Submission to the Joint Review Panel
EnCana Shallow Gas Infill Development in the Suffield National Wildlife Area (NWA)

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Introduction

I am making this submission to assist the Joint Panel in its decision. I am presenting information and perspectives based on my experience as a professional wildlife biologist (retired) who was more or less embedded in Canadian Forces Base Suffield for 18 years of a 35 year career as a public servant employed by Environment Canada. My job at Suffield was to provide expert advice and support regarding wildlife management, wildlife habitat protection, wildlife research and monitoring, conduct of ecological land survey, and facilitating protected area management. During this assignment I served on two advisory committees, the Suffield Grazing Advisory Committee (SGAC) and the Suffield Environmental Advisory Committee (SEAC), which provided direction to the Base Commander on environmental protection.

Core Values Advocated by the Community

Below I present historic milestones to document the intent, expenditure, and societal resolve to formalize protection of a significant tract of prairie grassland on lands of the Suffield Block for the benefit of future generations. This is presented to illustrate there are well established core values advocated and demonstrated by the community and the landowner, such that there has been an exceptionally strong and well-defined effort and vision (active commitment) to establish an effective protected natural area in Prairie Canada. Protection is used here in the sense of protection from human exploitation.

1922

65 sq miles of prairie were set aside in what is now the NWA as Wawaskesy National Park to assist the recovery of pronghorn (Lothian, W.F. 1976. A history of Canada's National Parks. Vol. 1, Pp. 41-47 The Antelope Parks). The importance of the Suffield block prairies to sustain wildlife was recognized. Status of Wawaskesy NP was dissolved in 1938.

1941

The Government of Canada expropriated a 2,690 Km2 area in SE Alberta known as the Suffield Block to establish a military weapons testing range. This can be considered an ecologically significant event because a relatively large tract of native prairie was excluded from human exploitation.

1971

The Suffield Block was designated Canadian Forces Base (CFB) Suffield to be operated by the Canadian Army to largely serve as a military training area for Great Britain and Canada.

A Military Board of Inquiry was established to take into consideration the proposed military requirements and persistent public reaction to the likelihood that mechanized military training would damage the outstanding natural environment of the Suffield Block. In addition, local interestes supported by Provincial politicians wanted the land turned back to agriculture and possibly energy development.

The Board of Inquiry concluded by subdividing land use into areas reserved exclusively for military training (military training area-MTA), defence research (experimental proving ground-EPG), and environmental protection (environmentally protected area-EPA). The EPA comprised approximately 17% of the Block and was declared "out-of-bounds" to military training. It is the original EPA that largely constitutes the boundaries of the NWA and the "out-of-bounds:" commitment remains in force.

The Board of Inquiry solicited advice on many issues including environmental sensitivities, namely wildlife, landscape integrity, and trafficability. Its advisors were Dr. Ward Stevens of the Canadian Wildlife Service and Andy Kjearsgaard of the Alberta Soil Survey. Dr. Stevens produced the 1st ever wildlife publication on the Suffield Block-"Rattlesnakes and Tanks", and his efforts marked the beginning of a long-standing cooperative relationship between CFB Suffield and the Canadian Wildlife Service (CWS), an entity of Environment Canada, which has served the Base as the "wildlife agency of record" to this day.

1974-76

Canada and Alberta signed surface access agreements to facilitate exploration for, and development of, petroleum reserves on CFB Suffield.

Under those agreements, some of the Military Training Area was subdivided exclusively for petroleum development, overall access was subject to preparation of a comprehensive development plan by Alberta, including a rigorous environmental assessment specifying the intensity of development required to drain the petroleum reserves within 20 years. Environmental protection protocols were established based on wildlife studies and monitoring led by the Canadian Wildlife Service during the early 1970's'. Three Restricted Development Zones, essentially the 1971 EPA (now largely the NWA), were clearly identified as the focus of the Suffield Advisory Committee's (SEAC) mandate in the original access agreements.

1976

National Defence Canada and Agriculture Canada signed a MOU creating the Suffield Community Pasture consisting of 3 parcels overlapping portions of the MTA, the environmentally protected area , and the Defence Research experimental proving grounds.

This came after a protracted effort to deal with the issue of livestock grazing damaging the Middle Sand Hills that were part of the EPA set aside in 1971, and had been opened to cattle grazing in the late 1960's due to political pressure.

