

Submitted online via the Environmental Registry of Ontario

**ERO 019-1712 Environmental assessment modernization: amendment proposals for Class Environmental Assessments**

The Ontario Society of Professional Engineers (OSPE) is the advocacy body and voice of the engineering profession. Ontario currently has over 85,000 professional engineers, 250,000 engineering graduates, 6,600 engineering post-graduate students and 37,000 engineering undergraduate students.

OSPE is pleased to present the following submission concerning **Environmental assessment modernization: amendment proposals for Class Environmental Assessments**.

OSPE has focused its comments in the following areas:

**Focus on Higher-Risk Projects**

OSPE supports the need to better align study requirements with environmental impact, while reducing duplication. This means focusing on obtaining Class EAs for high risk projects.

Projects with a low potential for environmental impacts, or where the impacts are assessed through an environmental permit (e.g. ECA) or another planning process (under the Planning Act) having generally equivalent technical study and public consultation requirements, should be exempted from Class EA's.

**Streamlining the process and reducing duplication**

OSPE agrees with the need to ensure consistent requirements. OSPE agrees with the notion of granting the Minister authority to require a comprehensive (individual) EA or impose conditions on a streamlined project on his or her own initiative, within a time-limited period.

**Part II Order Requests**

OSPE agrees with the need to reduce the lengthy process regarding Part II Order Decisions. OSPE believes that the Minister should take action if there is a potential for a negative impact on a matter of provincial importance that relates to the natural environment, has cultural heritage value or interest, or regards a constitutionally protected Aboriginal or treaty right.

**Require technical studies to be conducted, signed-off and peer-reviewed by licensed engineering practitioners only**

Licensed engineering practitioners, such as professional engineers, are legally required to ensure public safety, as their highest priority, and are accountable for the advice they provide. Given the public safety aspects of EAs, OSPE recommends that only licensed engineering practitioners, and especially professional engineers, be allowed to conduct certain aspects of EAs (e.g., air and noise emissions). Such a requirement would also initiate practice guides to be developed within professional bodies, and perhaps also stipulations of more specialized requirements (e.g., MSc,

or higher) to ensure that EAs in Ontario are rigorous; in the long run this would save the proponent and the province both time and money.

### **Balance timeline reduction with strong environmental oversight**

OSPE notes that the proposal to exempt certain projects from the requirements of the Environmental Assessment Act, subject to certain conditions to be set out in a future regulation, has the potential to diminish the environmental protections that would otherwise be in place. When crafting those conditions, OSPE urges the Ontario Government to recognize the pace of change and to give careful consideration to ensuring that current environmental policies, new conditions in the study area, new engineering standards and new alternatives or mitigation measures are taken into account.

### **Explicitly consider sustainability and climate change mitigation**

OSPE is pleased to see climate change mitigation addressed in the proposed changes to the Municipal Class EA Manual. OSPE encourages the Ontario Government to explicitly embed consideration of climate change mitigation and to emphasize sustainability as a key factor in decision-making as it moves forward with Class EA updates and related aspects of environmental assessment reform.

### **Ensure Proper Indigenous Consultation**

Proper Indigenous Consultation is a duty of the Ontario Government and should therefore always be a priority. This means that the government should allocate enough time and funding to ensure that Indigenous peoples are properly consulted. This will reduce delays and save money to the taxpayer in the long run.

Sincerely,



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