

ENVIRONMENTAL POLICY-MAKING AND PUBLIC INVOLVEMENT IN CANADA

ADDRESS BY SHEILA TOOZE

FOR GREAT LAKES ACTION WEEK PARTICIPANTS

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GOOD AFTERNOON AND THANK YOU FOR JOINING US HERE AT THE CANADIAN EMBASSY TODAY. IT ISN'T VERY OFTEN THAT WE HAVE THE OPPORTUNITY IN WASHINGTON TO MEET A LARGE NUMBER OF FOLK WHO WORK DIRECTLY ON GREAT LAKES' ISSUES, AND I WOULD LIKE TO CONGRATULATE YOU FOR PARTICIPATING IN THIS "GREAT LAKES LOBBYING WEEK", AND IN PARTICULAR, I WOULD LIKE TO THANK JANE ELDER OF THE SIERRA CLUB FOR BRINGING THIS EFFORT TO MY ATTENTION.

IN FACT, IT WAS JANE WHO SUGGESTED THE TOPIC ON WHICH I HAVE VOLUNTEERED TO SPEAK TODAY. BEFORE I DO SO, I SHOULD EMPHASIZE THAT MY REMARKS ARE INFORMAL AND OFF-THE-RECORD, AS I HAVE NO PERSONAL EXPERIENCE IN THIS FIELD IN CANADA. ALSO, AS YOU WILL HEAR, "ENVIRONMENTAL POLICY-MAKING AND PUBLIC INVOLVEMENT IN CANADA" IS PART OF A DYNAMIC PROCESS, AND ALTHOUGH PERHAPS NOT MOVING QUICKLY ENOUGH FOR THE CANADIANS IN THE AUDIENCE, IT IS MOVING FORWARD AND IS CONSTANTLY CHANGING.

LET ME START WITH SOME OF THE BASICS. YOU SHOULD BE AWARE FROM THE OUTSET THAT THE CANADIAN AND U.S. POLITICAL SYSTEMS ARE VERY DIFFERENT, [LEADING TO IMPORTANT DIFFERENCES IN THE REPRESENTATIVE POLICY-MAKING PROCESSES AND THE MEANS WHEREBY THE INDIVIDUAL OR ORGANIZED PUBLIC CAN AFFECT IT.]

THE CANADIAN POLITICAL SYSTEM IS ORGANIZED AROUND THE PRINCIPLE OF PARLIAMENTARY RESPONSIBILITY, UNLIKE THE U.S. SYSTEM } WHICH, AS YOU KNOW, IS ORGANIZED ON THE SEPARATION OF POWERS AND } CHECKS AND BALANCES. IN CANADA, THE PRIME MINISTER IS THE LEADER OF THE POLITICAL PARTY HOLDING THE MAJORITY OF SEATS IN THE

HOUSE OF COMMONS, AND MUST RUN FOR ELECTION IN HIS LOCAL CONSTITUENCY JUST AS OTHER MEMBERS OF PARLIAMENT. THE PRIME MINISTER NORMALLY CHOOSES HIS CABINET FROM AMONG SITTING MEMBERS OF HIS PARTY IN THE HOUSE, UNLIKE THE U.S. SYSTEM IN WHICH THE PRESIDENT APPOINTS WHOMEVER HE WISHES TO CABINET POSTS. THE CANADIAN PRIME MINISTER AND HIS CABINET ARE DIRECTLY ACCOUNTABLE TO THE LEGISLATURE FOR THEIR ACTIONS AND THE GOVERNMENT CAN FALL IN THE EVENT OF A NO-CONFIDENCE VOTE IN THE HOUSE OF COMMONS. A COROLLARY TO THIS ACCOUNTABILITY IS THE REQUIREMENT FOR PARTY LOYALTY WITH RESPECT TO THE GOVERNMENT'S POLICIES AND PROGRAMS. IF MPS FROM THE GOVERNING PARTY VOTED AGAINST THE GOVERNMENT ON MAJOR ISSUES, GOVERNMENTS WOULD NOT SURVIVE FOR LONG. HENCE FINAL GOVERNMENT POSITIONS ARE ESTABLISHED IN THE PRIVACY OF THE CABINET AFTER WHICH GOVERNMENT BACKBENCH MPs ARE EXPECTED TO FALL INTO LINE.

