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July 22, 2021

The Honourable David Piccini
Minister of Environment, Conservation & Parks

Subject: Delay in Approving Proposed Amendments to the Municipal Class Environment Assessment

Dear Minister Piccini:

The Municipal Engineers Association (MEA), with the support of other associations, has been working closely and diligently with staff at the Ministry of Environment Conservation and Parks (MECP) regarding the proposed amendments to the Municipal Class Environmental Assessment (MCEA) over the course of several years. We are grateful for the opportunity to participate in this initiative by your government.

Some time has passed since our working group and Ministry staff completed their efforts to bring the proposed amendments to a conclusion and readiness for implementation. We are writing to express our concern regarding the significant passage of time as we await the approval of the proposed amendments to the MCEA.

The need for Environmental Assessment (EA) reform has been well documented over the last several years and supported by MECP staff, the Municipal Engineers Association (MEA), and other organizations and associations (including OGRA, RCCAO, OHBA, OWWA, OPWA, RPWCO), numerous proponents, and the government of Ontario.

The MEA appreciates your government's actions on EA reform. In 2019, your government approved the *More Homes, More Choices Act* that eliminated issues related to low-risk Schedule A/A+ projects. In 2020, *The COVID-19 Economic Recovery Act* dealt with the Part II Order process (PIIOR) for EA's. Both of these actions have been most helpful in improving the MCEA process.

The approval of the amendments to the various Class EA's and in particular the MCEA, however, is of critical importance.

The MEA has supported streamlining/modernizing the EA process for a significant period of time. Representatives from our association have met with former MECP Ministers Rod Phillips and more recently Jeff Yurek to express our commitment to working with MECP to achieve this end. In order to assist, a brief chronology is presented below to illustrate some of the significant inputs and efforts that have taken

place by our association and others.

- June 2019: MECP invites Class EA holders to submit amendments.
- September 2019: MEA submits proposed MCEA amendments for review.
- Winter 2019-20: MEA works with MECP to address staff comments related to the MCEA amendments.
- July 2020: MECP posts MCEA amendments for comment
 - MECP later extends amendment comment period.
- October 2020: MEA provides extensive comments and responses to the comments received.
- Winter/Spring 2021: MECP undertakes Indigenous consultation.
- June 2021: MECP announces that to address Indigenous concerns, a requirement to use a checklist will be included in the amendment for certain projects. MEA advises MECP it supports the announced solution to address Indigenous concerns.

We have been working cooperatively and have been fully engaged with MECP staff on this matter since this review process was initiated. This has involved a significant investment of time by our association members and others at some considerable cost, albeit we are a not-for-profit organization. We have been anticipating that the changes will come shortly and encourage your Ministry to approve the subject amendments expeditiously.

Also, many municipalities have postponed various projects as they are aware through our communications to members that the amendment review process has been well underway, and the approvals are forthcoming. As a result, we are aware that numerous important infrastructure projects in the province are currently on hold. These projects would certainly benefit from the clarity and project classifications proposed in the amendments to the MCEA.

Minister Piccini, the MEA, RPWCO, OPWA, OWWA, OHBA, and several other associations believe that all related matters have been thoroughly addressed and respectfully request that the MCEA amendments be approved forthwith.

Most importantly, the MCEA amendments support the position of your government to champion change that streamlines processes and reduce red tape to expedite the construction of infrastructure and facilitate an increase in housing supply. Minister, thank you for your consideration.



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Yours sincerely,

A handwritten signature in blue ink, appearing to read "Salim Alibhai", written over a horizontal line.

Salim Alibhai, P. Eng., PMP
MEA President

A handwritten signature in blue ink, appearing to read "Kealy Dedman", written over a horizontal line.

Kealy Dedman, P. Eng.
Chair – RPWCO

A handwritten signature in blue ink, appearing to read "Enrico P. Stradiotto", written over a horizontal line.

Enrico P. Stradiotto, P. Eng.
OPWA President

A handwritten signature in blue ink, appearing to read "Michele Grenier", written over a horizontal line.

Michele Grenier, P. Eng.
Executive Director - OWWA

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Joe Vaccaro
CEO, Ontario Home Builders Assoc.

cc **Craig Reid, Association of Municipalities of Ontario**
 Scott Butler, Ontario Good Roads Association
 Nadia Todorova, Residential Civil and Construction Alliance of Ontario