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Project Evaluation Policy Project Team

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To whom it may concern,

Re: Revoking the Class Environmental Assessment for Resource Stewardship and Facility Development Projects (ERO 026-0563) and Proposing a Project Evaluation Policy that would replace the Class Environmental Assessment for Ministry of Natural Resources Resource Stewardship and Facility Development Projects (ERO 026-0089)

The Canadian Environmental Law Association (CELA) provides the following general and specific comments in response to the following two Environmental Registry proposals:

- 1) *Revoking the Class Environmental Assessment for Resource Stewardship and Facility Development Projects (ERO 026-0563);*¹ and
- 2) *Proposing a Project Evaluation Policy that would replace the Class Environmental Assessment for Ministry of Natural Resources Resource Stewardship and Facility Development Projects (ERO 026-0089).*²

¹ See <https://ero.ontario.ca/notice/026-0563> [ERO 026-0563].

² See <https://ero.ontario.ca/notice/026-0089> [ERO 026-0089].

PART 1: INTRODUCTION

a. Background

Canadian Environmental Law Association (CELA) is a legal aid clinic dedicated to environmental equity, justice, and health. Founded in 1970, CELA is one of the oldest advocates for environmental protection in the country. CELA provides free legal services relating to environmental justice in Ontario, including representing low-income and vulnerable or disadvantaged communities in litigation. CELA also works on environmental legal education and law reform initiatives.

CELA has a longstanding interest in Ontario's environmental assessment regime and in ensuring that environmental decision-making is transparent, accountable, and informed by meaningful public participation. CELA has regularly participated in environmental law reform initiatives concerning the implementation and modernization of the *Environmental Assessment Act* ("EAA").

b. The Two Proposals

The two proposals addressed in these comments are connected. They are as follows:

- Under ERO 026-0563, the Ministry of the Environment, Conservation and Parks ("MECP") proposes to revoke the approval of the *Class Environmental Assessment for Ministry of Natural Resources Resource Stewardship and Facility Development Projects* ("Class EA-RSFD") and exempt certain Ministry of Natural Resources ("MNR") projects from Part II.1 of the *EAA*.³
- Under ERO 026-0089, MNR proposes to replace the Class EA-RSFD with an internal Project Evaluation Policy ("PEP") that would operate outside of the *EAA*.⁴

Accordingly, the two proposals must be considered together - ERO 026-0563 proposes to remove the existing Class EA-RSFD framework, while ERO 026-0089 proposes the PEP that would replace it.

c. The Existing Class EA-RSFD Framework

³ [ERO 026-0563](#).

⁴ [ERO 026-0089](#).

The Class EA-RSFD was approved in 2002 and came into effect on March 31, 2003.⁵ It applies to certain resource stewardship activities, facility development projects, and approvals or permissions involving the use of public lands or natural resources.⁶ Examples of this include habitat restoration and fisheries management, the construction or upgrading of ministry facilities, and permits, licences and land transactions involving public lands or natural resources.⁷

The Class EA-RSFD establishes a standardized environmental assessment process for projects carried out by, or on behalf of, MNR.⁸ Through this process, MNR assesses a project's potential effects on the environment, engages in dialogue with interested parties, and determines appropriate mitigation measures.⁹

Projects are screened according to their potential environmental impacts so that the appropriate level of assessment, documentation and consultation can be determined.¹⁰ MECP indicates that the vast majority of projects screened under the Class EA-RSFD have low potential net negative effects and require no further environmental assessment.¹¹

The existing Class EA-RSFD also operates within the statutory framework of the *EAA*.¹² Among other things, section 16 of the *EAA* provides for the minister to make orders in certain circumstances.¹³ For instance, a person may request an order where the statutory requirements relating to potential adverse impacts on constitutionally protected Aboriginal or treaty rights are met, and the Minister may also issue an order on the Minister's own initiative subject to the applicable statutory timeframes.¹⁴

d. Proposed Revocation of the Class EA-RSFD (ERO 026-0563)

Under ERO 026-0563, MECP proposes to make a regulation under the *EAA* that would revoke the approval of the Class EA-RSFD and exempt certain MNR projects from Part II.1 of the *EAA*.¹⁵ The proposed exemption would also clarify that these projects would not become subject

⁵ Ontario, Ministry of the Environment, Conservation and Parks, "Class Environmental Assessment for MNR Resource Stewardship and Facility Development Projects", online: Government of Ontario <<https://www.ontario.ca/page/class-ea-resource-stewardship-and-facility-development-projects>>.

