

Submitted on Wed, 12/02/2020 - 11:39

Application ID: 28591

Submitted values are:

Bill or item of business: **Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020**

Full name

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Paste submission

The Government is expediting Bill 229 through the legislative process despite a lack of public and First Nation engagement. This fast-track approach is unwarranted. We cannot put economic recovery from the COVID pandemic ahead of our environmental responsibilities. Pandemics like COVID are likely to increase in future with growing human populations and climate change, so it is critical that we balance our economic interests (forest practices, land development) with the necessity of maintaining ecosystem functions (productivity and diversity, soil / nutrient / water cycles).

According to CELA, if enacted as currently drafted, Schedule 8 of Bill 229 will remove the legal protections for endangered species and their habitat, as contained in the Endangered Species Act, 2007. Schedule 8 amendments exempt forestry operations on public land from prohibitions on killing, harming, or harassing a listed species and damaging or destroying habitat necessary for their survival and recovery. More alarmingly, Schedule 8 removes the ability of the Minister of Environment, Conservation and Parks to issue a species protection order or a habitat protection order to halt or alter forestry operations, even in circumstances where significant harm to an endangered species will result.

This seems incredibly short-sighted. If the process is too cumbersome, fix the process. Don't exempt companies from the principles and practices that maintain ecosystems (i.e., those we are aiming to protect with long standing and hard won legal tools such as the Enviro Assessment Act and Species at Risk Act)!

In terms of Schedule 6, it seems that there are a number of proposed changes (including improved transparency through publicly available information) that are warranted. BUT, overall, the proposed amendments are contradictory to the Conservation Authorities Act and proposed changes do not move us toward developing climate resilient communities in the future. A “watershed approach” is necessary though difficult and it takes time to develop. Perhaps CA's should not be doing research and writing grant proposals for research, but they certainly have a critical role to play in implementing a watershed approach and are key partners in research!

Conservation authorities must retain the ability to actively participate in and intervene on land use planning decisions to ensure watershed resilience to climate change and flooding. In particular, the current processes for seeking section 28 permits appears to be working quite well.

I submit that Schedules 6 and 8 of Bill 229 are highly problematic and should not be enacted in their present form.

Thank you for your attention.

Sincerely,

Stephanie Melles