

ENVIRONMENTAL PROCESS
MODERNIZATION PLAN (EPMP)
IMPLEMENTATION PROJECT
PACIFIC REGION

PHASE 1 DIAGNOSTIC

FISHERIES AND OCEANS
HABITAT MANAGEMENT PROGRAM

AUGUST 2007

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1.0 INTRODUCTION

Fisheries and Oceans Canada (DFO) launched the Environmental Process Modernization Plan (EPMP) in 2004. It provides a framework for delivery of the Habitat Management Program (HMP) in a manner which conserves and protects fish habitat effectively and efficiently, with transparent and predictable decision-making, and which is integrated with the priorities of governments and stakeholders.

Implementation of the EPMP in Pacific Region is underway. The initial implementation plan (Fiscal Years 2004/2005 to 2006/2007) focused on national priorities related to the first five elements of EPMP (Risk Management Framework, Streamlining Regulatory Reviews, Coherence, new Management Model for Major Projects, Enhanced Partnering) and on the sixth element (Habitat Compliance Modernization) during the third year. This implementation plan has expired. A new regional plan is required to support efforts to continuously improve delivery of the HMP in Pacific Region. It will be developed using a four-phased approach:

- Phase 1: Diagnostic
- Phase 2: Developing the Plan
- Phase 3: Implementing the Plan
- Phase 4: Evaluation and Adjusting

The purpose of the Phase 1 Diagnostic is to review how successful EPMP implementation has been to date, understand staff perspectives on implementation gaps and opportunities to strengthen implementation and identify lessons learned from the initial implementation phase. Results of the Diagnostic will be used to develop the new regional implementation plan for Pacific Region. This report documents the methodology and results of the Phase 1 Diagnostic.

2.0 METHODOLOGY

A four-part internal staff engagement process was conducted in eight separate focus group meetings targeting habitat practitioners (one session for each of the five Area offices and one for Regional Headquarters staff), Habitat Managers, Conservation and Protection (C&P) Chiefs, and Area Directors/Regional Director, Oceans, Habitat and Enhancement Branch (OHEB).

Part 1: Case for Action Discussion

The following questions were used to stimulate a discussion regarding the case for action or rationale for launching the EPMP:

- What are the forces driving change in the HMP?
- The EPMP is comprised of six elements. What are they designed to accomplish?

Part 2: Impact of Change Assessment

An Impact of Change Assessment was completed to measure the amount of impact that EPMP will have or has had on individuals and teams within the HMP (Appendix 1). Practitioners completed the assessment once and Habitat Managers and C&P Chiefs

completed the assessment twice, once for themselves as managers and a second time from the perspective of a member of their team (i.e., the average response of their staff). Participants discussed their impact scores and top three impact factors.

Part 3: Losses and Opportunities

Participants identified losses and opportunities associated with EPMP at the program and personal level.

Part 4: Commitment Assessment

The concept of the commitment and the five levels of commitment were explained (see Appendix 2). Participants were asked to record their commitment level and identify any barriers to acceptance and barriers to action.

Losses and Opportunities and the Commitment Assessment were not completed in the session with C&P chiefs because the most relevant EPMP element to this Sector (i.e., Habitat Compliance Modernization) has not been implemented yet in Pacific Region.

Other sources of information from internal sources were reviewed, as follows:

- National EPMP Stakeholder Survey – Internal Results – Spring 2006
- EPMP Question and Answer period, all staff OHEB meeting – November 2006

The following sources of information from external sources were reviewed:

- National EPMP Stakeholder Survey – External Results – Spring 2006
- Regional ENGO EPMP Information Sessions – Spring 2006
- Departmental Consultations on EPMP – Fall 2006
- Regional DFO-NRIA Workshop – February 2007
- Regional ENGO Workshop on EPMP – March 2007

3.0 RESULTS

3.1 INTERNAL

1. Staff Engagement Process

⇒ Case for Action Discussion

The Case for Action discussion indicated a high level of awareness of the six elements of EPMP. There was an incomplete understanding of the driving forces for change in the HMP and the objectives or intent of EPMP.

Driving Forces for Change

The driving forces for change in the HMP are increased demand for greater predictability,

coherence, certainty and timeliness in decision-making, improved cooperation and coordination with other federal departments, provincial/territorial agencies and stakeholders, and more effective conservation and protection of fish habitat. Other driving forces include public concerns about the decline/loss of fish habitat, increased complexity of environmental assessments for major projects, and the rise in economic development and high volume of projects referred for regulatory reviews. These drivers, combined with the need to focus limited resources on areas of highest risk, lead to the development of the EPMP.

The main driving forces for change were identified during the case for action discussion (Table 1). There was little recognition that many of these driving forces originate from the external environment. That is, the needs and demands of external clients and stakeholders of the HMP have changed. EPMP was designed to address these needs arising from the external environment; it did not imply that previous efforts to protect habitat were wrong. There was recognition that DFO is out of sync with the rest of the world in terms of de-regulation, and that others are moving towards self-policing and away from “command and control” approaches.

Objectives

The objectives of EPMP are to make the Habitat Program more effective in the conservation and protection of fish habitat, more efficient, transparent and predictable in delivery of its services, and integrated with the interests and priorities of governments and stakeholders. It is a continuous improvement plan aimed at aligning service delivery consistent with principles of sustainable development and smart regulation. For DFO smart regulation means: responsiveness and efficiency; flexibility (i.e., results-oriented not rules-driven); shared regulatory responsibility among government, citizens, industry and others; effectiveness (e.g., tools and practices in place to achieve policy objectives); and transparency, predictability, and credibility (where the rules of the game are known internally and to users, and are applied consistently).

