manual Revisions

The Regulator is committed to the continuous improvement of its documentation. Revisions to the documentation are highlighted in this section and are posted to the [Energy Professionals](#) section of the Regulator's website. Stakeholders are invited to provide input or feedback on Regulator documentation to servicedesk@bc-er.ca or submit feedback using the [feedback form](#).

Version Number	Posted Date	Effective Date	Chapter	Summary of Revision(s)
1.0	Feb. 19, 2025	Feb. 19, 2025	All	This is a new document; users are encouraged to review in full.
2.0	Feb. 27, 2025	Feb. 27, 2025	Figure 1	Text changes to Figure 1 to align with subsequent bullets.

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Preface

About

The General Environmental Management Plan (EMP) Guideline is a reference document for energy resource activity proponents undertaking activities in certain landscape management plan areas (for example the HV1-C Gundy Complex Plan Area). The guideline is intended to assist energy resource companies and those potentially affected by energy resource activities to understand the review process and minimum requirements for General EMPs, where required by a landscape management plan.

The guideline has been prepared to be as comprehensive as possible; however, it is not all encompassing and may not cover all situations. Where circumstances or scenarios arise that are not covered by this guideline, contact Regulator staff for clarification and assistance.

This document will continue to be updated to support the spirit and intent of government's commitment to moving towards broader cumulative effects management that balances responsible resource development with the practice of treaty rights and environmental values.

Guideline Scope

This guideline is limited in scope to the Regulator's application processes, and the authorities and requirements established within *Energy Resource Activities Act* (ERAA), or specified enactments established thereunder. Carrying out energy resource related activities may require additional approvals from other regulators or create obligations under other statutes. It is the permit holder's responsibility to know and uphold all their legal obligations.

A General EMP describes the best management practices that will be implemented and how the proponent will consider and apply the mitigation hierarchy to minimize impacts to values specified in the accompanying landscape management plan when planning development activities in that plan area.

Additional Guidance

As with all Regulator documents, this guidance does not take the place of applicable legislation. Readers are encouraged to become familiar with the acts and regulations and seek direction from Regulator staff for clarification.

Chapter 1: General Environmental Management Plan

1.1 Introduction

In certain landscape management plan areas energy resource activity proponents must prepare a General Environmental Management Plan (EMP). General EMP's are submitted independent of permit applications. The intent of the General EMP is for the proponent to demonstrate forethought in how environmental impacts, within and beyond the physical footprint, have been considered during project planning in landscape management plan areas. A General EMP may generally be used for activities that are routine in nature and have a low likelihood of impacting values or have proven techniques to minimize those impacts.

It is expected that the General EMP will describe how the proponent will consider and/or has historically considered the impact of development activities during project planning (e.g., through design and project siting) and future activities (e.g., construction, operations and restoration) in the landscape management plan area. It should further describe the typical best management practices the proponent employs and how those will be used to avoid or minimize the expected impacts. This information should assist in informing how the proponent plans to achieve the requirements outlined in the associated landscape management plan, and where appropriate, identify what activities may require site-specific mitigation.

The General EMP is reviewed by the Regulator for consistency with the requirements outlined in the associated landscape management plan. Once the Regulator has reviewed and believes the requirements are addressed it is subsequently reviewed by First Nations. The reviewed General EMP will be kept on file with the Regulator and used for applications within the specified landscape management planning area.

Where a condition for development cannot be met through the measures outlined in the General EMP, and a Site-Specific Mitigation Strategy is proposed, a clear threshold and commitment to provide the extra mitigation measures is required. The Regulator will require an application to supplement the General EMP with a Site-Specific Mitigation Strategy. Mitigation strategies outlined in the Site-Specific Mitigation Strategy are meant to describe what measures will be used to minimize the impacts of the activity that cannot be minimized by the measures outlined in the General EMP.

1.2 Permits and Authorizations

Permits and authorizations may contain project specific conditions referencing the General EMP, such as requirements for monitoring, reporting and record keeping, informed by the General EMP. These conditions may include requirements to provide details of measures to minimize impacts, corrective actions or contingency measures that were followed if measures to minimize did not function as described.

1.3 Considerations

Landscape management plans are intended to align with, but not replace, requirements that may be outlined in the Consensus Document signed by four Treaty 8 First Nations and the Province, BRFN Implementation Agreement, and the Treaty 8 Planning and Mitigation Regulation. These landscape management plans have been developed to support and operationalize many of the goals and objectives that are part of the Province's commitments made through these agreements. In some situations, landscape management planning areas may overlap another planning area, where a requirement is more prescriptive, proponents must plan their development in accordance with the more prescriptive requirement.

Landscape management plans do not replace existing guidelines (such as the [Environmental Protection and Management Guideline](#)) but adds to and supplements those already in effect. Proponents and their contractors should become familiar with the applicable acts and regulations and seek direction from the Regulator staff for clarification where necessary.

Chapter 2: Submission, Review and Revision Process

2.1 Submission and Review Process

General EMP's are submitted in advance and independent of permit applications. After submission, the General EMP will be reviewed for consistency with the relevant landscape management plan by the Regulator. The review process is described in Figure 1 and below. The timelines described below are intended to support planning but are not definitive.

