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Proposed Amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario: ERO 019-0961

Introduction

[BurlingtonGreen Environmental Association](#) is a citizen-led, nonpartisan, registered charity in the City of Burlington. We are pleased to submit our comments on *Proposed Amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario: ERO 019-0961*. BurlingtonGreen regularly provides comments and recommendations to the government on issues pertaining to environmental protection and environmental policy. We believe that all levels of government must work to protect Canadians against the growing threat of our climate change and species extinction.

Climate Change and Our Forests

Climate change is the biggest challenge facing Ontarians. To achieve progress on climate action, climate change mitigation must drive all government decision-making. This calls for a complete transformation of the current decision-making framework, placing climate action as a top priority. A shift from the traditional framework to one that prioritizes our impact on the environment is necessary. A nested circle framework recognizes that social and economic activity occurs within ecological limits.

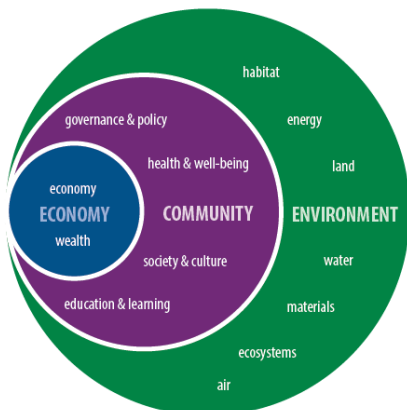


Photo credit: Future Oxford Community Sustainability Plan

BurlingtonGreen recognizes the economic contribution of the forest sector to the Province’s economy. At the same time, we are facing new climate realities. The Intergovernmental Panel on Climate

Change's (IPCC) most up to date recommendation is a 50% carbon reduction by 2030 and achieving carbon neutrality by no later than 2050. Should we fail to meet our GHG emission commitments, we are just 10 years away from natural tipping points and runaway climate change. Now is not the time to sweep environmental checks and balances under the carpet.

The Threat to our Species and Habitats

A critical ecological issue we are currently facing is what scientists have termed a sixth mass extinction of plants and animals on Earth. But unlike past extinctions, this one is being caused by human activity. According to the [Centre for Biological Diversity](#), "as many as 30 to 50 percent of all species are possibly heading toward extinction by mid-century", and since "most of biodiversity's benefits take place at a local level, conserving local populations is the only way to ensure genetic diversity critical for a species' long-term survival". This means that wherever we are thinking of introducing human activity, such as logging, it is vital that a comprehensive environmental impact assessment be completed to determine whether any at-risk species are involved, before approval is given on a proposed project.

Now more than ever before, it is critical that we ensure the need of the forest sector for growth is governed within the parameters of responsible environmental stewardship in order to achieve a truly sustainable model for this sector.

BurlingtonGreen Comments on Proposed Amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario: ERO 019-0961:

While we support making government efficient and the eliminating unnecessary duplication, we strongly believe that the Environmental Assessment Act should be the overarching piece of legislation that informs and regulates all activity that has the potential to impact our environment. We object to any weakening of the EAA and feel that it should act as a check and balance to ensure that required policies, activities and reporting are in place elsewhere. If an EAA requirement is mirrored in another piece of legislation or policy, it should be a simple matter of cross-referencing the EAA requirement in the reporting – this is not duplication; it is due diligence and ensures that government Ministries and private sector enterprises are compliant with environmental legislation. The danger in removing components of the EAA and placing them solely under the jurisdiction of other Ministries and legislation is that environmental oversight and assessment will become fragmented and too difficult to monitor and evaluate. In light of the recent report by the provincial Auditor General, which was very critical of Ontario's performance on the environment file, we believe it is more important than ever that Ontarians have the assurance of a strong and comprehensive Environmental Assessment Act to safeguard our increasingly fragile ecosystems. We strenuously object to the current government's view of environmental protections as simply 'red tape', and do not support the removal of them as necessary to a competitive economy. The Environmental Assessment Act must be a robust and comprehensive piece of legislation that holds government ministries and private sector concerns accountable to the legislature and the public, and that safeguards Ontarians' right to a healthy environment.

Conclusion

We urge the Government of Ontario to put forward a sustainable, forward-looking strategy for managing our forests that carefully balances support for our industries and communities with improved,

not weakened, conservation opportunities. This must be coupled with carefully considered and appropriate improvements, where needed, to the legislation, policies and processes designed to support and implement a forest strategy. By no means should changes include the elimination of sections of the Environmental Assessment Act.

We must ensure that the systems and resources designed to support our forest sector recognize the threats facing our species and work to address them, and that audit and reporting requirements ensure full disclosure and transparency. It is time to acknowledge the need for and a commitment to a sustainable future for all, and a shift from a “Business as Usual” model that is unsustainable to a model that prioritizes action on climate and species preservation, thereby safeguarding the health and well being of our habitats and biosphere, now and for future generations.

Sincerely,

BurlingtonGreen Advocacy Team
BurlingtonGreen Environmental Association

CC: Jane McKenna, MPP, Burlington
John Yakabuski, Minister of Natural Resources and Forestry