

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 794
November 9, 2020

Sharifa Wyndham-Nguyen
Client Services and Permission Branch
Ministry of Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

Dear Sharifa:

Subject: ERO # 019-2377: Proposed Project List for Comprehensive Environmental Assessments under the Environmental Assessment Act (EAA)

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed the proposed project list for comprehensive environmental assessments under the Environmental Assessment Act (EAA) and provide the following comments for consideration.

The OFAH is concerned about the approach that the Ministry of Environment, Conservation, and Parks (MECP) is taking in modernizing the EAA. The proposed approach involves two projects lists: one that outlines high impact projects which require a comprehensive environmental assessment (EA), and one that lists a streamlined EA process for medium impact projects. We believe that this leaves room for projects with unpredicted impacts to move forward. It is not feasible to predict every type of project that may have high or medium environmental impacts, as the impacts could vary depending on many different factors including location, habitat type, and species composition. In the project list, the triggers for requiring a comprehensive EA are mostly based on the size of the project. The OFAH believes that the triggers should also include environmental considerations that are independent of project size (e.g. proximity to natural heritage features such as wetlands). Is there a mechanism for a project that is not on the list to be reviewed by the MECP? The OFAH recommends that the MECP develop a provision in the regulations that would allow stakeholders, interested parties, and members of the public to request that projects that are not on either list be evaluated.

The proposal seeks input on when mining operations should require a comprehensive EA. In the OFAH's opinion, any new or expanding mining operation should be subject to a comprehensive EA, as they will certainly have some form of impact on the environment. Minor changes to existing mining operations, that do not include expansion, could be considered for addition to the streamlined EA list.

While we recognize and acknowledge the benefit of removing red-tape for low-risk projects, we are also concerned about the potential for cumulative effects of habitat alterations to go undetected and unaddressed. The OFAH suggests that MECP develop a tracking mechanism to take into consideration the number of projects being approved in an area (e.g. watershed, or other environmentally relevant area), and the associated thresholds, to prevent many low impact projects from accumulating into large-scale environmental issues. Has the MECP considered the potential for cumulative effects of many projects on environmental health? A stand-alone project may appear to be relatively benign, but too many projects on the landscape are believed to account for the largest loss in productivity of natural resources in the long term.

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The OFAH recommends that the MECP monitor the environmental impacts associated with all low, medium, and high impact projects moving forward in the province. Baseline environmental data should be a mandatory component for all project types in order to truly determine what effects the projects have on the environment. This monitoring effort is also essential for measuring the success of the modernized EAA and making government decision-making processes transparent to the public. If it is determined that the new EAA is not improving outcomes for the environment, then the process must be made more rigorous.

Thank you for considering our comments.

Yours in Conservation,

A handwritten signature in black ink, appearing to read "La Tonelli". The signature is fluid and cursive, with the first name "Lauren" and the last name "Tonelli" clearly distinguishable.

Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OFAH Fish and Wildlife Staff