

October 22, 2023

Permissions Modernization Team, MECP

Via e-mail and posting on the ERO

**RE: EROs 019-6951, 6853, 6928, and 6963**

Ontario Headwaters Institute strongly advises that a series of postings on the Environmental Registry of Ontario as listed above and below and which seek to replace existing permitting requirements focused mostly on water with self-listing under the Environmental Activity and Sectoral Registry, should be withdrawn.

The postings are:

- ERO 19-6951, which streamlines the already streamlined permit-to-rule framework;
- ERO 19-6853, streamlining water takings for construction site dewatering and foundation drains;
- ERO 19-6928, which streamlines stormwater management; and
- ERO 19-6963, streamlining waste management systems.

Let's be clear. Nothing has been "streamlined": this is another withdrawal of environmental safeguards from a government that tried to suspend the Clean Water Act in special by-law areas; tore up the protocols on how significant wetlands might be protected; has changed the Conservation Authorities Act about 5 times, removing responsibilities and not assigning them elsewhere; and recently had to backtrack on its attempt to poach protected land for sprawl development.

In this latest episode of making Ontario Open for Business, the government seeks to make it easier for some organizations to release stormwater, de-water construction sites, and release items such as asbestos, bio-medical waste, hazardous water, and liquid industrial waste into our receiving waters.

If the four proposals go through, pollution and impacts on human health may be so pervasive that they may make the Walkerton Disaster look like a local picnic.

In addition, the shift to voluntary listing on the Environmental Activity and Sectoral Registry will not require posting on the Environmental Registry, so the public won't know what is being dumped into our water, and there is no requirement to update Conservation Authorities about dewatering, from which silt could plug wetlands or cover spawning areas for aquatic species.

And here is a significant tell. If the proposal had any meritorious intent, it might commit to more monitoring, including remote sensors and the public availability of data, and allow for both criminal sanction and for anybody downstream to sue for adverse consequences coming from upstream.

The government needs to stop treating the public as fools, and certainly not use us as guinea pigs for chemical experiments. All four postings must be withdrawn.

Sincerely,

*Andrew McCammon*

Executive Director