A wide range of objectives were identified during the discussion (Table 1). The majority of participants did not view “improved habitat protection” as one of the objectives of EPMP. Discussions indicated that there were little or no benefits associated with some of the objectives such as coherence and transparency. There was confusion about whether the No Net Loss principle still applies and several participants indicated that the primary objective of EPMP was to promote economic development. Although the focus of EPMP is providing clear, transparent, coherent and predictable decision-making integrated with the interests of government and stakeholders, it is predominately perceived as lowering the bar on habitat protection and political noise reduction. EPMP was also perceived as justification for reducing program resources, when in reality it is about internal reallocation of resources to the highest priorities (e.g., reallocation from low risk referrals to monitoring).

Table 1. Case for Action Discussion (# represents the number of times the item was raised in a total of 8 sessions)			
Drivers for Change	#	EPMP Objectives	#
Perceived and real inconsistencies in decision-making (e.g., different treatment in different areas)	7	Coherent advice and decisions	6
Workload reduction (can't do it all)	5	Transparency (better understanding of how DFO makes decisions)	5
Modernization or change in way federal government manages (self policing, shift from regulatory to stewardship model)	4	Focus on highest risks; reduce involvement in low risk activities; manage high workloads	5
Shift to sustainable development (enabling role)	4	Reduce effort on referrals and redirect to monitoring	4
Justification for reducing budgets or staff	4	Encourage partnerships and stewardship model and build capacity through partnerships with other groups	4
Need for increased transparency (lack of understanding among stakeholders regarding how decisions are made)	3	Noise reduction (political)	3
Practitioners spending too much time on low risk (shift effort to high risk projects)	3	Premise of EPMP is to promote economic development	3
Timeliness in decision-making too long	3	Reduce staff, lower pay scale	3
Reduce regulatory burden (desire of industry for streamlining)	3	Does the No Net Loss Principle/Net Gain still apply?	3
Economic development pressures	3	Improve credibility/perception of program	2
Program lacked credibility	2	Provide tools to enable staff and developers to better protect habitat	2
Framework required when program expanded into inland provinces	2	Decrease timelines for referrals	2
Reduce redundancy with other governments, share responsibilities	1	Transfer decision-making authority to appropriate level of accountability	1
Political noise reduction and political motivation to revamp program	1	One-window regulatory approach integrated approach	1
Manage mandate creep (provide boundaries around areas of responsibility)	1	Increase habitat protection	1

⇒ Impact of Change Assessment

Impact scores (Figure 1) ranged from low to high (21 to 89). High impact scores indicate a need to invest appropriate time and resources to manage the change initiative and its associated impacts. Low impact scores suggest that less effort is required. The high impact scores recorded indicate that particular aspects of the EPMP need dedicated time and effort to achieve successful implementation.

Managers indicated that there was a higher perceived impact on their staff compared to themselves, presumably because staff have not been exposed to the detailed discussions on EPMP to the same extent as Managers. In addition, some staff may still be doing the same work as their roles have not changed with EPMP. Impact scores were higher for Area staff compared to Regional Headquarters (RHQ) staff, likely because Area staff are in operational roles.

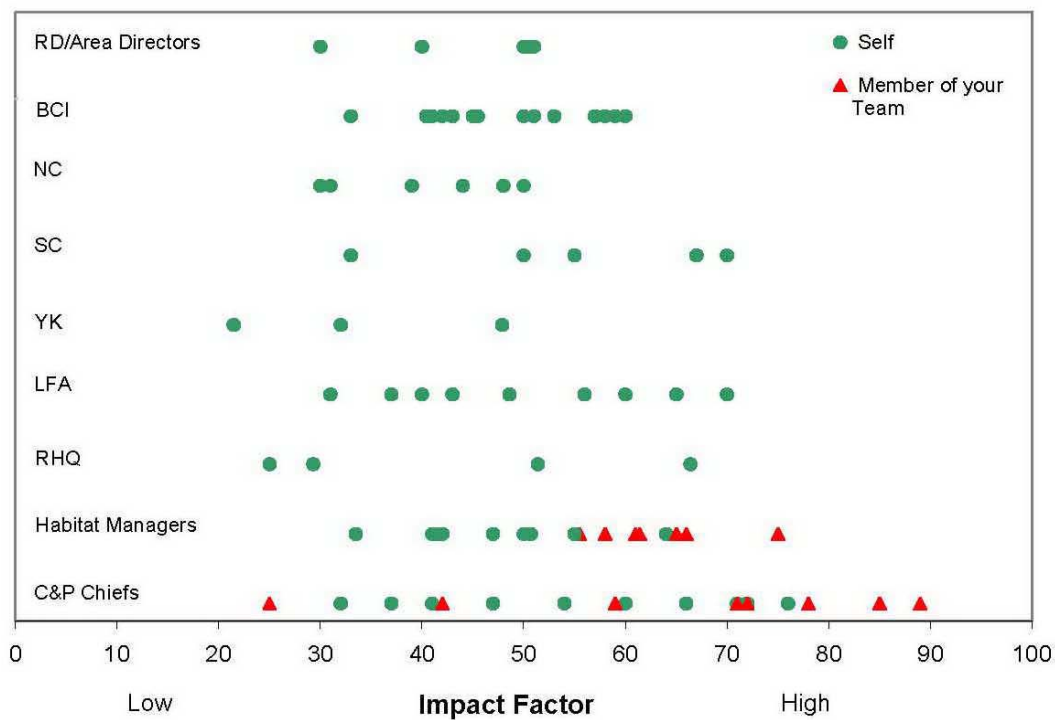


Figure 1. Impact Scores from Impact of Change Assessment

The impact of change assessment examined the impact of EPMP on 14 different factors (Figure 2; see Appendix 1 for a description of the impact factors). The top impact factors were values, emotions, relationships and knowledge.

