



# The Ontario Headwaters Institute

August 22, 2020

Antonia Testa  
EA Modernization Team  
Ministry of Environment, Conservation and Parks  
Via email to [eamodernization.mecp@ontario.ca](mailto:eamodernization.mecp@ontario.ca)

**RE: ERO 019-1883 – Exempting various MOT Projects from the EA Act**

Dear Ms Testa,

In addition to being a member of and supporting the submission from the Simcoe County Greenbelt Coalition, the Ontario Headwaters Institute provides this note to make a few additional comments.

Our comments relate to the three of the first six sentences of the proposal details, as follow:

- S1. We have no idea how exempting select projects can help deliver the commitment in the Made-in-Ontario Environment Plan to modernize the EA program;
- S4. We are deeply concerned about the implication that the Ministry of Transportation might be unable to maintain critical road infrastructure unless these environmental assessment requirements are trimmed. We request both ministries assure us and the Ontario public that critical infrastructure is in good condition and not in jeopardy of compromising public safety; and,
- S6. This is a tautological statement – reducing duplication makes things faster -- that is also not necessarily consistent with the mandate of the Ministry. We have no qualms about MECP reducing administrative duplication nor collaborating with other ministries in support of government efficacy. That, in fact, appears to be the first half of the tag line on the Ministry’s home page: “Leading to healthier communities and economic prosperity through protecting Ontario’s air, land, and water.” We are concerned, however, that you may not be adequately addressing the second half of the tag line when you emphasize bringing infrastructure quickly instead of doing so in a safe ecological manner. We urge you to amend what you consistently refer to as Ontario’s outdated environmental assessment program, soon, while honouring the Trust and Transparency principle of the environmental plan. We also urge the Ministry to develop a larger world view to support sustainable development as a way to ensure the ecological, economic, and social well-being of Ontario for future generations, as opposed to a similar recent effort that exempted large swaths of forest from the same EA process under the Covid-19 Economic Recovery Act.  
IE – It is time to stop the exemptions and amend the EA process.

Please feel free to contact the undersigned at your convenience for any needed clarification.

Sincerely,

*Andrew McCammon*

Executive Director

Working to protect Ontario’s Watersheds, Natural Heritage, and Receiving Waters  
[andrew@ontarioheadwaters.ca](mailto:andrew@ontarioheadwaters.ca) ♦ 416 231 9484