THIS CONCEPT IS, OF COURSE, VERY DIFFERENT FROM THE U.S. LEGISLATIVE SYSTEM WHEREIN CONGRESSMEN TEND TO VOTE ON ISSUES WITH THEIR DISTRICTS IN MIND, RATHER THAN THEIR PARTY LEADERS, AND LEAST OF ALL THE PRESIDENT.

{ CANADIAN LAWS ARE USUALLY DEVELOPED WITHIN GOVERNMENT AGENCIES AND FORMULATED BY BUREAUCRATS IN RESPONSE TO THE POLICIES OF THE GOVERNMENT OF THE DAY. } ON OCCASION, POLICIES PROPOSED IN THE INTERESTS OF ONE MINISTRY MAY CONFLICT WITH THOSE OF ANOTHER. FOR EXAMPLE, OIL AND GAS DEVELOPMENT PLANS IN THE CANADIAN NORTH MET WITH SOME RESISTANCE FROM THE MINISTER OF THE ENVIRONMENT. THE DISAGREEMENT WAS HANDLED IN A TYPICALLY CONSTRUCTIVE CANADIAN FASHION: BOTH SIDES NEGOTIATED, COMPROMISES

WERE MADE, AND THE DEVELOPMENT PLANS WERE MODIFIED TO TAKE ENVIRONMENTAL SENSITIVITIES INTO ACCOUNT.

THE ORGANIZATION AND STRUCTURE OF THE CANADIAN FEDERAL GOVERNMENT HAVE IMPORTANT IMPLICATIONS FOR CANADIAN LOBBYISTS. IF AN INDIVIDUAL OR GROUP WISHES TO INFLUENCE THE DEVELOPMENT OF A POLICY OR LAW, OFTEN THE MOST USEFUL INITIAL OPPORTUNITY FOR IMPACT IS AT THE POLICY FORMULATION STAGE WITHIN THE BUREAUCRACY. (OPPORTUNITIES FOR INFLUENCE HAVE INCREASED IN RECENT YEARS AS THE DECISION-MAKING PROCESS RELIES MORE AND MORE EXTENSIVELY ON PUBLIC CONSULTATION AND INVOLVEMENT.)

many years closed shop. *

THIS PROCESS CAN WORK IN THE INTEREST OF BOTH THE GOVERNMENT AND THE AFFECTED CONSTITUENCIES. [ON THE ONE HAND, THE GOVERNMENT COULD BE SERIOUSLY EMBARRASSED IF IT WERE TO DEVELOP A POLICY WHICH WAS PATENTLY UNPOPULAR WITH THE MOST DIRECTLY AFFECTED GROUPS; ON THE OTHER, INTERESTED GROUPS HAVE A GENUINE OPPORTUNITY TO MAKE THEIR VOICES HEARD. THROUGHOUT THIS PROCESS THE EFFORT IS TO SETTLE DIFFERENCES BY COOPERATION RATHER THAN CONFLICT AND COMPETITION.]

ONCE A POLICY IS FORMULATED AND IS PRESENTED TO PARLIAMENT, THERE IS AGAIN OPPORTUNITY FOR INTERESTED CITIZENS AND GROUPS TO MAKE THEIR INFLUENCE FELT. [IN CANADA, AS IN THE U.S., ALL BILLS ARE CONSIDERED BY STANDING COMMITTEES IN THE HOUSE AND SENATE BEFORE THEY ARE VOTED ON IN THE CHAMBERS.

not many public deputations

AT THIS STAGE, PUBLIC HEARINGS ARE AGAIN HELD AND AMENDMENTS ARE FREQUENTLY ADOPTED IN RESPONSE TO PUBLIC COMMENT. OF COURSE, WELL-PREPARED AND WELL-ARGUED BRIEFS GENERALLY HAVE A GREATER IMPACT THAN VIEWS WHICH ARE MORE CASUALLY PRESENTED.

