

November 10, 2020

Submitted online via the Environmental Registry of Ontario

**ERO 019-2377 Proposed Project List for comprehensive environmental assessments under the Environmental Assessment Act (EAA)**

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 **Proposed Project List for comprehensive environmental assessments under the Environmental Assessment Act (EAA)**

OSPE has focused its comments in the following areas:

**Need for clarity and predictability**

OSPE supports the need to better align study requirements with environmental impact, while reducing duplication.

The environmental assessment process should be clear, consistent, and predictable. Organizations developing critical infrastructure in Ontario must be able to undertake a project with a full understanding of the requirements that they will need to meet to deliver these projects.

Therefore, it is extremely important that the Government of Ontario provide more clarity as to the criteria used to classify certain projects.

**Federal and Provincial Alignment**

Every effort should also be made to harmonize federal and provincial requirements. Therefore, the Province should mirror the requirements set by the federal environmental assessment process. If a project triggers both a federal and provincial process, only a single assessment should be required.

**Environmental Factors Used to Prepare the Proposed List**

While the proposed list of projects subject to comprehensive assessment is well chosen, OSPE believes that the criteria used to prepare the proposed list lacks clarity and detail. For example, recognizing that some type of quantifiable metric is best suited to determining inclusion, the length, for example, of a highway, rail line, or hydro corridor is not necessarily the most appropriate criterion for determining potential environmental impact.

A longer project that does not touch on environmentally significant geographical areas may not require such detailed assessment, while a shorter project that directly affects a significant natural area may require more detailed assessment.

**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.

**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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