The Canadian Wildlife Service and Alberta Fish and Wildlife led the environmental studies of grazing impacts that confirmed the ecological significance and sensitivity of the EPA and recommended moving the grazing to more sustainable locations within CFB Suffield.

1992

DND and Environment Canada signed a MOU in the presence of Prince Phillip, President of the World Wildlife Fund for Nature, committing to protect the EPA under regulations of the Canada Wildlife Act as the Canadian Forces Base Suffield National Wildlife Area.

CWS and CFB Suffield worked very hard on putting this proposal together for vetting at the political level. The idea of creating a protected area under Federal legislation was unconditionally supported with great fan-fare by the public, Governments, ENGO's, and industry.

The need to protect such large blocks from the harmful effects of human activity had been recognized by conservationists and government. The Prairie Conservation Action Plan prepared in 1990 called for a large protected prairie site in each prairie ecoregion and the Federal Government's Green Plan was advocating the protection of up to 12% of Canada's freshwater and land**.**

So it was a significant event on the 11th of March 1992 when the Department of National Defence and the Department of Environment signed a Memorandum of Understanding to protect 458 square kilometres of Canadian Forces Base Suffield as a National Wildlife Area. With the stroke of a pen an area larger than Grasslands National Park at that time was destined to become the second largest National Wildlife Area in Canada.

1994

The CFB Suffield feral horse herd was removed in response to concerns of environmental impacts affecting wildlife habitat and species in the proposed NWA. A Citizens' Advisory Committee reviewing the feral horse issue recommended disposal of the horse herd by adoption but also recognized the ecological significance of grazing and the need for a large herbivore in the grassland ecosystem of CFB Suffield once the horses were removed.

1997

On 18 February 131 elk were trans-located from Elk Island National Park, Alberta to CFB Suffield as a re-introduction of a large herbivore designed to restore ecological integrity in the proposed National Wildlife Area.

1998

On 27 February 89 elk are trans-located from Elk Island National Park to CFB Suffield to supplement the recently established herd.

1999

The "Partial Access Agreement" between Alberta and Canada granted surface access to Alberta and its agents for the purpose of "deep rights" oil and gas exploration within CFB Suffield, excepting the NWA. That exclusion was a significant political recognition that continued energy development was inconsistent with the objective of establishing a protected area and was not in the public interest of Alberta or Canada.

2001

Acting on a recommendation from SEAC, construction of Alberta Energy Company's north boundary pipeline was diverted by order of the Base Commander, outside of the Base to avoid the proposed NWA. Again, this was a signal that additional industrial development in the protected area was not welcome.

2002

A proposal to dam the South Saskatchewan River below its confluence with the Red Deer River (The Meridian Dam Project) was rejected by the governments of Alberta and Saskatchewan. While the proposal was largely dismissed as economically unfeasible, the absence of ecological benefits and the plethora of significant ecological burdens articulated during the public hearings certainly had a role to play in the decision. Central in this regard was the loss of wildlife habitat in the proposed CFB Suffield NWA due to anticipated reservoir impacts.

2003

19 June the CFB Suffield National Wildlife Area was officially gazetted by Canada Wildlife Act regulation. Administration and control of the NWA resided with National Defence and all powers to operate the NWA were delegated to the Minister of National Defence in trust to the Base Commander.

2003

EnCana extends a winter-only drilling/construction protocol to areas bordering the NWA within the SE quadrant of CFB Suffield. An access road was built to divert vehicle traffic away from the core summer range of snakes on CFB Suffield. These mitigations were implemented in response to snake conservation study results on habitat use and mortality resulting from new shallow gas development activities at CFB Suffield.

2004

SEAC challenges CFB Suffield and EnCana to develop a basis of knowledge concerning cumulative effects of shallow gas development and a vision for management of the NWA which would serve to better assess development applications and manage development over the long run. This created a *de facto* moratorium on shallow gas infill in the NWA bringing in to question further energy development in the protected natural area.

2005

A MOU is drafted which lays out a cooperative approach involving CFB Suffield and the Canadian Wildlife Service to advance the operation of the CFB Suffield NWA.

This MOU is built upon a shared commitment to environmental stewardship to sustain and enhance the ecological integrity of the National Wildlife Area.

