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Ministry of Natural Resources
Policy Division
Modernizing Approvals
300 Water Street, Floor 5
Peterborough Ontario
K9J 8M5

**Re: EBR Registry number 011-6751
Modernizing Approvals**

Dear Sirs:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization with a focus on healthy river ecosystems all across Ontario. ORA members represent numerous organizations such as the French River Delta Association, Vermilion River Stewardship, CPAWS-Ottawa Valley, Friends of Temagami, Paddle Canada, Whitewater Ontario, Mississippi Riverwatchers, along with many other stewardships, associations, and private and First Nations citizens, who have come together to support healthy river ecosystems in Ontario and to ensure that development affecting Ontario rivers is environmentally, ecologically and socially sustainable.

ORA agrees that efficiencies of permitting and approvals, and streamlining of process, can be made in a way that benefits both the client, stakeholders and Ministry of Natural Resources (MNR), without compromising public health and safety, or the sustainability and health of the environment and natural resources. ORA wishes to make the following recommendations with regard to modernization of approvals:

1. Full Cost Recovery – Fee for Service

Fee for service is an essential component for cost recovery, and for maintaining the highly important scientific/research/fisheries aspect of MNR. ORA agree that the full range of costs and benefits to natural resources and to Ontarians must be considered in determining feasibility and appropriate fees, and to ensure the wise use and protection of Ontario's natural resources.

All costs related to a service should be charged back to the applicant/proponent, including the time consuming work of facilitating and advising on all aspects of applications, permitting, environmental assessments, compliance and enforcement.

To take it even one step further, ORA feels very strongly that all associated studies should not be undertaken or arranged by the proponent, but be performed or

commissioned by MNR Science and Research staff, and all costs be charged back to the proponent. This would ensure studies are conducted with the highest of integrity, results are reliable, and best practices are adhered to.

2. Electronic Processing of Applications and Permits

- a. ORA agree that modern technology is a good idea to streamline paper-based systems wherever possible.
- b. Activities posing no or low impact/risk to public safety and natural resources are fine to streamline and register on-line; however, medium or high risk development should continue to have full involvement of agency staff.
- c. Compliance and Enforcement follow-up will be vital to any automated system.

3. Stay the Same

- a. Any permit/approval/application that poses a medium to high risk to public health and safety, or natural resources must undergo full agency involvement and public consultation.
- b. Medium to high risk activities must continue to have follow-up for adaptive management, compliance and enforcement.
- c. Most waterpower, mining, industry and forestry applications/permitting would pose a moderate to high risk to natural resources, public safety and the local economy, and must continue to trigger the highest level of Ministry involvement, monitoring, enforcement and public consultation.

4. Additional Considerations

- a. Streamlining of approvals should result in an overall net benefit to the environment, ecosystem, and people of Ontario.
- b. Assessment of net benefit must take into account the environmental, ecological, social and economic impacts, both positive and negative.
- c. Defining terms such as **“significant”**, **“low, medium and high impact”**, is key to making an accurate evaluation of risks.
- d. Ministries must place the highest priorities on protection of public safety, the environment and natural resources – not on profits for corporations.
- e. Clarity, transparency and consistency in approval requirements, processes and terminology are essential, both to applicants and to the public, stakeholders and First Nations. These measures will ensure trust and confidence in the entire process.
- f. Approval and permitting processes must also take into account the possibility that the activity may not be approved.
- g. ORA is requesting an on-line Ontario registry where all applications, permits and correspondence related to proposals can be accessed by the public at any time – similar to the CEEA Registry.
- h. Adaptive management of policy and process is important, however, public consultation must be a key component in this process.
- i. Priorities in the standard risk evaluation should assess:
 - i. Public health and safety risks
 - ii. Environmental and Natural Resources risks

- iii. Cumulative Effects – must consider other uses
- iv. Social and cultural uses of natural resources
- v. Climate change to consider long-term viability
- vi. Economic risks to local and regional stakeholders
- vii. Public expectations of government
- j. Risks to corporate profits should not be a priority.

5. Retaining Current Application and Review

The current approach to reviewing and approving medium to high risk developments must maintain full Ministry involvement. This is an area where user fees would be highly appropriate to help sustain these essential government services.

The overarching approach to streamlining of approvals should result in an overall net benefit to the environment, natural resources, and people of Ontario. This streamlining approach must not be designed to skip important environmental and public safeguards, or to increase profits for developers.

ORA suggests that these changes could be very complex and far reaching, and requests that once all comments and suggestions have been incorporated into a policy document that it be posted again on the Environmental Registry for further comment.

ORA looks forward to being closely involved in MNR's further efforts to modernize, strengthen and make efficiencies to permitting and approvals of natural resource activities.

Thank you for this opportunity to comment.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance

Cc: Honourable Michael Gravelle, Minister of Natural Resources – Minister.mnr@ontario.ca
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