⁶ Ontario, Ministry of Natural Resources, *Proposal: Developing a Project Evaluation Policy (PEP) to Replace the Class Environmental Assessment for MNR Resource Stewardship and Facility Development Projects (Class EA-RSFD)* (2026) at 2 [[PEP Proposal Paper](#)].

⁷ [ERO 026-0089](#); [PEP Proposal Paper](#) at 2.

⁸ [ERO 026-0089](#); [PEP Proposal Paper](#) at 2.

⁹ [ERO 026-0089](#); [PEP Proposal Paper](#) at 2.

¹⁰ [ERO 026-0563](#).

¹¹ [ERO 026-0563](#).

¹² [ERO 026-0563](#).

¹³ *Environmental Assessment Act*, RSO 1990, c E.18, s 16 [[EAA](#)].

¹⁴ [EAA](#), ss 16(1), (3), (6), 16.1.

¹⁵ [ERO 026-0563](#).

to another approved Class Environmental Assessment following the revocation of the Class EA-RSFD.¹⁶

MECP also proposes transitional provisions for projects that have completed or commenced the Class EA-RSFD process before the proposed regulation comes into force.¹⁷ These projects would generally remain subject to the Class EA-RSFD and the *EAA* for a five-year transition period.¹⁸ Where a section 16 order request remains outstanding at the end of that period, the *EAA* would continue to apply until the request is decided.¹⁹

Following revocation and the applicable transition period, projects previously addressed under the Class EA-RSFD would generally proceed under the proposed PEP or other MNR processes, where applicable.²⁰ However, as discussed below, the PEP would not apply to all projects currently captured by the Class EA-RSFD.²¹ MECP would also no longer administer the Class EA-RSFD, and existing Class EA review and annual reporting requirements would end.²²

According to MNR and MECP, these proposed changes are intended to reduce administrative burden, avoid duplication with other review processes, shorten timelines for lower-impact projects, and provide greater clarity and predictability for businesses and organizations seeking approvals for projects on public lands.²³

e. Proposed Project Evaluation Policy (ERO 026-0089)

Under ERO 026-0089, MNR proposes to replace the Class EA-RSFD with an internal PEP, operating outside the *EAA*.²⁴ According to MNR, the PEP would adopt a risk-based approach intended to focus environmental evaluation on projects with a higher potential for impacts on the environment, natural resource management and/or Indigenous values, while reducing requirements for projects considered to have a lower potential for impacts.²⁵

The PEP would apply to certain activities carried out by or on behalf of MNR, including activities delivered by contractors, consultants or third parties.²⁶ It would also apply to certain approvals or authorizations issued by MNR that allow work, activities, use or occupation on

¹⁶ [ERO 026-0563](#).

¹⁷ [ERO 026-0563](#).

¹⁸ [ERO 026-0563](#).

¹⁹ [ERO 026-0563](#).

²⁰ [ERO 026-0563](#); [ERO 026-0089](#).

²¹ [PEP Proposal Paper](#) at 10-14.

²² [ERO 026-0563](#).

²³ [ERO 026-0563](#); [ERO 026-0089](#).

²⁴ [ERO 026-0089](#); [PEP Proposal Paper](#) at 2.

²⁵ [PEP Proposal Paper](#) at 6.

²⁶ [PEP Proposal Paper](#) at 10.

public lands or shore lands, or grant rights to public lands or natural resources.²⁷ A “project” would not include strategic, policy, or planning activities, including land use planning, community-based land use planning, or resource management planning.²⁸ A project would also not include activities undertaken by private persons or entities that are otherwise regulated by MNR, including under the *Lakes and Rivers Improvement Act* and the *Oil, Gas and Salt Resources Act*.²⁹ Such activities would thus fall outside the PEP and proceed under applicable legislation, policies, and procedures.