The relationship will involve a cooperative process of open communication, and consultation and advice, between the Participants. The Canadian Wildlife Service on behalf of Environment Canada has a strong interest in the orderly operation of the NWA. That site is a legislated part of the National Network of Protected areas governed by the Canada Wildlife Act. Ultimately, Environment Canada is answerable to what happens on the site – obviously sharing that responsibility with National Defence.

2007

CFB Suffield and the Canadian Wildlife Service draft a "Management Strategy" for the NWA in response to the SEAC recommendation of 2004 asking for "A long-range vision for the NWA" and "A biological monitoring plan for the NWA to accomplish the following: Track the state of, and ecological functions within, so that change is understood and environmental cause/effect relationships can be correctly identified".

Unfortunately this important document has not been concluded, hence management decisions, including those to be made by the Joint Review Panel, are being determined in the absence of critical policy expectations.

From a conservation perspective the history of CFB Suffield is largely a continuum of decisions of record by the Military, governments, and stakeholders that have set a clear precedent for conservation of prairie wildlife and its habitat. **In the NWA wildlife has always taken precedent in light of land use pressures. Wildlife has always dodged the bullet due to the diligence of an understanding land owner and political resolve.**

At CFB Suffield the Military have a 36-year record of dedication to prairie conservation focused on the lands now comprising the NWA. That dedication should be understood and recognized by all as unequivocal – wildlife 1st, not human exigencies.

I submit that these are the core values advocated by the "Community" that must be considered by the Joint Panel in determining the significance of adverse effects arising from the infill drilling proposal.

ALTERNATIVES TO THE PROJECT

It is a certainty that during this joint panel review compelling arguments will be made for suspension of further energy development in the NWA whether or not the project is approved. In fact, that nagging question is what led to the challenge SEAC made to DND and EnCana in its 2004 annual report wherein the Committee asked for a vision statement (policies and a strategy that would guide management of the area consistent with its legislated mandate) as follows: "Consequently, SEAC respectfully recommends that the following are required before any further development applications in the NWA are submitted for approval. 1. A long-range vision for the NWA….Etc." Furthermore, an end to shallow gas drilling in NWA was put on the table within EnCana as early as 2003, as it was anticipated that because of the pending designation of the NWA the Company's drilling activities would come under ever closer scrutiny (Memorandum-Davies, Dan to D. Woloshen, J. Donihee, V. Klaassen, and J. Hann. 07 March 2003 Re: Snakes and drilling schedules.).

The point I want to make regarding the above is that the Joint Panel should broaden the scope of its assessment respecting alternatives and decisions of record. A no-go decision would still beg the question of Alberta's and EnCana's rights which neither would have volunteered to reqlinquish. Thus, a sunset scenario accommodating current operations and a buyout of future considerations would be in order. These things should have been examined as alternatives to the project.

I recognize that the proponent was expected to assess a sunset scenario in the EIS as they were instructed to look at alternatives form their perspective of being the rights holder to a resource and maximizing recovery of that resource. Nevertheless I suggest that the Joint Panel include in their analysis the no-go - sunset scenario - buyout option in their analysis.

OPPORTUNITY COSTS

I want to comment on the scope of investment realized in establishing the Suffield NWA so that one can consider certain opportunity costs associated with the proposed infill project.

Note in the Regulatory Impact Analysis Statemtent (RIAS) which publicly disclosed the intent to establish the NWA, reference to the estimated value of the lands that were secured under protective status. For a more up-to-date assessment I considered two sources-native grassland sold in 3 counties bordering Suffield (MD 376 Cypress, MD 118 Forty Mile, MD 464 Oyen), and the value of EcoGifts in Canada based on the mix of fee-simple land donations and conservation easements.

Native grassland sold in the past 18 months in SE Alberta on a per hectare basis as follows: max $2471, min $333, mean $1377 hence value of the NWA estimated value of the NWA lands could be $15-$113 million, mean $63 million.

Compare this to EcoGifts in Canada currently totaling 54,679 hectares valued at $257 million or $2274/hectare. At these values, the cost of securing conservation lands equivalent in area to the NWA through purchase fee simple or through conservation donations would be $215 million.

Another comparison would be expenditures to purchase lands for Grasslands National Park in Saskatchewan which at present is approximately the same size as the NWA. Perhaps the Joint Panel can obtain information on the to-date costs of assembling the land for Grasslands National Park to better quantify the value of the lands of the NWA.