AT THE PROVINCIAL LEVEL, THE LEGISLATIVE PROCESS IS VERY SIMILAR, AND ANOTHER IMPORTANT DIFFERENCE TO KEEP IN MIND WHEN ASSESSING OPPORTUNITIES TO INFLUENCE CANADIAN ENVIRONMENTAL POLICY-MAKING IS THAT THE PROVINCES HAVE RESPONSIBILITY FOR LEGISLATION AND REGULATION WITH RESPECT TO NATURAL RESOURCES. THE FEDERAL GOVERNMENT, HOWEVER, PLAYS A MAJOR ROLE WHEN POLICY-MAKING INCLUDES AN AREA OVER WHICH IT HAS JURISDICTION, SUCH AS FOREIGN AFFAIRS * TRANS-BOUNDARY ISSUES LIKE ACID RAIN AND GREAT LAKES THEREFORE HAVE A FEDERAL LEAD IN AN AREA LARGELY UNDER PROVINCIAL JURISDICTION. THE FEDERAL GOVERNMENT ALSO HAS A SIGNIFICANT IMPACT ON POLICIES AFFECTING HUMAN HEALTH, EG., UNDER THE AUTHORITY OF THE CLEAN AIR ACT, AND ON THOSE INVOLVING INTER-PROVINCIAL MATTERS, EG., WATER AND AIR POLLUTION. BUT IT IS ESSENTIAL TO HAVE ACCESS TO THE PROVINCIAL DECISION-MAKERS, AS WELL AS THE FEDERAL LEADERSHIP WHEN WORKING TOWARDS POLICY FORMATION GOALS. KNOWING WHO'S WHO, AND HOW TO CAPTURE THEIR INTEREST, BECOMES VITAL.

IF I HAVEN'T MADE THE PICTURE CLEAR BY NOW, LET ME PUT IT BRIEFLY BY SAYING THAT THE EFFORT YOU ARE MOUNTING THIS WEEK IN WASHINGTON, D.C. WOULD HAVE TO BE ORGANIZED RATHER DIFFERENTLY TO HAVE ANY IMPACT IN CANADA, AND WOULD HAVE TO INCLUDE TORONTO AS THE POLITICAL CENTRE OF ONTARIO, AS WELL AS THE FEDERAL CAPITAL, OTTAWA.

OUR SYSTEMS ARE ALSO VERY DIFFERENT WITH REGARD TO THE ROLE OF THE COURTS. AS I POINTED OUT EARLIER, IN CANADA THERE IS NOT A SYSTEM OF CHECKS AND BALANCES BETWEEN EXECUTIVE BRANCHES AS IS THE CASE HERE. IN THE U.S., LEGISLATION AND REGULATIONS ARE FORMULATED BY TWO DIFFERENT ARMS OF THE GOVERNMENT, EACH OF WHICH DERIVES AUTHORITY FROM THE ELECTORATE BY SEPARATE PROCESSES. THERE IS THUS THE POSSIBILITY OF DEVELOPING REGULATIONS TO IMPLEMENT THE LAW IN A MANNER THAT WAS NOT INTENDED BY ALL THE LAWMAKERS. IN CANADA, THE SAME GOVERNMENT CONTROLS BOTH LEGISLATION AND THE REGULATION MAKING PROCESS. THEREFORE, UNLIKE THE U.S.A., IT IS HIGHLY UNUSUAL TO TURN TO THE COURTS TO CHALLENGE FINAL REGULATIONS.

IN CANADA, IT WOULD BE MORE DIFFICULT TO CONDUCT THE KIND OF CASE THAT GROUPS SUCH AS NRDC REGULARLY LITIGATE IN THE U.S. FOR SEVERAL REASONS. CANADIAN LAWS ARE USUALLY EXPRESSED IN MORE GENERAL TERMS THAN THOSE IN THE U.S. HENCE IT IS MUCH MORE DIFFICULT TO CHALLENGE A FEDERAL REGULATION IN CANADA ON THE GROUNDS THAT IT CONTRAVENES A CANADIAN LAW.

ANOTHER DIFFICULTY IS THAT CANADIAN LAW REQUIRES THAT CHARITABLE DONATIONS BE DISBURSED QUICKLY. THIS EFFECTIVELY REDUCES THE ABILITY OF CHARITABLE (I.E. TAX EXEMPT) ORGANIZATIONS TO ACCUMULATE LARGE WAR CHESTS. ALSO, THERE ARE NUMEROUS RESTRICTIONS ON THE USE OF CLASS ACTIONS IN CANADA WHICH FREQUENTLY MAKE SUCH SUITS IMPOSSIBLE. IT APPEARS THAT SPECIAL LEGISLATION WILL BE NEEDED BEFORE CLASS ACTIONS CAN BECOME A MAJOR LEGAL TOOL IN CANADA. FINALLY, MANY PROVINCES DO NOT ALLOW LAWYERS

TO ACT ON THE BASIS OF CONTINGENCY FEES, THUS MAKING IT DIFFICULT FOR INDIVIDUAL PLAINTIFFS TO LAUNCH LITIGATION AGAINST LARGE FIRMS WITH SUBSTANTIAL RESOURCES AND THE ABILITY TO DELAY SETTLEMENTS.

