



Ontario
Home Builders'
Association

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May 5, 2023

EA Modernization Project Team
Environmental Assessment Modernization Branch
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RE: Moving to a Project List Approach Under the Environmental Assessment Act (ERO # 019-4219)

In January of 2022, OHBA provided the below comments on ERO #019-4219. Recognizing the proposal has been reposted with additional information, OHBA has provided further comments below.

January 25, 2022

The Ontario Home Builders' Association (OHBA) appreciates the opportunity to provide comments regarding the *Environmental Registry (ERO) posting # 019-4219*. We understand that the purpose of this initiative is to provide clarification by the *Ministry of Environment Conservation and Parks (MECP)* by moving to a list of projects under the *Environmental Assessment Act (EAA)* that require a comprehensive *Class Environmental Assessment (EA)*. The ERO posting does indicate that this will be implemented subsequently by regulation.

OHBA continues to support provincial actions which streamline processes and approvals to facilitate the implementation of infrastructure required to support housing availability in the province. This initiative represents the province's ongoing work to modernize the environmental assessment program.

OHBA understands that the current intent of the *MECP* initiative is to propose regulations to move to a project list approach which was first made in July 2020 when the *EAA* was amended under the *COVID-19 Economic Recovery Act, 2020*, along with many other proposed changes to modernize the *EAA*. The project list approach means that projects that require a comprehensive *EA* (previously known as an individual *EA*) will be listed in the regulation rather than being based mainly on who is proposing the project. Further, OHBA understands the motivation for a project list approach is to better align with those of other jurisdictions in Canada and help bring in line some thresholds with those of the federal government in certain sectors.

Pending approval of these proposed regulatory changes, most project types that currently require a comprehensive *EA* will continue to need one, but some projects would instead follow a more streamlined process. As outlined in the *ERO* posting, the *MECP* is proposing that a number of projects would move to a project list approach where a complete *Comprehensive EA* would be required prior to implementation.



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As OHBA understands these relate to projects including electrical transmission stations, hydroelectric and generating facilities, and transmission lines; waste management including landfill sites, changing a landfill to increase the total waste disposal volume, and excavations that could increase the total waste disposal volume; hazardous or liquid industrial waste, and advanced recycling projects; transit, highway, railway, and waterfront initiatives. The preparation and circulation of such a project list as soon as possible is of importance to our industry and consulting team. OHBA encourages the *MECP* to finalize the project list for review and input by our industry representatives.

In general, OHBA feels that the streamlining of processes related to projects that would require a complete and comprehensive *Class EA* would be of benefit to the development industry. Alternatively, the approval processes for those infrastructure projects that would follow a more streamlined approach would certainly support certain industry initiatives. OHBA will continue working with the *MECP* in this regard as part of the upcoming *Class EA* modification discussions, particularly regarding the integration with planning processes and the private sector's implementation of typical projects subject to the *Class EA* process. The list needs to be developed and finalized expeditiously and we encourage *MECP* staff to conclude the necessary work without delay.

In this regard, OHBA requests that the *MECP* expedite the *Municipal Class EA* updates that are currently being finalized and proposed to be issued prior to moving to a project list approach. This together with the proposed amendments will particularly assist with eliminating process duplication which we feel will expedite the delivery of homes beginning this year.

OHBA looks forward to the continuation of its working relationship and discussions with *MECP* staff to gain efficiencies related to the necessary approval processes to project implementation and the delivery of housing supply.

May 5, 2023

OHBA is glad to see the Ministry consider more focused environmental approval processes as part of this review. The Ministry has proposed changes to designation of rail, multi-lane highways, electricity transmission and waterfront projects. These initial areas of focus will help ensure that critical transportation and utility infrastructure move ahead in a timely fashion. These types of infrastructure projects underpin housing supply and will help new home buyers save time and money, while ensuring more predictability for project proponents. OHBA strongly welcomes these proposals.