For projects within the scope of the PEP, MNR would first determine whether an exclusion applies.³⁰ Proposed exclusions include emergency projects, federally regulated projects, projects subject to another process identified by MNR as providing similar environmental oversight, and projects listed in Appendix 2 as having a lower potential for impacts.³¹ Projects falling within an exclusion would not require a project evaluation under the PEP.³²

Projects listed in Appendix 3 as having a higher potential for impacts would automatically require a project evaluation.³³ Other projects that are not excluded would undergo a preliminary review to determine whether they have a higher potential for impacts.³⁴ This would be a high-level review based on readily available information, including information provided by an applicant, existing ministry data and mapping, and local knowledge.³⁵ Detailed studies or field investigations would not be required at this stage.³⁶ As indicated by MNR, if the preliminary review does not identify a higher potential for impacts, MNR would document this rationale and the project could then proceed without a project evaluation, subject to other applicable requirements.³⁷

Where a project evaluation is required, a draft Project Evaluation Report would be prepared and would describe the project and study area, potential impacts, proposed avoidance and mitigation measures, and an engagement plan.³⁸ Thus, as per MNR, identified parties would receive notice of the proposed project, access to the draft report and information about how to provide

²⁷ [PEP Proposal Paper](#) at 10.

²⁸ [PEP Proposal Paper](#) at 10.

²⁹ [PEP Proposal Paper](#) at 10.

³⁰ [PEP Proposal Paper](#) at 10-12.

³¹ [PEP Proposal Paper](#) at 11-14, Appendix 2.

³² [PEP Proposal Paper](#) at 10-12.

³³ [PEP Proposal Paper](#) at 14, 29, Appendix 3.

³⁴ [PEP Proposal Paper](#) at 12, 14.

³⁵ [PEP Proposal Paper](#) at 12.

³⁶ [PEP Proposal Paper](#) at 12.

³⁷ [PEP Proposal Paper](#) at 13-16.

³⁸ [PEP Proposal Paper](#) at 16.

comments.³⁹ A minimum 30-day comment period would apply, with additional engagement methods available depending on the project and parties involved.⁴⁰

Following engagement, the report would then be updated to document how issues identified through the evaluation and engagement processes were considered and addressed.⁴¹ MNR would then determine whether the evaluation is complete and finalize the report. Once finalized, there would be no further opportunity to comment on the report and no administrative review or reconsideration.⁴²

PART 2: COMMENTS AND RECOMMENDATIONS

a. Removing MNR Projects from the Environmental Assessment Act Would Reduce Statutory Environmental Oversight (ERO 026-0563 and ERO 026-0089)

CELA is concerned that the proposals would remove certain MNR projects from the environmental assessment process under the *EAA* and replace that process, where the PEP applies, with an internal MNR policy. While CELA supports efforts to improve administrative efficiency and avoid unnecessary duplication, these objectives should not come at the expense of environmental oversight, transparency, accountability, or meaningful public participation.

CELA is also concerned that it is unclear what statutory authority, if any, MNR intends to rely upon to develop and implement the proposed PEP. Unlike the Class EA-RSFD, which was approved and operates within the statutory framework of the *EAA*, the proposed PEP appears to be an internal MNR policy that would operate outside of the *EAA*. The proposal materials do not clearly identify the statutory authority upon which MNR intends to rely in implementing the PEP.

MECP notes that the vast majority of projects screened under the Class EA-RSFD have low potential net negative effects and that, in recent years, fewer than 10 projects per year have required further assessment and consultation.⁴³ However, the fact that most projects are ultimately found to have low potential for negative effects does not mean that screening is unnecessary. Rather, CELA asserts that screening is the essential process that is used to identify potential environmental effects and to determine the appropriate level of assessment of a given project.

³⁹ [PEP Proposal Paper](#) at 20-21.

⁴⁰ [PEP Proposal Paper](#) at 20-22.

⁴¹ [PEP Proposal Paper](#) at 16-21.

⁴² [PEP Proposal Paper](#) at 23.

⁴³ [ERO 026-0563](#).

CELA also notes that the proposed changes would remove statutory safeguards available under the existing *EAA* framework. As mentioned above, section 16 provides for ministerial orders in certain circumstances.⁴⁴ In particular, section 16 currently provides a mechanism through which a person may request an order where the statutory requirements relating to potential adverse impacts on constitutionally protected Aboriginal or treaty rights are met.⁴⁵ Under the proposed framework, this statutory mechanism would no longer be available for projects that would cease to be subject to the *EAA*. This is particularly concerning given the PEP's stated emphasis on Indigenous engagement and the Crown's duty to consult.⁴⁶ While the proposed PEP contemplates Indigenous engagement where Aboriginal or treaty rights may be adversely impacted, it does not appear to provide an equivalent statutory mechanism through which unresolved concerns relating to such impacts may be raised before a project proceeds.⁴⁷

By contrast, once a Project Evaluation Report is finalized under the proposed PEP, it appears that there would be no further opportunity to comment and no administrative review or reconsideration.⁴⁸ CELA is therefore concerned that the proposed PEP does not provide an equivalent mechanism through which Indigenous communities or other interested parties may seek further review of unresolved environmental or rights-related concerns before a project proceeds.