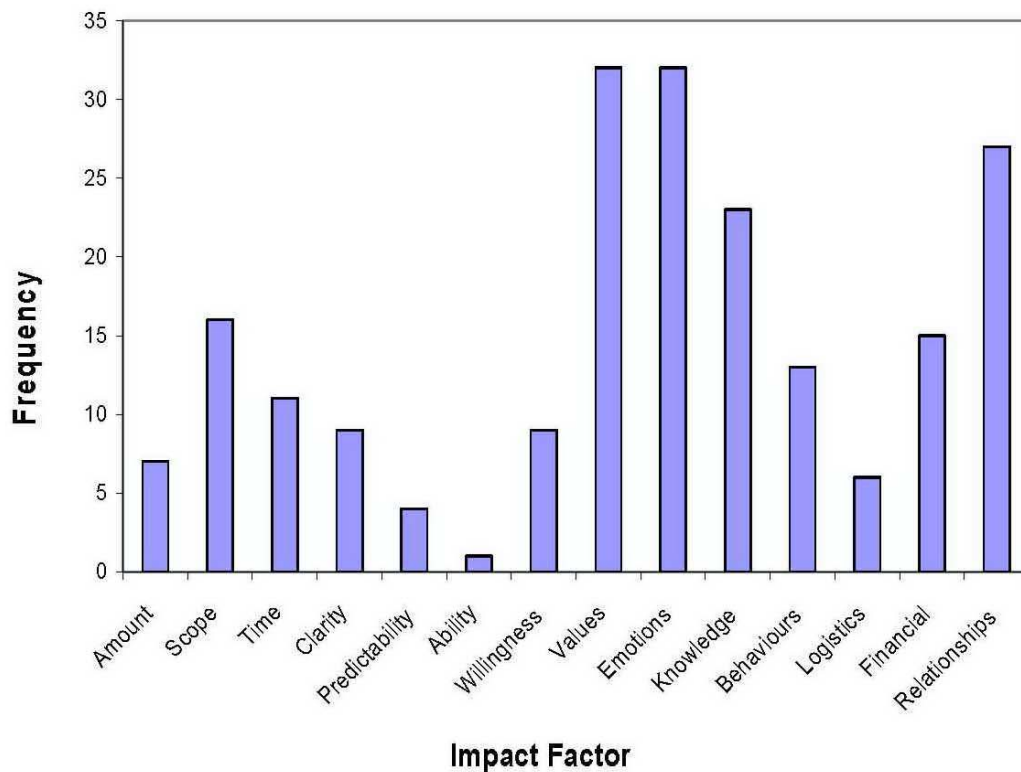


Figure 2. Top Impact Factors from EPMP Implementation

Values: Participants felt that the EPMP requires a significant alteration in their values regarding how business should be conducted. They felt that the Department is allowing significant habitat loss under EPMP and that it is not providing client service to Canadians. They also noted the loss of personal contact with clients, having to accept opinions of other professionals who may be non-neutral, and relying on others in the decision-making process.

Emotions: EPMP requires practitioners and managers to feel differently about the way the HMP operates. Some individuals indicated that they were frustrated as they believe that EPMP caters to industry, does not protect habitat or reduce workload, and ignores the principles of environmental stewardship. Others noted the EPMP is not working to their satisfaction, resulting in lower motivation and job satisfaction.

Relationships: EPMP requires modification to the current methods of influencing others. A key impact was the loss of relationships and contacts due to reduced involvement in low risk activities, and alienating stewardship groups by not providing them with adequate support. Some participants noted that a major impact of EPMP is dealing with staff negatively toward EPMP, which requires greater sensitivity and care when dealing

with people and relationships.

Knowledge: Participants acknowledged that EPMP requires them to view information differently, for example by using the operational statements or risk management framework. They noted that these tools change the definition of a harmful alteration, disruption or destruction of fish habitat (HADD). Staff also acknowledged that they can't process all of the referrals they receive, and hence they must review information differently.

The top impact factors were very similar among the eight different focus group sessions. That is, values, emotions, relationships and knowledge were generally the top impact factors in most sessions. The only exception was that values and emotions were not identified as a top impact factor in the session with the Area Directors and Regional Director, OHEB. The Directors, and in some cases Managers, identified two other key impact factors as financial and clarity. Financial ranked as high impact because the EPMP affects program funding and budgets. Clarity also ranked as high impact because EPMP is expected to provide more clarity and direction with respect to delivering the HMP.

⇒ Losses and Opportunities

Losses and opportunities were identified at the program (Table 2) and personal (Table 3) level. At the program level, the top three losses were habitat, contacts and education, and expertise/experience. The top three opportunities were increased monitoring to evaluate effectiveness and improve habitat protection, delivering a more consistent program, and new tools to assist in project reviews.

At the personal level, the top three losses were loss of job satisfaction and dedication, personal credibility, and ability to use judgement. There were opportunities for doing more interesting work (e.g., less referrals, more effectiveness monitoring), refining the future program direction, and for decreasing workload and stress.

At the program and personal level, losses and opportunities were balanced, meaning that there was approximately equal number of both. It is important to have opportunities, in addition to losses, to increase the likelihood of implementing a change initiative successfully. Further work is required to determine the extent of the perceived losses and how they can be overcome or resolved.

Table 2. Losses and Opportunities at the Program Level

(# represents the number of times the loss or opportunity was raised in 7 sessions)

Losses	#	Opportunities	#
Habitat (e.g., due to slow cumulative losses)	6	More monitoring to evaluate effectiveness and improve habitat protection	7
Contacts, education and leverage associated with small scale projects	6	Deliver a more consistent program	6
Expertise and field experience associated with low risk activities	5	New tools to streamline reviews and staff effort	6
Credibility and trust	5	Workload reduction (explicit means to set manageable workloads)	5
Important relationships	4	Ability to focus on higher risk referrals and priorities	5
Staff morale	4	More effective use of resources	3
Respect for the Department (e.g., DFO not fulfilling its mandate)	2	Tools to shorten the learning curve for new staff	2
Regional independence	2	Gain credibility with both proponents/industry and environmentalists	2
Less rigorous habitat assessments	2	Opportunity to be strategic in developing partnerships, stewardship and planning	2
Confidence	1	Clear, structured decision-making process	1
Regulatory options (enforcement)	1	Tools/vehicle to capture the knowledge base of experienced practitioners	1
Erosion of responsibility and accountability	1	Develop area specific tools (e.g., area operational statements)	1
Ecosystem approach	1	Improve the science base of the risk framework	1
Stewardship	1	Align our business with the national perspective	1
Public support	1	Build a better business case for resources	1
		Engage staff in solutions	1