HOWEVER, SOME OF THESE ASPECTS ARE CHANGING IN CANADA WITH THE WORLDWIDE MOVE TOWARDS GREATER CITIZEN ACTION. IN THE PAST THE LEGAL PROFESSION HAS NOT GONE OUT OF ITS WAY TO SUPPORT CITIZEN ACTIVISTS. BUT OVER THE LAST 20 YEARS A NEW PUBLIC CONSCIOUSNESS HAS EMERGED AMONG SOME LAWYERS WHO NOW OPERATE LEGAL CLINICS AND STOREFRONT OFFICES. THE CANADIAN ENVIRONMENTAL LAW ASSOCIATION IS A GOOD EXAMPLE, AND PROVIDES SUBSIDIZED LEGAL SERVICES TO THOSE FIGHTING ENVIRONMENTAL LEGAL BATTLES. IN FACT, I'M SURE YOU ALL KNOW TOBY VIGOD, WHO IS HERE TODAY PARTICIPATING IN THE "GREAT LAKES LOBBYING WEEK".

THERE HAVE BEEN SOME INTERESTING DEVELOPMENTS AT THE FEDERAL AND PROVINCIAL GOVERNMENT LEVELS OVER THE LAST FEW YEARS WITH REGARD TO PUBLIC PARTICIPATION. IN 1981, THE THEN MINISTER OF THE ENVIRONMENT, THE HONOURABLE JOHN ROBERTS, ANNOUNCED A PUBLIC CONSULTATION AND INFORMATION AVAILABILITY POLICY. THIS ESTABLISHED A FRAMEWORK WITHIN WHICH THE DEPARTMENT WOULD CONDUCT FUTURE PUBLIC CONSULTATION ACTIVITIES, AND IS DIVIDED INTO FOUR PARTS.

THE FIRST, "PUBLIC CONSULTATION", ASSURED A REGULAR AND PREDICTABLE OPPORTUNITY FOR THE PUBLIC TO MEET WITH DEPARTMENTAL OFFICIALS IN ORDER TO DISCUSS ENVIRONMENTAL ISSUES AND CONCERNS. THE SECOND, "REGULATION MAKING", REQUIRED

THAT ALL SIGNIFICANT NEW REGULATIONS AND GUIDELINES BE SUBJECT TO AN EXPLICIT PROCEDURE THAT ALLOWS FOR PUBLIC COMMENT AT ALL STAGES OF THEIR DEVELOPMENT. THE THIRD, "INFORMATION AVAILABILITY", MADE MOST DEPARTMENTAL INFORMATION, INCLUDING RAW DATA, ACCESSIBLE TO THE PUBLIC. AND THE FOURTH, "CONTRIBUTION TO TRANSPORTATION EXPENSES" SPEAKS FOR ITSELF, AND PROVIDES ASSISTANCE TO PUBLIC INTEREST GROUPS AND PROFESSIONAL ASSOCIATIONS TO ATTEND DESIGNATED MEETINGS. THIS LAST PART IS PARTICULARLY DIFFERENT FROM THE RELATIONSHIP IN THE U.S. BETWEEN ENVIRONMENTAL GROUPS AND THE GOVERNMENT, WHERE ANY SUCH CONTRIBUTIONS WOULD BE HIGHLY SUSPECT, AND ILLUSTRATES A MORE COOPERATIVE RELATIONSHIP BETWEEN THE TWO GROUPS IN CANADA.