The Joint Panel should understand that the replacement costs of native prairie are high and cost-effective opportunities to secure large blocks of pristine prairie do not happen every day, or if ever again in the Canadian Prairies. Keep in mind also that as we speak, the Government of Albert is quietly selling of significant acreages of Public Land in the Mixed-Prairie grasslands of southern Alberta. Industrial development in the NWA has chiseled away at what was a once-in-a-lifetime accomplishment that was cost-effective for the public purse and the people of Canada. As industrialization overwhelms the landscape of the NWA that land may no longer qualify or be effective as a protected area.

The NWA provides other services that will be compromised by additional energy development. The CFB Suffield NWA is a natural grassland area set aside to perpetuate the representative prairie land cover, its wildlife diversity, and to protect its overall ecological integrity from human land use. Other roles or services of the NWA include:

Protect natural prairie heritage for Canadians
Maintain ecological diversity
Serve as scientific control-research area
Public Education

As a natural area, the NWA serves as a comparative benchmark by which sustainable use of the remainder of CFB Suffield and the surrounding region can be identified and

achieved. It is where the nature and pace of human disturbance has to be carefully regulated otherwise there will be no benchmark to validate management decisions. In other words it serves as a scientific control and ecological research area where grassland ecosystems can be monitored, studied, and understood.

As a natural area, the NWA is a mitigation area which compensates for the more intensive land use impacts on the remainder of the Base; it is how DND demonstrates its operational commitments through due diligence by excluding military training over nearly 20% of the land base for conservation/biological diversity.

So why has DND allowed an NWA to be established? It demonstrates their due diligence in management of the entire block for environmental sustainability. More importantly however, the 458 km of protected prairie is a nationally recognized initiative that served and will be monitored as a cornerstone of Canada's overall efforts to conserve its prairie heritage. The CFB Suffield NWA is a natural grassland area set aside to perpetuate the representative prairie land cover, its wildlife diversity, and to protect its overall ecological integrity from human exploitation.

UNDERSTANDINGS

For the information of the Joint Panel I want to comment on statements made by the Proponent in the recent past and in the EIS pertaining to understandings about how the designation of the NWA would impact on land use and the Company's operations ((EIS, Vol. 1. Pp. 1-2), and secondly, that the declaration of an NWA after the drilling of 1,100 wells is indicative of the minimal environmental footprint of EnCana's operations (EIS Vol 1, Pp. 1-4).

First of all consider the following comment recorded in the Minutes of the 2005 Annual General Meeting of SEAC with SIRC (Item 21 NWA EA Update) - "The President of SIRC added that EnCana is allowed to drill shallow gas wells in the NWA in accordance with an **1992 Base/CWS MOA** that states that development of the NWA would not impact upon their existing activities, one being shallow gas development. This paragraph is also included in the **regulatory impact assessment**."

For the record the following quotes from the MOU are relevant:

The "**1992 Base/CWS MOA**" is more correctly identified as the "Memorandum of Understanding between Canada as represented by the Minister National Defence and Canada as represented by the Minister of the Environment".

The MOU was not anticipated to "interfere with other agreements or arrangements or with the advisory committees established by previous arrangement as they pertain to natural gas development and cattle grazing" (Section 5.10).

The scope of the MOU specified that DND "would manage the Middle Sands and Mixed Grasslands Area as specified in Annex A and recommended by the existing environmental committees (Suffield Environmental Advisory Committee, Suffield Grazing Advisory Committee)" (Section 5.2).

The objectives of the MOU were to "manage the CFB Suffield National Wildlife Area within the spirit of a National Wildlife Area Designation" (Section 4.1), and to "undertake a coordinated proposal for an Order-In-Council declaring the CFB Suffield National Wildlife Area to be a National Wildlife Area under the Canada Wildlife Act" (Section 4.2).

The MOU expired March 2003.

The take home point I want to make is that the MOU neither condoned nor precluded shallow gas well development in the proposed NWA. It simply committed to managing the NWA with concurrence of the Suffield Environmental Advisory Committee and the landowner.

For the record: The "**regulatory impact assessment**" is more correctly identified as the "Regulatory Impact and Analysis Statement" or RIAS (Canada Gazette 2004). Statements therein pertaining to land use are quoted as follows:

"Cattle grazing and shallow gas recovery which operate under existing Memoranda of Agreement (MOAs) will continue subject to the environmental screening protocols specified in the respective MOAs controlling those activities, and the *Wildlife Area Regulations*."