Table 3. Losses and Opportunities at the Personal Level (# represents the number of times the loss or opportunity was raised in 7 sessions)			
Losses	#	Opportunities	#
Job satisfaction and dedication (e.g., not doing the best job we can)	5	More interesting work (e.g., less referrals, more effectiveness monitoring)	4
Personal credibility (e.g., from colleagues who don't see the value of EPMP or support the Departmental direction)	3	Refine future direction and provide leadership	3
Ability to use judgment	3	Decreased stress (as result of more senior management accountability for decisions)	2
Respect from staff and some partners	2	Reduced workloads (less referrals)	2
Conservation ethic and values	2	New roles, responsibilities and positions	2
Believing that I can make a positive impact	1	Interaction with other Regions to promote consistency	2
Professional integrity (can't comment on certain projects)	1	Training opportunities	2
Fear that positions may be lost once more streamlining tools developed	1	Decreased conflict with proponents on development proposals	2
Confidence in future direction	1	Highlight successes	2
		Increase job satisfaction and professionalism (e.g., by improving effectiveness)	1
		Look for other work opportunities	1
		Partnership building	1

⇒ Commitment Assessment

Participants were distributed at all levels on the commitment curve, ranging from awareness to advocacy (Figure 3). The different symbols represent the different focus group sessions. Some participants commented that the levels were incorrectly ordered and that application and adoption should precede acceptance because they have adopted the change but have not accepted it. Where this discussion occurred, participants were asked to score themselves at the lowest level applicable on the commitment curve.

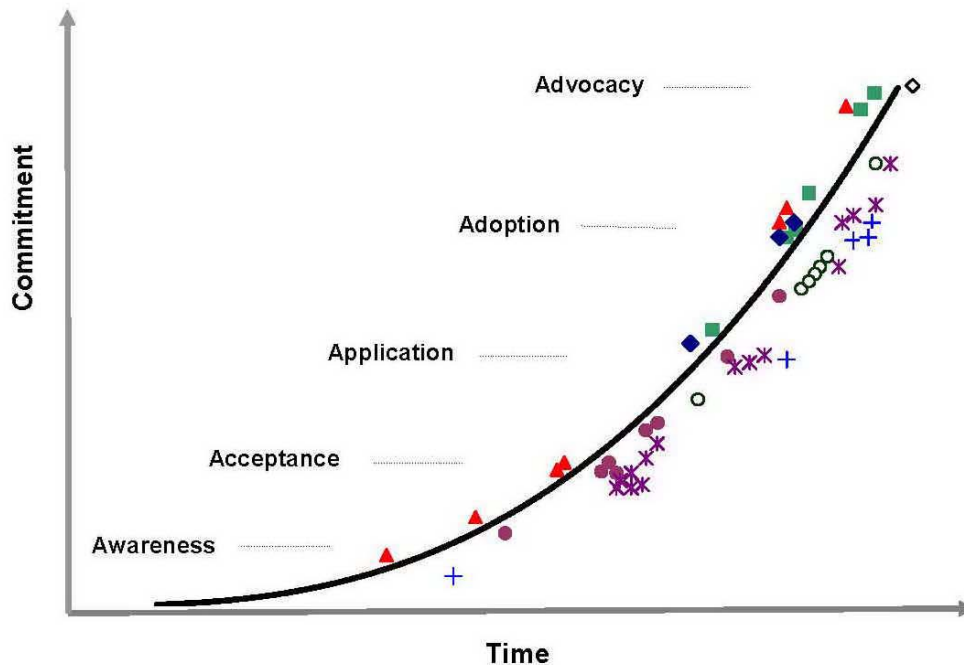


Figure 3. Commitment for EPMP in Pacific Region

While most participants are above the level of acceptance and are applying EPMP, the discussion revealed that there are some significant barriers to both acceptance and taking action (Table 4). The top barriers to acceptance were the lack of success indicators, not seeing the benefits or values of EPMP, personal values that conflict with EPMP, and the perception that EPMP is lowering the bar on habitat protection. Work can be done to overcome some of the barriers to acceptance, such as the lack of meaningful input from staff into the development of EPMP and by providing clarity with respect to the drivers for change and objectives of EPMP. It will be more difficult to overcome some of the barriers to acceptance, such as the personal values conflict and views of underlying political or other motivations.

The main barriers to taking action included the need for better and more relevant tools, including refinement of the risk management framework, clarification with respect to socio-economic issues and sustainable development, and the lack of refinement of decision-support tools. Most of the barriers to taking action can be overcome through technical solutions and policy guidance.