THERE HAS BEEN MUCH ATTENTION IN BOTH COUNTRIES LATELY ON THE HARMFUL EFFECTS OF PESTICIDES. IN CANADA, PESTICIDES ARE REGULATED BY THE MINISTRY OF AGRICULTURE, UNDER THE AUTHORITY OF THE "PEST CONTROL PRODUCTS ACT". SOME TIME AGO THE MINISTRY COMMISSIONED "THE SALTER REPORT", WHICH FOCUSSED ON DEVELOPING PUBLIC CONSULTATION IN PESTICIDE POLICY-MAKING. THE REPORT MADE A NUMBER OF RECOMMENDATIONS, INCLUDING; SETTING UP A PUBLIC INFORMATION "HOT LINE"; ESTABLISHING A PEST MANAGEMENT ADVISORY BOARD; CREATING AN INFORMATION SECRETARIAT; AND ENHANCING THE PESTICIDES DIVISION WITHIN THE DEPARTMENT

THESE RECOMMENDATIONS HAVE ALL BEEN ADOPTED. THE PUBLIC INFORMATION "HOT LINE" IS AN 800 NUMBER AND IS APPARENTLY RECEIVING 200-300 CALLS PER MONTH NOW.

THE PEST MANAGEMENT ADVISORY BOARD WAS STARTED 1 JULY WITH A FULL TIME CHAIRMAN AND A BOARD DRAWN FROM SCIENCE, THE PUBLIC AND INDUSTRY. THE BOARD WILL SET UP A NUMBER OF PUBLIC CONSULTATIVE MEETINGS AND BASED ON THESE WILL PROVIDE CONTINUOUS REPORTING AND RECOMMENDATIONS TO THE MINISTER.

THE INFORMATION SECRETARIAT WILL FOCUS ON PROCESSING THE INFORMATION IN AND OUT OF THE DEPARTMENT, PREPARE BROCHURES AND OTHER MATERIALS AND HOOK-UP INTO THE PUBLIC INFO "HOT LINE".

FINALLY, THE DEPARTMENT'S PESTICIDE DIVISION, WAS ENLARGED TO A DIRECTORATE JULY 1ST AND NOW INCLUDES THE INFORMATION SECRETARIAT, THE PRODUCT MANAGEMENT DIVISION AND THE POLICY DIVISION. I UNDERSTAND THAT THE CURRENT MINISTER HAS EVERY INTENTION OF IMPLEMENTING THE SALTER REPORT RECOMMENDATIONS TO THE FULL.

ALONGSIDE THE CHANGES GOING ON IN THE WAY FEDERAL BUREAUCRATS ARE APPROACHING ENVIRONMENTAL POLICY-MAKING, CHANGES ARE ALSO TAKING PLACE IN THE PROVINCES WHICH, AS I SAID EARLIER, HOLD THE RESPONSIBILITY, UNDER THE CANADIAN CONSTITUTION, FOR REGULATING NATURAL RESOURCES. AS YOUR INTEREST THIS WEEK IS IN THE GREAT LAKES, I WILL TELL YOU A LITTLE ABOUT THE PROVINCE OF ONTARIO.

THE PROVINCE WAS RUN BY A CONSERVATIVE GOVERNMENT FOR OVER 40 YEARS UNTIL MAY OF THIS YEAR WHEN THE LIBERALS RATHER DRAMATICALLY TOOK OVER WITH THE SUPPORT OF THE THIRD PARTY, THE NEW DEMOCRATS. THE LIBERAL ELECTION PLATFORM INCLUDED PROMISES REGARDING PASSAGE OF THE ONTARIO SPILLS BILL, AN ENVIRONMENTAL BILL OF RIGHTS, RIGHT TO KNOW LEGISLATION, MECHANISMS TO ESTABLISH THE PRINCIPLE OF "MAKE THE POLLUTER PAY" AND THE ESTABLISHMENT OF A SELECT COMMITTEE TO REPORT ON BILATERAL ENVIRONMENTAL ISSUES AFFECTING ONTARIO.

ENVIRONMENTAL ACTIVISTS APPEAR TO HAVE DONE AN EXCELLENT JOB OF GETTING THE ISSUES RAISED DURING THIS ELECTION. THE TWO MOST IMPORTANT MINISTERS FROM THE ENVIRONMENTAL POINT OF VIEW ARE JIM BRADLEY, MINISTER OF THE ENVIRONMENT, WHO IS ALSO M.P.P. FOR ST. CATHERINES, AND VINCE KERRIO, MINISTER OF NATURAL RESOURCES, WHO IS ALSO M.P.P. FOR NIAGARA FALLS.

