Re: Comments on Proposed Project List under the amended Environmental Assessment Act, ERO# 019-2377

Nov 10, 2020

Dear MinisterJeff Jurek,

I appreciate having this opportunity to comment on Proposed Project List under the amended Environmental Assessment Act, ERO# 019-2377.

Nevertheless, it is fair to say that changes proposed here, additionally to other reversals of legislative tools that were to protect environment, endangered species, water safety, sustainable managing of natural resources, environmental rights of Ontarians, Conservation Authorities and ensure participation of public in land use decisions, are a cause of a grave concern to me.

It is difficult to comprehend these steps when most of people do understand that nature is in a enormous distress due to our activities and very few doubt that climate crisis and biodiversity decline are real.

Environmental Assessments perform multiple crucial tasks at various stages and all sizes of projects that are indispensable to prevent long lasting or permanent impacts to nature.

Recent Report by The Canadian Parks and Wilderness Society (CPAWS)

HEALTHY NATURE HEALTHY PEOPLE- A CALL TO PUT NATURE PROTECTION AT THE HEART OF CANADA’S COVID-19 RECOVERY STRATEGIES stresses that nature, parks and protected areas are essential to our lives and economies. It also adds that some provinces and territories still need convincing:

"Ontario is liquidating rather than conserving nature

In stark contrast to the momentum that is building for nature conservation elsewhere in the world, Ontario seems stuck in a past era when nature was a resource to be exploited as fast as possible. Its proposal to increase urban sprawl by opening up more precious farmlands and other rural areas to developers in southern Ontario is raising deep concern.

The recent push to double logging in the province will foreclose on options to build back better after the pandemic, contribute to the demise of endangered species like caribou, and worsen our climate crisis. Ontario’s ‘open for business’ approach may also undermine the province’s ability to manage parks for ecological integrity, as required by law. Logging will continue in Ontario’s flagship park, Algonquin, harming the park’s ecosystems. The natural ecosystems of the province will continue to decline, first from never-ending threats and second, from neglect and provincial under-funding."https://cpaws.org/2020parksreport/

This expresses great concerns regarding the way Ontario is heading.

The proposed list of projects to qualify for a full environmental assessment is incomplete and problematic through its lack of scientific explanation and required reference to the ministry’s Statement of Environmental Values.

The notice doesn’t provide evidence to explain how environmental risks of various types of projects were evaluated to produce the proposed list. It offers no explanation for why other potential project candidates (for example. sewage treatment plants, quarries, fracking, refineries, pipelines, forestry operations, pulp mills etc.) were excluded from the list. As a result, this list is not credible, transparent or accountable in determining projects with “the greatest potential harm.” The government must go back to the drawing board and show the basis for its decision-making.

The notice asserts the proposed list was guided by the government’s desire to “eliminate duplication with other legislation, policies and processes.” But the consultation materials have not identified any instances of unnecessary overlap between the EAA and other policies or laws. In fact, it is only the EAA that requires analysis of (a) the need for the project; (b) alternatives to the project (c) “alternative methods” of carrying out the project; and (d) the environmental, social, cultural, economic, and other effects of the project and its alternatives.

For projects such as new highways and railways, distance is not the appropriate measure of potential environmental impact — instead, the location of the project is more important in determining potential harm. For example, whether it crosses sensitive wetlands, woodlands wildlife habitat and farmland.

The incomplete nature of the proposed list (which contains 13 categories of designated projects) is demonstrated by comparing it to the federal project list under the Impact Assessment Act, which contains 61 categories of projects.

Please, reconsider proposed changes after further consultations.

Your truly,