These concerns should also be considered in light of the United Nations Declaration on the Rights of Indigenous Peoples (“UNDRIP”).⁴⁹ The federal *United Nations Declaration on the Rights of Indigenous Peoples Act* affirms UNDRIP as a universal international human rights instrument with application in Canadian law.⁵⁰ While the obligations under the federal Act apply specifically to the Government of Canada, the Department of Justice Canada recognizes UNDRIP as an important source for the interpretation of both provincial and federal law.⁵¹ The Department of Justice Canada further recognizes that the principle of free, prior and informed consent reflected in UNDRIP builds on and goes beyond the legal duty to consult.⁵² In this context, CELA is concerned that the proposal materials do not explain how the proposed approach, including the loss of the section 16 order request mechanism, is consistent with the

⁴⁴ *EAA*, s 16.

⁴⁵ *EAA*, s 16(6).

⁴⁶ *ERO 026-0089*; *PEP Proposal Paper* at 5, 21, 23-24.

⁴⁷ *PEP Proposal Paper* at 3, 5-6; *EAA*, s 16(6).

⁴⁸ *PEP Proposal Paper* at 23.

⁴⁹ United Nations Declaration on the Rights of Indigenous Peoples [*UNDRIP*]

⁵⁰ *United Nations Declaration on the Rights of Indigenous Peoples Act* [*UNDRIP Act*], s 4(a).

⁵¹ Department of Justice Canada, “About the Act”, online: Government of Canada <<https://www.justice.gc.ca/eng/declaration/legislation.html>>.

⁵² Department of Justice Canada, “About the Act”, online: Government of Canada <<https://www.justice.gc.ca/eng/declaration/legislation.html>>.

principle of free, prior and informed consent, particularly in relation to projects that may affect Indigenous lands, territories or resources.⁵³

In accordance with these comments, CELA therefore recommends that any replacement framework maintain appropriate environmental oversight, transparency, accountability and meaningful public participation. If the PEP proceeds, it should also provide a transparent process to address unresolved environmental concerns before a project proceeds. This should include an appropriate mechanism to address unresolved concerns relating to potential adverse impacts on Aboriginal or treaty rights.

RECOMMENDATION 1: CELA recommends that MECP not revoke the Class EA-RSFD unless the replacement framework maintains appropriate environmental oversight, transparency, accountability and meaningful public participation. MNR should also clearly identify the statutory authority relied upon to develop and implement the PEP. The replacement framework should include an appropriate mechanism to address unresolved concerns relating to potential adverse impacts on Aboriginal or treaty rights, as well as a transparent process to address unresolved environmental concerns before a project proceeds.

b. The Proposed PEP Should Provide for Consistent, Accessible and Meaningful Public Notice and Participation (ERO 026-0089)

CELA is concerned that the proposed PEP does not adequately ensure that potentially affected or interested members of the public will learn of projects undergoing evaluation. As outlined above, an engagement plan would identify parties to be notified. At minimum, identified parties would receive notice, access to the draft Project Evaluation Report and at least 30 days to comment.⁵⁴ Additional engagement methods that MNR indicates “may” be used include meetings or virtual sessions, and social media or targeted digital outreach.⁵⁵

This approach depends heavily on MNR identifying interested or affected parties in advance. However, people with a legitimate interest in projects involving public lands and natural resources may not be readily identifiable or located near a project and may therefore be missed by a notice process limited to identified parties. Direct notice to identified parties should therefore merely supplement, rather than outright replace, a standardized public notice process.

In accordance with these comments, CELA recommends that MNR use an established, centralized, publicly accessible registry for projects undergoing evaluation under the PEP. To do so, CELA recommends that MNR use the existing EBR registry. This will avoid having multiple

⁵³ [UNDRIP Act, Schedule](#), art 32(2).

