



21 August 2023

Debbie Scanlon
Conservation and Source Protection Branch
40 St. Clair Avenue West, 14th Floor
Toronto, ON
M4V 1M2

By email: Protected.Areas@ontario.ca

Re: ERO-019-7356 - Development of a Project Evaluation Policy under the Provincial Parks and Conservation Reserves Act

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems across the province. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

The proposed Project Evaluation Policy under the Provincial Parks and Conservation Reserves Act would guide the planning and assessment for certain Projects in provincial parks and conservation reserves carried out by or on behalf of the Ministry of Environment, Conservation and Parks (MECP).

In other words, this posting is proposing to exempt “certain projects” in provincial parks and conservation reserves from the Environmental Assessment Act (EAA), and the new proposed policy would replace the public consultation and environmental evaluation currently required under the Class Environmental Assessment.

The ORA is strongly opposed to any proposed Project Evaluation Policy that would allow the MECP to undertake these major and complex projects and decisions without any public awareness, public consultation or public scrutiny:

1. Alter park and conservation boundaries at MECP’s discretion;
2. Environmental oversight designed to reduce delays on projects;
3. Replace or decommission an electricity generation facility and supporting infrastructure; and
4. Develop an electricity generation facility and supporting infrastructure (for provincial park or conservation reserve use).

This government has been systematically removing public consultation opportunities for projects and issues of strong public interest, which goes against the spirit and intent of section 35 of the Environmental Bill of Rights (EBR).



Provincial parks and conservation areas must not be exempt from the EAA as there will be no legal requirement to consider:

1. Potential environmental effects;
2. Mitigation measures;
3. Alternative ways of carrying out the undertaking, and
4. Alternatives to the undertaking.

There is also no decision-making mechanism which considers the environmental advantages/disadvantages of the undertaking.

The substitution of the EAA with a non-binding policy document is neither a sufficient replacement for statutory requirements obligating consideration of a project's social, economic and environmental effects.

The ORA is very concerned that this proposed policy would fully remove the public from the consultation process. We strongly encourage the MECP to ensure that this government upholds the spirit of section 35 of the EBR by rejecting this Project Evaluation Policy.

Thank you for this consultation opportunity!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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