



**Modernizing Ontario's
Environmental Assessment Program:
Discussion Paper**

May 25, 2019

Background

The Environmental Assessment Act sets out the framework for the environmental assessment (EA) program in the Province. The EA program is a key component of environmental planning decision-making in Ontario, The program requires the study and documentation of potential environmental effects a project may pose. The EA process also facilitates consultation with parties affected by a project.

The City of Brampton supports the provincial efforts to modernize Ontario's environmental assessment program. The City looks forward to a facilitative framework that protects human health and the environment, and is grounded in established science.

The Province seeks input that will help to inform a modern framework for environmental assessment that:

- ensures better alignment between the level of assessment and level of environmental risk associated with a project;
- eliminates duplication between environmental assessment and other planning and approvals processes;
- finds efficiencies in the environmental assessment process and related planning and approvals processes to shorten the timelines from start to finish: and
- goes digital by permitting online submissions

City of Brampton welcomes an opportunity to provide comments.

Detailed Comments

Ensure better alignment between the level of assessment and level of environmental risk associated with a project

What kind of projects should require environmental assessment in Ontario?

- The City of Brampton supports efforts to ensure a better alignment between the level of assessment and level of environmental risk associated with a project. With an exception of operations and maintenance projects, all projects in the Province should require some level of environmental assessment. At the same time, the city recognizes opportunities to improve service standards to reduce delays.

Are there some types of projects where a streamlined assessment process is appropriate?

- In the City's opinion municipal roads, water, wastewater and transit projects should all undergo a streamlined environmental assessment process, which would reduce the regulatory burden and improve the efficiency.

Eliminate duplication between environmental assessment and other planning and approvals process

What could a one-project-one-review process look like for projects in Ontario subject to both provincial and federal requirements?

- It is the City's opinion that the Federal and Provincial permit reviews should be coordinated through one point of contact. Such coordination could ensure better alignment, eliminate duplication, and find efficiencies.

Can you identify any other examples of provincial processes that could be better integrated?

- The City is supportive of eliminating duplication between environmental assessment process and other planning and approvals processes. Examples of provincial processes that could be better integrated include Endangered Species Act permits and Conservation Authority permitting process. The Province may consider integrating the Ministry of Infrastructure Public Work Class EA process for land disposal with other EA process.

What other actions can the ministry take to eliminate duplicative or redundant processes or approvals?

- The City has no further comments.

Find efficiencies in the environmental assessment process and related planning and approvals processes to shorten the timelines from start to finish

What could a coordinated one-window approach look like for Ontario projects?

- The City has no comments.

Can you identify any areas in the environmental assessment process that could be better streamlined with the municipal planning process or with other provincial processes?

- A more coordinated approach for Planning and Environmental Assessment processes can help eliminate duplication between environmental assessment process and other planning and approvals processes.

What advantages and disadvantages do you see with the ministry's environmental assessment process being the one-window for other approval/permit processes?

- In City's view, this may shorten the overall review time by agencies.

What areas of the environmental assessment program could benefit from clearer guidance from the ministry?

- The City has no comments.

What other actions can we take to reduce delays and provide certainty on timelines for environmental assessment?

- Delays in the approval process often result in lost opportunities, and increased costs to municipalities and other stakeholders. The City recommends the following actions:
 1. Simplify public notification process preferably replacing traditional newspaper advertising method by digital method for efficiencies
 2. Provide clear guidelines as to who can make a Part II Order requests and on what basis to avoid frivolous requests
 3. Define clear timelines for Minister's review of Part II Order requests preferably total time not more than 3 months from the date of Part II Order Request. The entire EA process can be time-regulated similar to Transit EAs

What are the advantages and disadvantages of using a sector-based terms of reference?

- The City has no comments.

Are there other ways we could improve our review timelines?

- In the City's opinion the province should consider regulating a timeline for the Minister's review of Part II Order requests. This change would provide certainty and improve the planning process; however, the regulated timelines would need to take into account the volume of material staff would be required the review.

Go digital by permitting online submissions

How would you like to be consulted on environmental assessment projects?

- It is the City's opinion that effective and meaningful public consultation and participation in the EA process depends on ease of access to timely, accurate and adequate information. Technology, such as email and online registry may be leveraged to encourage and facilitate public participation and input.

Would an online environmental assessment registry be helpful for you in submitting an environmental assessment or accessing environmental assessment information?

- The City of Brampton supports an online environmental assessment registry for submitting an environmental assessment or accessing environmental assessment information. However, individuals accessing the information should contact the proponent for any updates.

What type(s) of environmental assessment project information would you like to access online?

- In the City's opinion the following types of environmental assessment project information should be accessible online: technical studies, preferred alternative, construction cost, and public consultation record.

Are there any existing online tools that would be appropriate to use for environmental assessment information?

- Project information can be posted online on the project webpage