Table 4: Barriers to Acceptance and Action (# represents the number of times the barrier was raised in a total of 7 sessions)			
Barriers to Acceptance	#	Barriers to Action	#
Lack of success indicators (not seeing the benefits or value of EPMP)	7	Need better and more relevant tools to implement EPMP	6
Personal beliefs or values conflict with EPMP or professional values	6	Clarification regarding socio-economic issues (do we assess and if so, how?)	5
EPMP perceived as lowering the bar on habitat protection	5	Lack of refinement of decision-support tools (e.g., risk management framework)	4
Staff don't buy into the rationale or understand the need for change	4	Lack of performance measures to show that EPMP will protect habitat	4
Staff don't see the link from EPMP to the National Habitat Management Policy	4	Limited capacity to implement EPMP as a new program and actions arising out of it	4
Lack of meaningful input from staff into the development of EPMP and its tools.	4	Colleague negatively to EPMP (e.g., loss of credibility with colleagues who don't believe or accept EPMP).	3
Underlying motivations (EPMP perceived as justification for reducing resources)	3	Uncertainty regarding what constitutes a HADD (EPMP has changed the HADD definition; not clear what it is)	3
EPMP is politically motivated (can wait for government to change)	2	Inconsistency in application of our practices (e.g., wide range in responses to same case studies or applications)	3
Lack of clarity regarding Departmental values and role of conservation (belief that EPMP is to sustain development)	2	Concerns regarding certain operational statements	2
EPMP in theory has been accepted, however, the tools provided have not	2	Staff don't want to walk away from work they think is important	2
Cumulative impacts of low-medium risk activities not considered	1	Not convinced that EPMP has it right (that it will improve habitat protection)	2
Lack of strong advocacy by OHEB Managers	1	Need for explicit direction and instruction as do not believe in EPMP	1
No clear expectations (hidden objectives)	1	Not sure if EPMP is flavour of the day (i.e., don't want to invest in a big change that has to be undone)	1
No precautionary or ecosystem approach (focus on fish only)	1	Risk of litigation from First Nations and NGOs	1
Obstacles may be related to one or more elements; not all	1	Operational statements not reducing workload	1

2. National EPMP Survey– Internal Results – Spring 2006

As part of the National implementation of EPMP, internal and external surveys were conducted across the country during the spring of 2006. Results of the internal survey showed that staff generally felt that EPMP would achieve its intended outcome and that EPMP would lead to more consistent decision-making, however, there was split regarding whether EPMP is a more efficient and effective approach to habitat protection. Staffs in Pacific and Central and Arctic Region were less positive that EPMP will be fully implemented or that it will improve habitat protection. The Pacific Region participation rate in this survey was 30%.

3. EPMP Question and Answer, OHEB all staff meeting – November 2006

Staff raised a number of questions and concerns regarding EPMP at the OHEB all staff meeting in November, 2006. They questioned whether EPMP and its associated habitat streamlining tools will free up time for more monitoring, and whether DFO is achieving its No Net Loss/Net Gain Policy objective and if not, what will be done about it. Other comments included the need for clarity regarding the linkage between EPMP and the Habitat Policy, and concerns regarding declining resources to the program and the lack of continuation of the sunset stewardship program. These issues are similar to those raised during the internal staff engagement process.

3.2 EXTERNAL

1. National EPMP Survey– External Results – Spring 2006

Results of the external national EPMP survey showed that industry groups showed strong support for EPMP and they felt that it would achieve its objectives. Environmental Non-Governmental Organizations (ENGOS) were guarded in their support for EPMP and they felt that the focus on partnerships would lead to diffused accountability. Almost 50% of external participants were dissatisfied with the level of information provided on EPMP.

2. Regional EPMP Information Sessions – Spring 2006

Regional EPMP information sessions were held in the spring of 2006 with various industry groups, ENGOS and the stewardship community. Concerns raised by the ENGO community included the lack of consultation on EPMP, streamlining regulatory reviews when decision-making is getting more complex and professional judgment is required from DFO staff, whether application of the habitat protection provisions of the *Fisheries Act* will be compromised with the Risk Management Framework (RMF), and the science supporting the RMF.

3. Departmental Fall Consultations – Fall 2006

The EPMP was presented and discussed at the Departmental Fall consultations in 2006, which included 9 sessions located throughout the Region. Comments from participants included concerns regarding the move towards a results-based approach, the broad-based scope of EPMP, cumulative effects, and the lack of monitoring and enforcement to show that habitat is being protected.

4. Regional DFO-NRIA Workshop – February 2007

The National Resource Industry Associations (NRIA) and DFO sponsored a workshop in

Vancouver on February 20, 2007 with regional representatives from resource industries in BC and Yukon to promote measures that will streamline regulatory reviews while providing for more effective protection of fish and fish habitat. The workshop provided recommendations to encourage/increase the use of streamlining tools by developing a compendium of low risk activities per industry, integrating operational statements with best management practices, and clarifying boundaries between low, medium and high risk activities. A key outcome was the need for a regional structure to continue the work of the NRIA-DFO partnership in the region to enhance communication and information sharing regarding regulatory experiences and approaches among various industry sectors, and to identify opportunities for the development of new streamlining tools for regional needs.

Participants at this workshop were surveyed to identify issues related to the workshop objectives and for development of an enhanced communication plan. Key issues raised included concern with the degree of disparity from region to region and person to person and the need for consistency, the need for clear rules and goals, DFO's inefficiency in managing environmental assessment files including timelines, certainty of outcome and information requests beyond the scope, ensuring that communication on initiatives are made to individual operations and staff on the ground, disagreement or inconsistent interpretation on what constitutes a HADD, and the need for more practical examples or case studies showing what is a HADD and how the "harmful" part of the HADD is defined.

5. Regional ENGO Workshop – March 2007

The HMP and Salmon Enhancement and Habitat Advisory Board (SEHAB) organized a regional workshop that would bring together members of the community to increase the level of understanding of the EPMP, to discuss specific concerns and recommendations regarding EPMP, and to make recommendations for improving delivery of the habitat program. A planning team was established to prepare for the engagement and develop an issue paper to scope the discussion for the workshop. The team worked with local communities including stewardship and advocacy groups to summarize concerns and recommendations on EPMP. Three priority issues were selected for detailed discussion at the workshop: cumulative effects, monitoring and compliance, and sound science. The workshop report is posted on the SEHAB web site (www.SEHAB.org), along with a DFO status report on progress on the EPMP recommendations.

4.0 SUMMARY OF KEY FINDINGS AND LESSONS LEARNED

A key finding from the internal staff engagement process was that many participants do not believe that EPMP will protect habitat, despite that there is little evidence to validate this finding. Fish habitat protection was the primary interest of most participants, who attributed little or no benefit to the other objectives of EPMP including coherent, transparent, timely and predictable decision-making, and an integrated, balanced program consistent with the priorities of governments and stakeholders. Consistency, transparency and predictability are key components of an efficient and effective regulatory process.