⁵⁴ [PEP Proposal Paper](#) at 20-22.

⁵⁵ [PEP Proposal Paper](#) at 21.

environmental registries going on and be used to provide timely access to project notices, draft and final Project Evaluation Reports, relevant supporting information, comment deadlines, and information explaining how comments were considered. This is particularly important because revocation of the Class EA-RSFD would also end existing Class EA annual reporting requirements.⁵⁶

Additionally, other notice methods should be used where appropriate to the project and affected communities. Social media and targeted digital outreach may be useful for reaching geographically dispersed communities, including in northern Ontario, but should once again only supplement rather than outright replace standardized public notice. Where additional engagement is necessary to provide effective notice and meaningful participation, the PEP should require it rather than provide only that it “may” occur.

RECOMMENDATION 2: CELA recommends that the PEP require standardized and accessible public notice through the existing EBR public registry - supplemented by other engagement methods where appropriate. The registry should ensure that it includes project notices, draft and final Project Evaluation Reports, relevant supporting information, comment deadlines, and information explaining how public comments were considered.

c. Exclusions Based on Other Regulatory Processes Must Be Justified by Comparable Environmental Oversight (ERO 026-0089)

CELA is concerned about potentially excluding projects from the PEP simply because they are subject to another regulatory or approval process. The proposed PEP would exclude or otherwise place outside its scope certain activities regulated by MNR under the *Lakes and Rivers Improvement Act* and *Oil, Gas and Salt Resources Act*, projects identified in Appendix 1 as subject to processes that MNR considers to provide similar environmental oversight, and certain federally regulated projects.⁵⁷

While CELA agrees that unnecessary duplication should be avoided, the existence of another regulatory process does not necessarily mean that environmental evaluation under the PEP would be duplicative. Accordingly, before excluding a project, MNR must consider whether the other process provides comparable consideration of environmental effects and mitigation, as well as adequate documentation, transparency and opportunities for public participation.

In this way, and in accordance with these comments, CELA recommends that exclusions should be based on legitimate, proper, and comparable environmental oversight, rather than on the mere existence of another regulatory or approval process. Specifically, where the other process does

⁵⁶ [ERO 026-0563](#).

⁵⁷ [ERO 026-0563](#); [PEP Proposal Paper](#) at 10-14, Appendix 1.

not address all relevant environmental or procedural considerations, the PEP should require additional evaluation to address and avoid those gaps.

RECOMMENDATION 3: CELA recommends that projects be excluded from the PEP only where another regulatory process provides similar/comparable and in-depth environmental review, transparency and public participation. Where it does not, further evaluation under the PEP should be required.

d. Risk-Based Screening Must Account for Site-Specific and Cumulative Environmental Effects (ERO 026-0089)

CELA recognizes that a risk-based approach can help focus environmental review on projects with greater potential for negative effects. However, the potential effects of a project cannot always be determined by project type alone.

CELA is also concerned that the proposal materials do not clearly explain the basis upon which MNR determined which project types should be included in Appendix 3 as having a higher potential for impacts. MNR indicates that these project types were identified “[t]hrough past experience and analysis,” but does not further explain the nature of that experience and analysis or how the proposed criteria for identifying projects with a higher potential for impacts were applied in developing Appendix 3.⁵⁸ Accordingly, the proposal materials do not provide a clear or traceable basis for understanding why particular project types were included in Appendix 3 while others were not.

The proposal materials also do not identify whether public or Indigenous consultation informed the development of the proposed Appendix 3 project categories. While MNR indicates that feedback received from Indigenous communities, stakeholders and the public through the current consultation process will be considered in developing the PEP,⁵⁹ the proposed Appendix 3 categories were developed and published before the completion of this consultation process. Given that inclusion in Appendix 3 would automatically require a project evaluation, CELA recommends that MNR clearly explain the basis for the proposed project categories and how feedback received through consultation will inform the final Appendix 3.

To explain, the environmental significance of a project may depend on its location and the existing conditions in the surrounding area. A project that would normally be considered low risk may have greater effects where the environment is already degraded, sensitive or subject to other pressures. Similarly, several individual minor projects may have significant cumulative effects when considered together.

⁵⁸ [PEP Proposal Paper](#) at 12, Appendix 3.

⁵⁹ [PEP Proposal Paper](#) at 4.