"Application of the *Wildlife Area Regulations* under the *Canada Wildlife Act* offers direction for guiding land use on this important prairie grassland area. This will formalize wildlife and habitat protection that will enhance regional wildlife populations, thereby addressing the concerns of both Alberta and nearby Saskatchewan wildlife agencies, as well as non-government environmental organizations."

"Furthermore, it (the CFB Suffield NWA regulation) will impact on any new proposed land use developments within the NWA such as water management projects, resource extraction and agriculture. Since new activities could potentially harm wildlife habitat, such proposed activities could be subject to approval and mandatory environmental screening under these regulations".

The take home points I want to make here are that in being published twice prior to passing of the founding Regulation, the RIAS was inviting public comments on the disclosure that as a result of the Canada Wildlife Act regulation to establish the NWA land use activities and developments would be impacted by the Regulation, and in this regard the RIAS singled out "new proposed land use developments" including resource

extraction and agriculture, both of which would be under scrutiny. EnCana did not submit comments, concerns, or understandings for consideration.

On the other hand, in 1992 National Defence and Environment Canada agreed to formalize protection on the EPA at CFB Suffield because all indications were that industrial development aspirations in the area had been satisfied and current levels of development would be compatible with sustaining the health of the protected landscape. The intent was never to sanitize the area of approved activities but rather, continue to manage those activities as overseen by the respective advisory committees.

Indeed, during the period 1992 through 1998 all indications were that shallow gas development aspirations had been satisfied particularly in the lands of the proposed NWA. From 1990 through 1995 there were no gas wells drilled within the proposed NWA. In 1995 there were no gas wells drilled on the whole Base. At the June 1997 SEAC Annual General Meeting, Alberta Energy Company-Mr. Biemans outlined plans for gas wells in Areas C and D indicating this was warranted "because of the evolution of economics". SEAC took notice of this proposed significant change in gas recovery operations at CFB Suffield and commenced scrutinizing plans more closely.

In 1998 Alberta Energy Co. submitted gas development plans for 1998-99 in CFB Suffield indicating an infill drilling program for all but the most northerly 1.5 townships across the base which would commence with 37 wells drilled in 1997 to a projected 290 in 98 and up to 500 in 1999. At the June 1999 SEAC annual general meeting Alberta Energy Company-Mr. Biemans talked about EUB well density regulations, considerations, and what is anticipated in Suffield in the future regarding potentials in the proposed NWA. His indication was that the NE corner of Base Suffield is low potential with anticipated 1 well per sq mile sufficient, while the potential builds to the southwest quadrant of the Base to a maximum of 6 per sq mile. While EUB regulations set well density at 4 per sq mile, exceptions could be applied for with spacings as low as 500m. With this information SEAC acknowledged that the South Block of the proposed NWA would be drilled and pointed out this could impact snake populations in the area. The Base Commander authorized a study to monitor the situation as the drilling program commenced in the year 2000.

In 2001 SEAC commented on the justification of Alberta Energy Co.'s intent to conduct an infill pilot program adjacent to the restricted development zone in the Casa Berardi Area but on lands of the proposed NWA. That pilot program proceeded without further SEAC scrutiny because the location was outside the RDZ and hence outside the committee's mandate.

In 2002 SEAC (Item 6, SEAC Inspection Report 2002) recommended monitoring how wildlife and the environment have responded to this level of development (16 well pilot) in sensitive terrain.

In 2003, EnCana-R. Timmons advised the SEAC annual general meeting that given a 2nd 16 well pilot in Battery C2, infill will proceed at 1000 shallow wells per year for the next

4 years and include required gathering system to accommodate new production. No site- or area-specific plans were presented. But he also said the pilot results could mean up to 10,000 new wells at 2500 per year for 5 years to bring overall well density to about 12 per section. Approaches could be to scatter annual drilling, or concentrate in smaller areas and install new gathering system over the old in these areas. Final prediction was, based on the 16-well pilots, to drill 1000/year for next four years and install gathering system to handle increased production.

A reading of the records, reports and recommendations of SEAC since the infill program has been implemented across the Base will show that proliferation of EnCana's disturbance footprint at CFB Suffield is indicative of a significant impact that is viewed by many as inconsistent with the objectives of a protected natural area.