There is a high impact of EPMP on the values and emotions of staff and Managers, and in many cases personal beliefs or values conflict with the Departmental values under EPMP. This

presents a significant challenge and further work is required to examine the extent of this impact and its implications for EPMP implementation.

The EPMP model was supported by several habitat practitioners, with the caveat that the tools are too primitive to permit effective and efficient fish habitat protection. There were differing opinions of practitioners with respect to the current tools. For example, some of the Operational Statements (OS) were supported by some Areas but not others (e.g., Clear Span Bridges). There was concern that the OS are not leading to reduced workloads in all cases, except where regional OS were developed for regional needs (e.g., shellfish aquaculture).

Some staff and Managers indicated that they were not convinced that the EPMP model has it right. They reported that the model was backwards in that more time should be spent working with the middle and smaller class operators, who have less resources available to hire professional help, and less time should be spent on referrals with the larger industry groups who have more resources available. The rationale, in part, was that they attributed habitat losses to the cumulative effects of multiple smaller, development projects. Others recommended stewardship and watershed planning as approaches to achieving the EPMP objectives.

A significant impediment to implementing EPMP is that many practitioners do not know whether socio-economic issues are supposed to be taken into account in decision-making and if so, how and by who? Some practitioners also questioned the link between EPMP and the Habitat Management Policy.

Internally, there was recognition and acceptance of the need to deliver a more coherent program within and among Regions. Discussions indicated that there is little information to assess whether the Region is being coherent in its approach to implementing the habitat protection provisions of the *Fisheries Act*. Some practitioners felt that there were inconsistencies while others indicated that there were “perceived” inconsistencies. External stakeholders, namely industry and consultants, also identified this as a top priority.

Another impediment to EPMP implementation is that staff and some Managers within the HMP are generally at the same level of acceptance and application of EPMP. Ideally, Managers would be higher up on the commitment curve to show leadership in implementing EPMP, resulting in a cascading effect throughout other levels of the organization.

There are several lessons learned from the initial EPMP implementation phase. First, the lack of engagement of staff early in the process of developing and rolling out EPMP has alienated staff, resulting in an incomplete understanding of the need for change and the objectives of EPMP, and in some cases, lack of support for EPMP. Second, EPMP was launched as a continuous improvement plan supporting Smart Regulation which has created confusion regarding whether the Habitat Management Policy still applies and how sustainable development and socio-economic issues are to be considered. Finally, communication and liaison with external stakeholders in the initial stages of implementation was lead nationally. Effort is now required at the Regional and local level to enhance communication and collaboration supporting EPMP.

5.0 IMPLEMENTATION GAPS AND OPPORTUNITIES

The following areas have been identified as implementation gaps and/or opportunities for further work to strengthen implementation of EPMP in Pacific Region, improve delivery of the HMP, and address staff concerns regarding EPMP. They are not ranked in order of priority.

1. *Enhanced Communication and Engagement (Internal and External)*

There is a need for a rigorous implementation approach that includes improved communication and engagement of staff as a key objective for implementing EPMP. Enhancement communication and engagement of external stakeholders, namely industry and ENGOs, is required to increase understanding of EPMP and/or work cooperatively to ensure efficient and effective fish habitat management.

2. *Understanding the Need for Change: Case for Action*

The Case for Action for EPMP needs to be clearly communicated throughout all levels of the organization. This includes the drivers for the change in the Habitat Management Program, the objectives and intent of EPMP, the mindset shifts, and the costs of inaction.

3. *Monitoring Progress Towards Achieving the EPMP Objectives*

Monitoring and performances measures are needed to demonstrate whether the objectives of EPMP are being achieved, including habitat protection; consistency, transparency, and predictability; delivering a balanced program integrated with the priorities of government and interests of stakeholders. There is also a need to showcase success stories and examples where EPMP is working well.

4. *Values and Emotions*

There is a need to acknowledge that EPMP has an extremely high impact on the values and emotions of staff and Managers. The extent of this impact and the associated personal values requires further review, including implications for program delivery.

5. *Workload Analysis and Priority Setting*

Workload pressures are extremely high. EPMP, and in particular the emphasis on high risk projects, habitat streamlining, and partnerships, presents an opportunity to analyze workload pressures, identify priorities, define what level of service can be provided and the rationale, and set more realistic workloads matched to staffing levels. This may involve formulizing activities (e.g., determining low, medium and high risk and the associated management actions) and developing criteria for priority setting.

6. *Tools and strategies for regulatory streamlining*

Further work is required to develop relevant tools to streamline habitat regulatory reviews, such as standardized project review forms, authorization templates, guidelines or best management practices, area-specific or tailored operational statements. There is also a need to make better use of existing tools and sharing tools among areas and Regions.

7. *Sustainable Development and Socio-economic Considerations*

Clarification on sustainable development and socio-economic considerations is required to support EPMP implementation. Staff are unclear whether socio-economic considerations are to be taken into account in regulatory reviews and if so, how and where. The DFO strategic plan says that DFO will take socio-economic considerations into account when assessing projects but staff are unclear how this relates to the habitat program and the Habitat Management Policy. Staff have also requested more clarity regarding sustainable development. For example, does it refer to the three pillar approach (environment, social, economic), the Habitat Policy (i.e., compensation to permit development) or ensuring sustainable fisheries?

8. *Habitat Policy, HADD Definition and Application of the Risk Management Framework*

Clarification was requested regarding the link between the Habitat Policy and EPMP, the HADD definition and how it changes with EPMP and application of the Risk Management Framework (RMF), and implications of the RMF in marginal habitat. Case studies or examples showing where certain types of projects fit into the risk matrix were suggested.

