Proposed exemption to the Environmental Assessment Act and a new policy under the Provincial Parks and Conservation Reserves Act for projects in provincial parks and conservation reserves - Comments

ERO number 019-1804

Ministry of the Environment, Conservation and Parks

To: Cindy Batista

Re: Proposed exemption to the Environmental Assessment Act and a new policy under the Provincial Parks and Conservation Reserves Act for projects in provincial parks and conservation reserves -

**ERO number 019-1804**

Dear Cindy Batista,

I appreciate that the Ministry of the Environment, Conservation and Parks is looking into updating its almost 50-year-old environmental assessment (EA) program, while stipulating that:

“The following principles guide all aspects of the planning and management of Ontario’s system of provincial parks and conserve reserves:

* **maintenance of ecological integrity shall be the first priority and the restoration of ecological integrity shall be considered**
* opportunities for consultation shall be provided”

At the same time:

“The ministry is proposing to remove the requirements under the EAA for provincial parks and conservation reserves, allowing PPCRA to be the primary source of guidance.

The new policy will allow Ontario to focus its resources on projects with higher potential environmental impact. We will reduce delays on projects that matter most to Ontarians, while maintaining strong environmental oversight.”

Ontario Provincial Parks and conservation reserves are critical for the overall protecting of Canada biodiversity and species only found in Ontario.

As Ontario population is growing, the pressures on these precious natural areas have increased enormously. Many provincial parks are heavily overused, understaffed, underfunded and in need of management of public use.

The projects involving restoration of ecological integrity are overdue to prevent decline of biodiversity and/or reaching of tipping point in some particularly heavily used locations.

As climate change and biodiversity crisis are advancing, these sensitive natural areas require not less but more scrutiny which still can be done very efficiently.

Recommendations:

1. Ontario must advance the principles and best practices of environmental assessment law and not remove the ability of government to consider environment, economic and social changes which are inherent to development.

2. The proposed Environmental Impact Assessment Policy is not a sufficient replacement for Environmental Assessment law. EA considerations & commitments to consult the public and Indigenous communities should be legally enforceable, and not set out in a guiding, policy statement.

It is critical now to make a forward looking decision regarding our provincial parks and conservation reserves.

With increase user demands and climate/biodiversity crisis, we need a process that is superior in all aspects to support maintenance/enhancement of ecological integrity to be the first priority.

Yours sincerely