



May 29, 2025

Hon. Minister Rob Flack
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Delivered via E-mail

Dear Hon. Minister Flack:

Re: Environmental Bill of Rights Requires Public Consultation on Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*

Canadian Environmental Law Association (“CELA”) is writing to express concerns about the fast-tracking of Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025* prior to the conclusion of the public consultation period for the bill as required by the *Environmental Bill of Rights*.

The public consultation period is set to be completed on June 11, 2025. We urge the government to allow for appropriate and thorough public consultation as required by the *Environmental Bill of Rights* prior to passage of the bill.

A. Canadian Environmental Law Association

CELA is a public interest law clinic dedicated to environmental equity, justice, and health. Founded in 1970, CELA is one of the oldest environmental advocates for environmental protection in the country. With funding from Legal Aid Ontario (LAO), CELA provides free legal services relating to environmental justice in Ontario, including representing qualifying low-income and vulnerable or disadvantaged communities in litigation. CELA also works on environmental legal education and reform initiatives.

B. Public Consultation is Required by *Environmental Bill of Rights*

Despite the claim in Environmental Registry of Ontario Posting #025-0461, the proposed changes in Bill 17 will not have a neutral impact on the environment. Serious concerns have been raised with the government relating to amendments that could hamper municipal power to take action on climate change and reduce greenhouse gas emissions.

The proposed amendments in Bill 17 are therefore within the scope of sections 14 and 15 of the *Environmental Bill of Rights* and may have a significant effect on the

Canadian Environmental Law Association

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environment. Pursuant to section 35, the Minister must ensure that all public comments are considered. The Minister will not be able to meet the requirements of the *Environmental Bill of Rights* if Bill 17 is passed prior to the end of the public consultation period.

We therefore urge the government to ensure that Bill 17 is not passed prior to June 11, 2025 and that it takes the time to consider the serious concerns being raised about the impact of this bill on municipal climate action.

Yours truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION

A handwritten signature in black ink, appearing to read 'Theresa McClenaghan', with a large, stylized loop at the end.

Theresa McClenaghan
Executive Director & Counsel

cc. Premier Doug Ford
Hon. Steve Clark, Government House Leader
Marit Stiles, Leader of the Opposition
Bonnie Crombie, Leader of Ontario's Liberals
Mike Schreiner, Leader of the Ontario Greens
Jeff Burch, Critic, Municipal Affairs and Skilled Trades
Catherine McKenney, Critic, Housing
Stephen Blais, Critic, Infrastructure and Municipal Affairs
Shelley Spence, Auditor General of Ontario
Tyler Schulz, Assistant Auditor General, Commissioner of the Environment