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**To:** EA Review / Examen EE (CEAA)  
**Subject:** Comments for the CEAA Review

These comments are made in regards of the review process of the environmental assessment in Canada. Here are my comments, presented with the questions raised in the Scope of Review.

1. *How to restore robust oversight and thorough environmental assessments of areas under federal jurisdiction, while working with the provinces and territories to avoid duplication?*

Because the environment is a shared responsibility, there will always be involvement from both the federal and provincial governments. But because environmental impact can have transboundary effects, it is important for all these jurisdictions to offer a coordinated approach in regards of environmental assessment. The federal should have a legislation in place that would be used as an umbrella (or a guide) for provinces to legislate on their side of the environmental assessment process, while always respecting its field of competence. This federal legislation would "set the tone" for how environmental assessment should be carried out in Canada and should therefore be clear, precise and offer room for enforcement where needed (such as a monitoring component). Furthermore, because of the environment being such an important element in international law, it is imperative that the federal government would adopt a more stringent legislation on environmental assessment, one that would offer more precise guidance on methodology for project proponents when developing their environmental assessment applications.

2. *How to ensure decisions are based on science, facts and evidence and serve the public's interest?*

Every environmental assessment must provide their references when proposing a project application. If no references are provided or if the references provided are not thorough enough, it is imperative to send the application back to the project proponents to complete these. Without sound science, facts and evidence, no sound decisions can *and should* be made. The references would need to provide the sources of information, but the project proponent would also need to explain the methodology by which its calculations were made, if any calculations were made (for example, when calculating its project greenhouse gas emissions, the project proponent must explain how he got the numbers used for the calculations and how these are the most reliable available information available). Also, when developing an environmental assessment application, the most recent and readily available data should always be used.

*3. How to provide ways for Canadians to express their views and opportunities for experts to meaningfully participate?*

New technologies should be used for Canadians to express their views. Social media are a widely used tool for promotion and communication and a platform could be developed for Canadians to safely express their views and opinions in regard of a particular project. The usual public consultations in persons should also be used, conjunctively with new technologies. This would allow the maximum participation of Canadians, thus offering the best opportunity to gather the maximum point of views required to make a sound decision. The same two coordinated methods could be used for ensuring meaningful experts participation. Significant amount of time before the meeting or deadline should be provided for the expert or public to formulate its opinion and a variety of experts should be consulted to better reflect a variety of opinions.

*4. How to require project advocates to choose the best technologies available to reduce environmental impacts?*

Increasing monitoring activities and regulations would provide the best possible way to ensure that the best technologies available are used in a project. However, financial incentives might be useful for smaller type projects or even establishing a list of available technologies that could be shared, using a network platform built for that purpose. This could be categorized by types of project and annexed to environmental assessment regulations, in order for it to be updated frequently. The environmental assessment legislation in place should also require the project proponent to demonstrate and explain in the project's application how the technologies chosen for his proposed project are the best technology available (with references to back up this information).

*5. How to ensure that environmental assessment legislation is amended to enhance the consultation, engagement and participatory capacity of Indigenous groups in reviewing and monitoring major resource development projects?*

British Columbia used to have a mandatory presence of the Indigenous group in its committee in charge or reviewing projects subject to the environmental assessment process. Such a committee, with key stakeholders should be put in place, thus also ensuring the non-partisan and non-subjective approach of the whole environmental assessment process. This committee should therefore be established project by project, but in order to render the process as efficient as possible, key members could be identified for certain categories of project or for certain areas covered in a project. Public consultations should be made mandatory for each major resource development project, always with a session specifically targeted for Indigenous groups (facilitating their access to these consultations would be important, either with financial support or even via technology).

In addition to these questions, it is imperative that Canada integrates climate change considerations into its environmental assessment law and regulations. There is an urgent need for

added clarity on how GHG emissions can and should be taken into account for each types of proposed project (direction and methodology should be provided), but also a need to have adaptation measures be considered as a requirement under the available legislation. Mitigation and adaptation actions have been recognized as equally important in addressing climate change and with the recent Paris Agreement, it is essential that domestic legislation reflect our international commitments. Because climate change is the result of cumulative emissions, each and every project need to address climate change and because climate change impacts are already felt around the world, there is a serious and urgent need for them to also be considered when a project is subject to an environmental assessment. The lone consideration of historical data for weather information are not enough now. Climatic reports predicting the impacts of climate change for the region where a project is proposed also need to be considered for ensuring a sound development in our country.

Furthermore, all departments of the government should be involved in the review process, as the environmental assessment process can touch different sectors in Canada. Their expertise could provide important information in regards of ensuring thoroughness and effectiveness in the environmental assessment process. This diversity should also be represented in the review of environmental assessment project, to ensure adequate expertise on each sectors presented with each proposed project.

Thank you,

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