



# The Ontario Headwaters Institute

January 30, 2021

Planning Consultation  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs and Housing  
PDF via email to [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca)

## **RE: ERO 019-2811 - Schedule 17 of Bill 197 (Amendments to the Planning Act)**

Dear MMAH staff and colleagues on the One Window Planning Team,

The Ontario Headwaters Institute supports the expressions of concern in the January 19 submission from the Canadian Environmental Law Association (CELA) and offers a few further comments.

In their submission, CELA notes numerous serious short-comings in how Omnibus Bill and their schedules avoided proper legal, democratic, and consultation protocols. CELA has been charitable, probably due to an abundance of compassion – that we share – that members of the Ontario Public Service not be saddled with criticisms more properly levied at the government: those MPPs with the authority to table a money bill.

We therefore ask you, as the members of the OPS, to note widespread disaffection with the government's current actions, not just from the OHI but from hundreds of organizations including other major ENGOs and ENGO alliances, municipalities, conservation authorities, agricultural organizations, and others, that:

- The use of omnibus funding bills limits reasonable discussion on non-financial elements that would benefit from broad consultation, sending disturbing messages that the government favours ridged mindsets over reasonable discussion;
- Legislative cloture limits discussion even amongst members of the legislature not part of the government;
- Omnibus financial bills expedited by cloture that include environmental initiatives violate promises of the government to not use emergency measures during the pandemic to address non-emergency issues;
- The general public and organizations in civil society see clear distinctions between the major reshaping of Ontario's environmental protection regime being accomplished in an underhanded manner through omnibus financial bills vis-à-vis and window-dressing consultations through superficial website surveys or minimal consultation efforts on narrow issues such as Permits to Take Water; and,
- ERO postings on issues already given royal ascent amount to mortuary cosmetology.

In short, we ask the government, through you and this submission, to pursue the Trust and Transparency Principle of the Made in Ontario Environment Plan in an open, democratic, and consultative manner.

Sincerely,

*Andrew McCammon*

Executive Director