In accordance with these comments, CELA recommends that the PEP therefore allow MNR to require further evaluation where site-specific conditions, existing environmental pressures or cumulative effects indicate that a project may have greater impacts than its project category would otherwise suggest. This is particularly important for projects listed in Appendix 2, which MNR proposes to exclude from project evaluation on the basis that they generally have a lower potential for impacts.⁶⁰ CELA further recommends that MNR clearly identify and publicly disclose the basis and criteria used to categorize projects according to their potential for impacts, including the basis for determining which project types are included in, or excluded from, Appendix 3.

RECOMMENDATION 4: CELA recommends that the PEP require a clear, transparent and evidence-based process for categorizing projects according to their potential for impacts, including clear documentation of the basis for determining which project types are included in, or excluded from, Appendix 3. The PEP should also require consideration of site-specific conditions, existing environmental pressures and cumulative effects when determining whether further project evaluation is required.

e. Delegation of the Project Evaluation Process Requires Clear MNR Oversight and Accountability (ERO 026-0089)

The proposed PEP would allow MNR to delegate parts of the project evaluation process to third parties.⁶¹ This may include preparing the draft Project Evaluation Report, assessing potential impacts and mitigation measures, conducting public and Indigenous engagement, and revising and finalizing the report.⁶²

CELA is concerned that extensive delegation could weaken government oversight and accountability, particularly where a third party has an interest in the project being evaluated. While technical or administrative work may appropriately be carried out by qualified third parties, MNR should remain responsible for the adequacy and integrity of the evaluation process.

In accordance with these comments, CELA thus recommends that the proposed PEP should clearly identify which responsibilities may be delegated and require appropriate MNR oversight of delegated work. MNR should remain responsible for determining whether the environmental evaluation is complete and whether a project should proceed. Otherwise, the adequacy and integrity of the evaluation process will be at risk.

⁶⁰ [PEP Proposal Paper](#) at 13-14, Appendix 2.

⁶¹ [PEP Proposal Paper](#) at 15-16.

⁶² [PEP Proposal Paper](#) at 15-16.

RECOMMENDATION 5: CELA recommends that the PEP clearly limit the responsibilities that may be delegated and require appropriate MNR oversight of delegated work. MNR should remain responsible for the adequacy of the evaluation and the final decision on whether a project should proceed.

PART 3: SUMMARY OF RECOMMENDATIONS

In relation to the comments above, CELA makes the following recommendations:

RECOMMENDATION 1: CELA recommends that MECP not revoke the Class EA-RSFD unless the replacement framework maintains appropriate environmental oversight, transparency, accountability and meaningful public participation. MNR should also clearly identify the statutory authority relied upon to develop and implement the PEP. The replacement framework should include an appropriate mechanism to address unresolved concerns relating to potential adverse impacts on Aboriginal or treaty rights, as well as a transparent process to address unresolved environmental concerns before a project proceeds.

RECOMMENDATION 2: CELA recommends that the PEP require standardized and accessible public notice through the existing EBR public registry - supplemented by other engagement methods where appropriate. The registry should ensure that it includes project notices, draft and final Project Evaluation Reports, relevant supporting information, comment deadlines, and information explaining how public comments were considered.

RECOMMENDATION 3: CELA recommends that projects be excluded from the PEP only where another regulatory process provides similar/comparable and in-depth environmental review, transparency and public participation. Where it does not, further evaluation under the PEP should be required.

RECOMMENDATION 4: CELA recommends that the PEP require a clear, transparent and evidence-based process for categorizing projects according to their potential for impacts, including clear documentation of the basis for determining which project types are included in, or excluded from, Appendix 3. The PEP should also require consideration of site-specific conditions, existing environmental pressures and cumulative effects when determining whether further project evaluation is required.

RECOMMENDATION 5: CELA recommends that the PEP clearly limit the responsibilities that may be delegated and require appropriate MNR oversight of delegated work. MNR should remain responsible for the adequacy of the evaluation and the final decision on whether a project should proceed.

CONCLUSION

CELA appreciates the opportunity to provide comments on ERO 026-0563 and ERO 026-0089 and would be pleased to provide further information or clarification regarding these comments.

Sincerely,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa McClenaghan
Executive Director and Counsel



Lucas Eisen
Articling Student

Cc: Dr. Tyler Schulz, Commissioner of the Environment