Coordination of revisions and/or updates to the General EMP will follow the same process. For minor edits, use track changes (or a different colour text) to identify new or revised text and summarize the changes to the General EMP and rationale for the revision in an email.

Figure 1: General EMP Review Process



- **Submission:** Prior to submitting permit applications, the General EMP should be submitted by the proponent to the Regulator using the email: sensitiveplanningareas@bc-er.ca.
- **Consistency Review:** The Regulator will review the General EMP for consistency with the requirements outlined in the relevant landscape management plan. The Regulator aims to complete within three-weeks of receiving the submission. If there are concerns or comments, the Regulator will communicate with the proponent. Review will not advance to First Nations until the Regulator's comments and/or concerns have been addressed.
- **First Nation Review:** Once the General EMP is reviewed by the Regulator and the comments are addressed by the proponent, the Regulator will coordinate with First Nations for review. The Regulator will request that First Nations complete their review within three-weeks of sharing. Comments received from First Nations will be communicated to the proponent by the Regulator. The General EMP will not be filed until both the First Nations and Regulator's comments and/or concerns have been addressed.
- **Filing:** After comments received by First Nations and the Regulator have been addressed, the General EMP will be kept on record with the Regulator to support future applications in the landscape management plan area. Confirmation of filing will be provided via email.

Chapter 3: Preparation and Guidance

3.1 Consistency with Landscape Management Plans

The landscape management plans outline the requirements under which energy resource activities may be carried out within the plan area(s). These conditions are additive to existing requirements and are intended to supplement existing rules and regulations. Appendix A provides an example concordance table which must be used to indicate where the requirements have been described in the General EMP. Where the conditions cannot be met or it is not relevant, a rationale must be provided in the General EMP and referenced in the concordance table.

3.2 Layout and Commitments

It is expected that the layout of the General EMP will vary between proponents as it is intended to follow company formatting, style guides, and standard operational or best management practices. The General EMP is intended to be an operational document that describes the measures required during both construction and operation to minimize impacts to the values. It is recommended that the General EMP uses headings, labels and language from the relevant landscape management plan(s) and use the concordance table format (see Section 3.1 and Appendix A) to outline where in the General EMP the condition for development is described.

Where a condition for development cannot be met through the measures outlined in the General EMP, and a Site-Specific Mitigation Strategy is proposed, a clear threshold and commitment to provide the extra mitigation measures is required. Below is an example for metal leaching and acid rock drainage management:

“If significant bedrock will be disturbed during lease construction activities, a qualified professional will be retained to complete sampling and testing of these materials. The qualified professional will prepare a Site-Specific Mitigation Strategy that will describe classification, handling and mitigation measures.”

The [Environmental Protection and Management Guideline](#) provides clarification for qualified professionals including content and format requirements for mitigation plans submitted to the Regulator. This guideline also includes templates to describe mitigation measures that are concise measurable commitments to minimize impacts to values.

3.3 Key Contact and Sign Off Requirements

3.3.1 Proponent Representative and Commitment

The General EMP must include a key contact from the proponent should questions related to the General EMP arise. This should include the representative's name, proponent name, phone number, and email. If the proponent

representative changes, please share the new contact information with the Regulator by emailing sensitiveplanningareas@bc-er.ca.

3.3.2 Qualified Professional Sign Off

The sign off requirements for the General EMP align with the Province of British Columbia’s professional reliance model used in relation to resource management and environmental protection in B.C. Table 1 below must be included with the General EMP to demonstrate that each component of the General EMP has been completed by a qualified professional from one of the professional associations regulated under the *Professional Governance Act*.

Table 1: Credentials, Experience and Sign-off.

Personnel, Credentials, Registration Number and Discipline	Years Experience specific to the discipline	Signature
e.g., Joanna Smith, M.Sc., R.P.Bio (1478) – Moose and Moose Habitat	e.g., Eight years of experience related to wildlife assessment, including more than 5 years working with proponents in the oil and gas sector.	Add signature
Personnel 2 etc.		

3.4 Contact and support

If a proponent is unclear if the planning and mitigation measures apply to their project, contact the Regulator at sensitiveplanningareas@bc-er.ca.

Appendix A: Example Concordance Table

Table A.1 below provides an example concordance table format using the conditions for development outlined in Section 7.5.1.a of the [HV1C Gundy Complex Plan](#).

Table A.1: Example General EMP Concordance Table Format

ID	Condition for Development	Section number <i>(incl. subsection or table number, if relevant)</i> <i>If excluded, point to section where a rationale is provided.</i>
1	Demonstrate how development activities will be designed to minimize or avoid impacts to Values. This includes:	
1A	a) Process and best management practices used for project siting, including:	
1A.i	i) A description of the considerations that will influence how and where activities are situated.	Section 5.5.1; Table 6
1A.ii	ii) A description of the process followed, and any QP guidance considered, in evaluating the feasibility of using existing SLU or consolidating with any other existing disturbance.	Section 4.3
1A.iii	iii) Where Oil and Gas activities are proposed in a CIMZ, considerations for minimizing timing, duration and impact of activities and supporting eventual wind down, as applicable.	Excluded, rationale provided Section 3.1
1A.iv	iv) When it is not possible to use existing SLU or consolidate with any other existing disturbance, describing what process proponents will undertake to confirm with QP guidance why it is not possible.	Section 6.0