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August 27, 1974.

Mr. Gar Mahood,  
Executive Director,  
Canadian Environmental Law  
Association,  
Suite 303,  
1 Spadina Crescent,  
TORONTO, Ontario. M5S 2J5

Dear Mr. Mahood:

You have asked for my comments on the Canadian Environmental Law Association's submission in response to the Green Paper on Environmental Assessment of the Ministry of the Environment.

Before commenting on CELA's response, I do think that the Ministry should be commended for affirming the necessity for environmental impact assessment procedures and I certainly hope that the necessary legislation will be introduced to provide for such assessments.

As counsel at one time to People or Planes, the public interest citizens' group which is pressing for a re-assessment of the need for the proposed Pickering airport, I have first-hand experience of some of the problems that citizens face when they attempt to have some influence on major social and environmental decisions which affect the quality of their lives. In my view, that influence is not adequate at the present time.

Mr. Gar Mahood

August 27, 1974.

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Citizens ought to have some input into the question of whether or not a project is necessary in the first place. Then they ought to be able to influence where a project will go.

In addition, the built-in bias against public participation, which comes from limited financial resources and from the lack of access to information and expertise, must be eliminated if a fair and just tribunal adjudication of environmental disputes is to be instituted. More specifically, CELA's recommendations for early notice of proposed projects, for funding for objectors, and for an independent Review Board would go a long way toward reducing the innate disparity between contesting parties. Moreover, any legislation should give any individual or group the status to object to any project, thereby initiating the assessment process (as recommended by the Canadian Bar Association).

I believe the Canadian Environmental Law Association's brief identifies many of the existing barriers to public participation. I sincerely hope that the Ministry of the Environment will give serious consideration to CELA's proposals before drafting its legislation.

Yours very truly,



Donald J. Wright.

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