ONTARIO SOCIETY OF PROFESSIONAL ENGINEERS

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Environmental Assessment Modernization Branch
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To Whom it May Concern,

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. The engineering profession's commitment to safeguarding the public interest and protecting our natural assets, and in this instance, there is no exception.

Ontario is taking continued action to modernize its environmental assessment process to reflect best practices that lead to environmental benefits and result in unnecessary cost for critical infrastructure projects. As part of modernizing the EA process, the Ontario Government is proposing changes that allow more projects to follow a streamlined EA process.

Below are some considerations from OSPE's Energy Task Force.

General Considerations

Ontario is proposing regulations and related actions to move toward a project-list approach for projects that will require a comprehensive environmental assessment under the Environmental Assessment Act, while continuing to ensure environmental oversight and robust consultation.

Environmental assessment is a critical process that helps us understand the potential environmental impacts of human activities before they are carried out. This assessment is a valuable tool for decision-making and policy development, allowing us to identify potential environmental risks, understand the potential consequences of our actions, and develop strategies to mitigate any adverse effects.

The importance of environmental assessment cannot be overstated. It helps us to identify and understand the potential environmental impacts of our actions, enabling us to make informed decisions about how to proceed. This is especially crucial in situations where there are competing interests, such as economic development versus environmental protection. By conducting an environmental assessment, we can weigh the potential benefits and drawbacks of different courses of action and make informed decisions that balance both human and environmental needs.

Environmental assessments are also critical for ensuring compliance with environmental laws and regulations. Many countries require environmental assessments to be carried out before certain types of projects can be approved, such as mining or construction projects. These assessments help to ensure that the project is completed in a manner that minimizes environmental impact and complies with environmental regulations.

Moreover, environmental assessments provide an opportunity for public participation in decision-making. Stakeholders such as local communities and environmental organizations are often consulted during the assessment process, giving them an opportunity to voice their concerns and offer input on potential environmental risks and mitigation strategies. This helps to ensure that decisions are made in a transparent and inclusive manner, taking into account the perspectives and needs of all stakeholders.

In summary, environmental assessment plays a critical role in ensuring that human activities are carried out sustainably and with minimal harm to the environment. It is a valuable tool for decision-making, compliance with environmental regulations, and public participation in decision-making. As such, it is essential that environmental assessments continue to be carried out and given the importance and attention they deserve.

Failure to conduct a deep and thorough environmental assessment can have serious consequences for the environment, human health, and sustainable development. The effects of not completing a deep environmental assessment include:

1. Increased risk of environmental damage: Without a deep environmental assessment, there is a higher chance of overlooking the potential environmental impacts of a project. This can result in significant environmental damage, including pollution, habitat destruction, and loss of biodiversity.

2. Negative impact on human health: Environmental and human health are closely linked. If an environmental assessment is not conducted, human health can be negatively affected through exposure to toxic chemicals or contaminated water and air.

3. Legal and financial implications: Failure to conduct an environmental assessment can lead to legal and financial liabilities for individuals and companies. In many countries, it is mandatory to carry out an environmental assessment before starting any project that may have an environmental impact. Failure to comply with these regulations can lead to legal action, fines, and other financial penalties.

4. Increased social conflict: Projects that have not undergone a thorough environmental assessment may face opposition from local communities and environmental groups, leading to social conflict and delays or cancellations.

5. Reduced long-term sustainability: The lack of an environmental assessment can lead to short-sighted decision-making that does not consider the long-term sustainability of a project or activity. This can lead to negative environmental and economic impacts in the future.

Given the importance of environmental assessments for protecting both the public and the environment, it is equally important that a robust regulatory framework is in place to ensure those completing and signing off on environmental assessments are qualified and competent. Given there are well-documented and reported deficiencies in the capacity of Ontario’s

engineering regulator (Professional Engineers Ontario) to regulate the practice of professional engineering in the public interest. At this time, we at OSPE cannot support any loosening or relaxation of restrictions to fast-track environmental assessments until we have the proper regulatory oversight needed to protect both public trust and the environment.

Proposed Assessment Criteria

To determine the appropriate level of environmental assessment and consultation required for transportation and transmission corridors, the distance and magnitude alone should not be the sole deciding criteria. Instead, other factors such as sensitivity of the areas, proximity to interested parties and stakeholders, and potential environmental impact should also be considered.

For short distance projects that are less than 50 km and traverse highly sensitive areas such as conservation lands, wetlands, greenbelt, rich farmland, and aboriginal lands or are in proximity to many interested parties and stakeholders, a more detailed environmental assessment and consultation process should be followed.

On the other hand, for long distance projects that traverse undeveloped bushland or wasteland with little or no impact or proximity to few interested parties and stakeholders, a streamlined approvals process with strict timelines for consultations, assessments, and reports could be considered. This is particularly relevant for new long-distance transportation or transmission corridors to service new mining or generation projects sited in remote areas.

It is important for the Ontario Government to cautiously explore this idea, considering the potential environmental impact of sensitive projects, such as the proposed Bradford Bypass linking the 400 and 404 expressways.

Energy Considerations for Critical Infrastructure

In meeting Ontario's future electricity and heat requirements, it is crucial to consider other parts of "critical infrastructure" beyond traditional generating stations. Infrastructure required for combined heat and power (CHP) operation, such as thermal energy storage and district heating or thermal networks, could play a vital role.

By incentivizing the development of CHP plants over traditional electricity-only generating stations, the industry could be nudged towards more efficient practices. For instance, by transitioning the Greater Toronto Area to thermal networks from various sources, including CHP plants, instead of just switching from natural gas boilers to heat pumps, the province could save up to $48 billion on new generation and raise power plant efficiency from approximately 30% to almost 90%.

Ontario needs a clear vision for a more efficient and integrated energy solution, one that will also expand job opportunities for multiple engineering disciplines and various trade workers. The Ontario Society of Professional Engineers' Energy Task is willing and able to assist the Ontario Government as a resource to achieve this goal.

OSPE believes that this matter is of a sensitive nature and appreciates the necessity of creating environmental resiliency of Ontario. OSPE welcomes the opportunity to discuss this matter with

you. If you have any additional questions please contact Paola Cetares, Public Affairs Manager, pcetares@ospe.on.ca.

Sincerely,

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