EFFECTS IDENTIFICATION AND ASSESSMENT IN THE EIS

I would like to comment such that the Joint Panel will take care to follow-up on these points as appropriate in its analysis.

EnCana's field program to quantitatively evaluate project effects was an observational study. As such other inherent sources of variation and variables affecting their measurements could not be controlled. Further, control and impact areas are inherently different in any biological measure and the inability to randomize and replicate treatments prevents control of this important aspect.

In its assessment of wildlife impacts EnCana only used species abundance measures to test for significant impact effects. In a biologically unstable environment (constantly changing) this is inappropriate since abundance will not reflect the true long-term impact disturbance may have on the complex ecological relationships that form the biological integrity of the protected natural area. What is really required here are good data on the behavior, productivity, and health of populations of species and inter-specific relationships such that one understands the effects of activities and the disturbance footprint.

An important step in planning a field program is to determine how many samples are needed in order that the statistical significance tests will have a reasonable chance of actually detecting a well-density impact (distance impact), if one exists. This must take into account the strata involved, the number of levels of well drilling (drilling intensity – e.g., at 4, 8, 16 wps), and the variability that exists in the biological system in the SNWA. In designing their biological field program, EnCana did not indicate that they conducted a power analysis to determine the sample sizes required. Using the data collected in their 2006 field sampling program and subjecting them to Power Analysis, EnCana would only now be able to identify a level of sampling intensity and experimental design required to reliably test the hypotheses and conclusions it claims to have tested in the EIS.

While EnCana evaluated field data with tests of statistical significance, it did not bring biological significance and the precautionary principle into its analysis. Tests of statistical significance only means that a result was unlikely due to chance. Biological significance implies importance in some sense. To bring this into the analysis EnCana would have had to define in its field planning stage what constitutes a biologically meaningful difference between control and impact and through equivalence testing making the effect of concern (drilling will impact the environment in a biologically significant way) the null hypothesis while making the no impact effect the alternative hypothesis. In this way EnCana would be required to prove that the project would have less than a biologically significant effect. In this method the precautionary principle is applied, and the adverse effect is assumed unless the data suggest otherwise.

As another example of this, the disturbance footprint data were not effectively used to assess habitat fragmentation in the exercise designed to identify potential environmental effects of the Project on wildlife (Vol. 3: pp 5-41 – pp 5-44). Here in the EIS, a habitat fragmentation model was developed using the disturbance footprint database. The model was built with only data for major pipelines (trunks) and raised roads while purposely excluding data for "minor pipelines such as loop lines and tie-in lines, well sites and tie-in holes, and access trails, as these disturbances were not considered to contribute to fragmentation". Following through then, was the conclusion that fragmentation is "not considered to be a key issue for this project as the anticipated surface disturbance from pipelining and well tie-ins will be less than 2 metres, and less than 4 metres for loop lines; widths insufficient to result in a habitat fragmentation effect. Effects of habitat fragmentation as a result of the Project are therefore not assessed" (ibid: pp 5-43). Access trails and tie-in pipelines are obvious structural anomalies of the land cover throughout the NWA which suggests there is potential to affect grassland integrity and impact on the natural behavior of wildlife.

Construction and operations activities tend pretty much to create and maintain a linear disturbance footprint that fragments the land cover in very distinct ways. That disturbance footprint is an anomaly in one way or another. For example, linear disturbance features are distinct in terms of type and structure of the residual vegetation, amount of bare soil, and pattern of the vegetation cover on the right of way. This anomaly is visually distinct, it is most certainly perceived and used differently by wildlife, and in altering or temporarily removing the natural vegetative sward it facilitates the establishment and spread of invasive species.

WHO IS THE GATEKEEPER?

I am skeptical of the proposed environmental protection plan presented in the EIS. The basic tenet of the plan is that EnCana would be responsible for the delivery of all phases of the plan and decision-making for all phases of the project.

Given that there is a decision to proceed with the project, the landowner DND cannot accept the EPP for the simple reason that they would not be in control of the delegated responsibilities for managing and protecting the legislated protected area. There is no alternative but to maintain control of the decisions regarding planning, implementation, operation, monitoring and follow-up given that all activities have to be permitted on a case-by-case basis.