



**November 21, 2021**

**Attention: Ministry of Environment and Climate Change**  
**Re: ERO 019-4189**  
**Clarifying the authority to change the classes of projects to which a class environmental assessment process applies**

**Pertaining to: Bill 13: Supporting People and Businesses Act, 2021, Schedule 10**  
**Environmental Assessment Act**

The following is Gravel Watch Ontario's (GWO; gravelwatch.org) submission in response to the request for comments on Bill 13 which was posted on the Environmental Registry, October 7, 2021. This submission relates to the above noted Schedule 10 of Bill 13.

## **ABOUT GRAVEL WATCH ONTARIO**

Gravel Watch Ontario is a province-wide coalition of citizen groups and individuals that acts in the interests of residents and communities to protect the health, safety, quality of life of Ontarians and the natural environment in matters that relate to aggregate resources.

GWO recognizes the obligation to protect agricultural lands, water resources and the natural environment, all of which are essential for building a climate-resilient Ontario for future generations. GWO works with and on behalf of our members and communities throughout the province to advocate that policies regulating aggregate extraction not result in permanent loss of farmland or rural landscape amenities and do not damage the integrity of the water resources supplied by the rural landscape. Gravel Watch Ontario has commented on government planning and aggregate policies for over 15 years.

Highlighted below is the intended purpose of Bill 13, Schedule 10 followed by identification of GWO's concerns and recommendations.

**Bill 13, Schedule 10 – Environmental Assessment Act**  
**Ministry of Environment and Climate Change**  
**Clarifying the authority to change the classes of projects to which a class environmental assessment process applies**  
**ERO #019-4189**

**Proposal Summary:**

- contains two amendments considered ‘minor’ related to Ontario’s EA Modernization Initiative

**GWO Concerns:**

- lack of definition regarding what constitutes ‘minor’ amendments
- Ontario government’s EA processes are ineffective to address:
  - the current global context regarding climate change
  - cumulative effects stemming from increasing pressures for industrial development
- amendments are regressive by rolling back the following:
  - exempting forestry operations from EAs,
  - reducing the requirement for all public projects to undergo a comprehensive EA,
  - identifying a small number of projects for the revised Comprehensive List, and
  - changing the classes of undertakings to which class environmental assessments apply.
- continued de-evolution of Ontario’s environmental laws coupled with lack of public oversight jeopardizes the sustainability of Ontario’s resources and is contrary to the public interest as stated in the Environmental Assessment Act, i.e.  
“the betterment of people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment.”

**GWO Recommendations:**

- update the current EAA to reflect sustainable development principles
- cancel the amendments to the EAA and focus on higher level reforms of the EA process rather than roll back existing EA requirements
- fix the gaps in the current EA process regarding climate change and the cumulative effects of projects in the same geographic area
- provide intervenor funding to facilitate public participation
- establish climate change criteria related to gas emissions and the implications of carbon storage to determine whether particular undertakings should undergo an EA
- develop performance indicators and collect baseline data for systematic review and monitoring of climate changes
- require mandatory and thorough regional and cumulative effects assessments
- enhance investigation, enforcement and penalty provisions under the EAA