BEARING IN MIND THAT THE PROVINCIAL LEADERSHIP WORKS IN A WAY VERY SIMILAR TO THE FEDERAL GOVERNMENT, WHERE POLITICAL POWER IS CENTRED AT THE CABINET LEVEL, IT IS NOT SURPRISING THAT THE NEW PROVINCIAL GOVERNMENT HAS LISTED THE NIAGARA RIVER AS ITS MAJOR ENVIRONMENTAL ISSUE. IN FACT, MINISTER BRADLEY RECENTLY ANNOUNCED A PROGRAM TO CLEAN UP THE COMPARATIVELY INSIGNIFICANT POLLUTION CANADIANS CONTRIBUTE TO THE NIAGARA RIVER IN ORDER TO MORE FORCEFULLY PURSUE THE U.S. IN CLEANING UP THE MAJOR PART.

WE ALSO HAVE A NEW ENVIRONMENT MINISTER IN THE FEDERAL GOVERNMENT. ON 20 AUGUST THE PRIME MINISTER, IN AN EXPECTED CABINET SHUFFLE, ANNOUNCED THAT THE HONOURABLE THOMAS McMILLAN WOULD BE MINISTER OF THE ENVIRONMENT. MR. McMILLAN IS FROM PRINCE EDWARD ISLAND, AND SERVED ON THE FISHERIES AND FORESTRY COMMITTEE, AND THE SPECIAL COMMITTEE ON ACID RAIN IN THE EARLY EIGHTIES. HE HAS HELD THE POSITION OF MINISTER FOR TOURISM SINCE LAST FALL. I HAVE COPIES OF HIS BIOGRAPHY IF YOU SHOULD WANT MORE INFORMATION.

IN SUMMARY, THE CANADIAN POLITICAL STRUCTURE, AND THEREFORE ITS ENVIRONMENTAL POLICY-MAKING PROCESSES ARE VERY DIFFERENT FROM THOSE IN THE UNITED STATES. ALTHOUGH AT THE FEDERAL LEVEL POWER IS PRIMARILY CENTERED IN THE CABINET THERE IS A CLEAR ROLE FOR PUBLIC INTEREST GROUPS TO HAVE AN INFLUENCE AT THE VARIOUS STAGES IN THE POLICY-MAKING PROCESS. ALSO, SINCE THE CANADIAN POLITICAL SYSTEM IS NOT BASED ON THE HIGHLY ADVERSARIAL SYSTEM OF THE SEPARATION OF POWERS WHICH EXISTS IN THE U.S., THERE IS THEREFORE LESS OF A REQUIREMENT TO RESORT TO THE COURTS TO SECURE POLICY OR LEGISLATIVE CHANGES. FINALLY, PROVINCIAL AUTHORITY FOR NATURAL RESOURCE MANAGEMENT AND REGULATION OFTEN DICTATES A DUAL APPROACH WHEN CAMPAIGNING ON A PARTICULAR ISSUE, AND SOMETIMES BATTLES ARE WAGED AND WON TOTALLY OUTSIDE THE FEDERAL CAPITAL.

AS NEIGHBOURS, WE SHARE SO MUCH, AND HAVE SO MANY SIMILARITIES, THAT IT IS OFTEN DIFFICULT TO APPRECIATE THE DIFFERENCES IN THE TWO SYSTEMS. I HOPE THAT TODAY I HAVE GIVEN YOU A GOOD IDEA OF HOW THE CANADIAN POLICY-MAKING PROCESS HAS DEVELOPED TO SERVE OUR NEEDS IN THE CANADIAN CONTEXT, AND A SENSE OF THE DYNAMIC NATURE OF THAT PROCESS.

THANK YOU.

APPLAUSE (HOPEFULLY)

AND NOW I WOULD LIKE TO ASK TOBY VIGOD OF THE CANADIAN ENVIRONMENTAL LAW ASSOCIATION TO SAY A FEW WORDS FROM THE PERSPECTIVE OF PRACTICAL LOBBYING IN CANADA, AND PERHAPS TO DESCRIBE IN A WAY THAT I CANNOT, THE MOST EFFECTIVE MECHANISMS SHE HAS FOUND WITH OTHER MEMBERS OF CANADA'S GRASS ROOTS COMMUNITY TO ACHIEVE THEIR GOALS. TOBY VIGOD.