9. *Consistency/coherence:*

EPMP presents an opportunity to deliver a more coherent HMP. It was acknowledged that the mandatory training programs are a step in the right direction; however, additional effort is required. Staff suggested several approaches to promote and improve consistency among areas and Region, including re-activating the internal focus groups previously established for specific industry sectors (e.g., forestry, urban, riparian), increased audit and evaluation for specific habitat management issues, and field assessments or case studies involving staff from different Areas and/or Regions.

10. *Cumulative effects*

An analysis of the significance of potential cumulative effects associated with multiple low risk activities would provide more meaningful information to review the Operational Statements developed under EPMP and to address staff concerns regarding cumulative effects and the suitability of the EPMP model.

11. *Managing Client Expectations*

There is a need and opportunity to clearly define and manage expectations under EPMP and in particular, the Habitat Compliance Modernization (HCM) program. New directions under EPMP (e.g., refocusing on higher risk projects, triaging habitat occurrences) need to be communicated to the public and external clients and partners, and expectations regarding level of service must be clarified.

12. *Clear Roles, Responsibilities, Accountability, Leadership and Performance Expectations*

Practitioners recommended more discussion on what EPMP is and what it means and how it changes roles and responsibilities in the HMP. There is an opportunity to provide clear roles, responsibilities and accountability, and leadership at the management and practitioner level, and translate this into performance-based expectations for Area-based delivery of EPMP.

13. *Partnerships*

Enhanced partnerships with key external stakeholders (e.g., industry, ENGOs/stewardship community) will provide for improved communication and collaboration in achieving coherent, transparent and predictable decision-making integrated with the priorities of governments and stakeholders and more effective and efficient habitat protection.

6.0 CONCLUSIONS AND NEXT STEPS

The Region has made considerable progress in implementing the six elements of EPMP. Many of the current and previous regional approaches to habitat management are consistent with the direction of the EPMP, including the development streamlining tools, stewardship and local or Area-based partnerships.

Although there has been progress implementing the EPMP elements, there is little information to indicate whether the Region is achieving the intent and objectives of EPMP, namely, coherent, transparent, and predictable decision making, responsiveness and flexibility (results-oriented not rules driven), shared responsibility, and delivering a balance program integrated with the interests of governments and stakeholders.

The problem statement leading to the development of this Phase 1 Diagnostic indicated significant staff concerns regarding EPMP, uneven support for EPMP, and the lack of a common agreement regarding the degree to which EPMP has been implemented in Pacific Region. The Diagnostic revealed that support for EPMP in Pacific Region is uneven. In some cases, significant barriers to acceptance or taking action have been identified. Staff concerns regarding specific aspects of EPMP have not been resolved. Most notable is the impact of EPMP on values and emotions and the belief that EPMP will not protect habitat as well as previous approaches.

This review has identified thirteen themes as implementation gaps or significant opportunities to strengthen EPMP implementation, improve the effectiveness and efficiencies of fish habitat management in Pacific Region, and address staff issues and concerns regarding EPMP. These themes will be reviewed by the Project Leadership and Implementation Teams. The priority items will carry forward into the work plan for EPMP Implementation, where detailed task, activities and timelines for each theme will be developed.

7.0 APPENDIX 1: IMPACT OF CHANGE ASSESSMENT

Human beings are extremely adaptable when it comes to accommodating change in their lives. Nevertheless, we all have limits to the amount of change that we can absorb over a given period of time. The greater the perceived personal sacrifice associated with a change, the more we feel like dragging our feet. It can be difficult to cope with change if you reach an “overload” point.

How much impact do you believe the Environmental Process Modernization Plan (EPMP) for the Habitat Management Program (HMP) will have on you and your role in the organization? Complete the following survey and find out!

Respondent Information

Area or RHQ (specify YK, NC, SC, LFA, BCI, or RHQ):

Your Role (circle one):

Manager

Habitat Practitioner

Number of Years Working in Habitat:

For Managers Only -

Perspective in Completing Assessment (circle one):

Self

Habitat Practitioner

Date:

Instructions

Rate each statement (14 statements in total) using the 10-point scale. A “1” indicates a low impact on you and a “10” indicates a high impact on you. Place a checkmark in the column that best describes your assessment of the level of impact for each statement.

		Low Impact High											
#	Statement	1	2	3	4	5	6	7	8	9	10	Statement	
1	Amount –the EPMP doesn't require a large number of alterations in the way I work											Amount –the EPMP requires a large number of alterations in the way I work	
2	Scope – the EPMP doesn't affect the HMP											Scope – the EPMP will significantly affect the HMP	
3	Time – an adequate amount of time has been allowed for implementation											Time – too little time has been allowed for implementation	

		Low Impact High											
#	Statement	1	2	3	4	5	6	7	8	9	10	Statement	
4	Clarity – the reasons why the EPMP is being implemented are clear and understandable											Clarity – the reasons why the EPMP is being implemented are confusing and difficult to understand	
5	Personal Predictability – I have a clear understanding of how the EPMP affects my role											Personal Predictability – I have no idea how the EPMP affects my role	
6	Ability – I have or can attain the knowledge and skills necessary to implement the EPMP											Ability – I don't have and don't believe I can attain the knowledge and skills necessary to implement the EPMP	
7	Willingness – I feel motivated to implement the EPMP											Willingness – I don't feel motivated to implement the EPMP	
8	Values – the EPMP doesn't require any alteration in my values regarding how business should be conducted											Values – the EPMP requires a significant alteration in my values regarding how business should be conducted	
9	Emotions – the EPMP doesn't require me to feel differently about the way the HMP operates											Emotions – the EPMP requires me to feel differently about the way the HMP operates	
10	Knowledge – the EPMP doesn't require me to view existing information differently than I have in the past											Knowledge – the EPMP requires me to view existing information differently	
11	Behaviours – the EPMP doesn't require me to modify my daily activities (how I do my work)											Behaviours – the EPMP requires me to modify my daily activities	
12	Logistics – the EPMP doesn't cause any alterations to my job-related procedures (e.g. personal space, schedule, equipment used, etc.)											Logistics – the EPMP causes significant changes to my job-related procedures	
13	Financial – the EPMP doesn't affect my salary/ expenses/ funding, etc.											Financial – the EPMP affects my salary/ expenses/ funding, etc.	

