

Sent via e-mail to: minister.mecp@ontario.ca

May 30, 2023

The Honourable David Piccini
Minister of the Environment, Conservation and Parks (MECP)
College Park, 5th Floor
777 Bay Street
Toronto, Ontario M7A 2J3

Dear Minister Piccini:

I am writing to you today regarding the proposed changes to the Environmental Assessment (EA) system and the Municipal Class EA that the government has posted for consultation. I appreciate the opportunity to provide this input.

AMO's Executive Committee considered the changes at its recent meeting and the members supported the government's proposal to revoke the Municipal Class EA and replace the EA with a designated project list to set out which types of projects must complete a comprehensive or streamlined EA as proposed. The Executive Committee believes that this will provide proper recognition to municipal Official and Master Planning processes as the appropriate processes to consider options and alternatives for municipal projects and must be recognized by the Ministry.

In considering the proposals, AMO's Executive Committee made several other recommendations to the Ministry to improve the ability of municipalities to build projects expeditiously, ensuring support of our communities, stakeholders, and other partners. These are:

- That the Ministry work with Ministry partners including the Ministry of Indigenous Affairs to provide thorough and detailed guidance to municipal governments to enable municipalities to appropriately consult with Indigenous partners in a way that fulfills our responsibilities for the Duty to Consult;
- That the Government of Ontario ensure that Indigenous communities have the capacity to appropriately respond to consultation, including financial support, so that municipal projects receive timely input;

- That any projects that must be approved by the Minister under the new process such as projects in a designated project list, must be subject to hard timelines for final approval of no more than 35 days after submission to be approved, approved with conditions, or denied giving proponents certainty; and
- That MECP work with the Municipal Engineers Association (MEA), Regional Public Works Commissioners, Good Roads, AMO and other municipal organizations so that MEA can develop detailed guidance for municipal project evaluation to ensure consistency across Ontario and to aid municipal governments.

AMO appreciates the Minister's commitment to reform the EA process and your understanding that the current process has driven increased timelines and costs for municipal governments across the province. AMO and other municipal organizations have long called for changes to ensure appropriate scrutiny is given to projects at the appropriate time and we believe that the Ministry's proposals, with the additional recommendations made herein will ensure a consistent and cost-effective process that protects the environment and the ability for input from affected groups.

AMO thanks you for your efforts and welcomes the opportunity to continue partnering with the government to build a better Ontario.

Sincerely,



Colin Best
AMO President
Councillor, Region of Halton

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing
Serge Imbrogno, Deputy Minister, Ministry of the Environment, Conservation and Parks