		<div> <div>Low</div> <div>Impact</div> <div>High</div> </div>											
#	Statement	1	2	3	4	5	6	7	8	9	10	Statement	
14	Relationships – the EPMP doesn't require that I modify my current methods of working with others (e.g. clients, developers, partners, First Nations)											Relationships – the EPMP requires that I modify my current methods of influencing others	
Subtotals													
Total of all columns = A													
Divide A by 14 = B													
Impact Factor = B x 10 (10 – 100)													

Scoring the Assessment

- Add up the number of check marks by column and multiply by the rating for each column. Example: you have five checkmarks in the column labelled five. The subtotal for that column is 5 x 5 = 25.
- Add the scores to get the total for all the columns.
- Divide the total for all the columns by 14
- Multiply the result by 10 to determine your "Impact Factor", which will be a number between 10 and 100.

Interpreting Your Results

Scores of 66 and above = High Impact

Scores of 35 – 65 = Moderate Impact/Caution

Scores of 10 - 34 = Low Impact

8.0 APPENDIX 2: COMMITMENT ASSESSMENT

Purpose:

The purpose of this assessment is to provide a baseline measure of the commitment of managers and staff in the Pacific Region to the Environmental Process Modernization Plan (EPMP).

Respondent Information

Area or RHQ (specify YK, NC, SC, LFA, BCI, or RHQ):

Your Role (circle one):

Number of Years Working in Habitat:

Date:

Manager

Habitat Practitioner

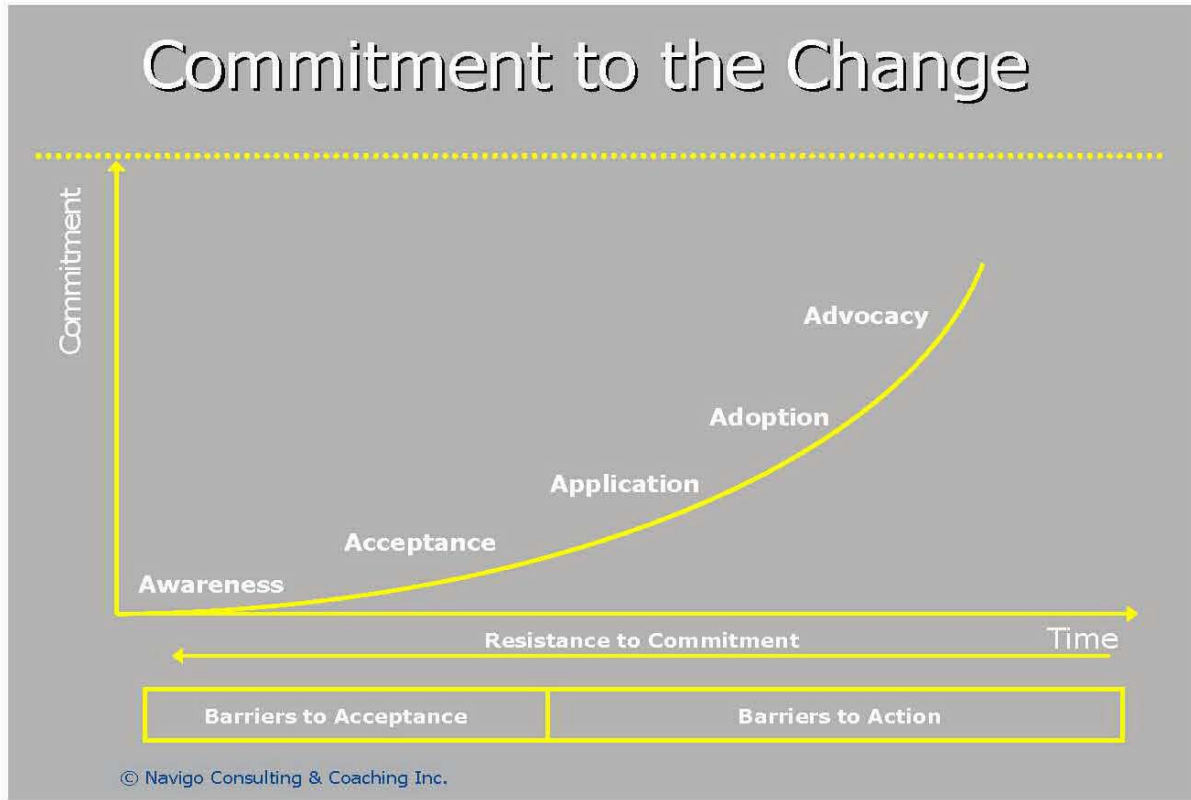
Instructions

- A) Review the definitions of the five levels of commitment.
- B) Record your current level of commitment to the EPMP on the curve with an X.
- C) If you are a manager, also record your perception of the current commitment level of your staff on the curve using the letter Y.
- D) If you are *below* the acceptance level of commitment, identify any barriers that are limiting your commitment.
- E) If you are *above* the acceptance level of commitment, identify any barriers to action that you may be experiencing.

Five Levels of Commitment

1	Awareness	I am aware of the need for the EPMP and know how I will be impacted
2	Acceptance	I accept the need for the EPMP and the impact it will have on my role
3	Application	I have the skills necessary to apply the EPMP in my role
4	Adoption	I know that the EPMP is here to stay as it is now part of how I perform my role
5	Advocacy	I feel positively about the EPMP and I am encouraging others to think similarly

Commitment Curve



Barriers to Acceptance	Barriers to Action
Sample barriers: no strongly felt need, change is contrary to self-interest, change violates personal values	Sample barriers: skills lacking, formal structures don't support required action, no perceived reward for changing