



Comments from Engineers Canada on:

Environmental Assessment Processes: Draft Terms of Reference for Expert Panel

Questions concerning this report should be directed to:

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Background information

Engineers Canada is the national organization of the provincial and territorial associations that regulate the practice of engineering in Canada and license the country's 290,000 members of the engineering profession. Engineering is a self-regulated profession. Engineers Canada exists to support the provincial and territorial engineering regulatory bodies. Together, we work to advance the profession in the public interest.

Engineers drive much of Canada's economy. Natural resources, manufacturing, technology and other sectors rely upon the expertise of engineers. As one of the top five exporters of engineering services in the world, the expertise and skill of Canada's engineers contributes to Canada's and the global economy. Engineers work tirelessly in Canada and abroad to keep the public safe and to contribute to strong, prosperous communities.

Engineers Canada is ready and willing to help the government build a better Canada. Among Canada's more than 290,000 members of the engineering profession, there are countless experts prepared to assist the government in strengthening the middle class, tackling innovations and improving the resilience of the country's infrastructure.

Comments

Engineers Canada believes it is vitally important to include engineers as members of the expert panel reviewing the environmental assessment processes. Many professional engineers are uniquely qualified and have the expertise to recommend the best policies, procedures and technologies to ensure the greatest value for Canadians, in terms of economic, environmental and social benefit. There are many professional engineers in the energy sector who have expertise in areas ranging from strategy to planning, to extraction, to transformation, to transportation, to decommissioning. In addition, many professional engineers have great expertise in the field of environmental assessment and environmental engineering. Every day, engineers across the country work on environmental assessments by evaluating the potential impact of their current and future projects on the environment. These professional engineers can provide unbiased and evidence-based advice within their mandate to serve the public interest.

Engineers Canada would be honoured to help facilitate the recruitment of highly qualified and skilled professional engineers who are recognized for their leadership and outstanding record of achievement in their respected fields. The inclusion of professional engineers on the expert panel will strengthen the credibility and capability of the panel through objective unbiased advice, technical expertise and our professional mandate to protect the public interest, our environment and our economy.

We therefore strongly recommend the creation of a multi-stakeholder advisory committee to the panel. Engineers Canada would be pleased to become participants of this committee in order to add engineering and science perspectives. We would once again be delighted to assist in identifying and facilitating access to engineers to provide expert advice in subject areas as the panel requires.

In addition, please find below some specific suggestions for your consideration:

- Regaining public trust is critical and can only be achieved when various options are outlined and evaluated instead of providing a prescriptive solution.
- A pre-project consultation process with Indigenous peoples prior to any preliminary work should be considered. This would gain trust and develop the “social license” to proceed to the steps that follow in the Environmental Assessment Process.
- A stated objective of the Environmental Assessment Process is “to help get resources to market.” Again, options need to be provided (i.e. pipelines, rail, etc.). Also the form of the resource—“as extracted,” “concentrated” or “transformed”—needs to be considered to assess the best value for Canadians, in terms of financial, environmental and social benefits.
- The need for evidence-based decisions is a necessity and needs to be reinforced.
- Incorporating in the scope the following need: “How to choose the best technologies available” is excellent and underscores the requirement to have strong engineering input in this process. Ensuring that the process of choosing the best technologies is transparent, well communicated, and incorporates measurable social, environmental and economic considerations needs to be reinforced.
- Ensure the context of panel decisions upholds the three pillars of sustainability, namely economic, environment and social factors, and are technically feasible for the project to implement.
- The panel should explore ways to streamline the review processes to reduce the total elapsed time between application and decision. A list of criteria could be developed to establish timelines for the each review on a case-by-case basis instead of a prescribed time limit.
- The scope of the review should include how to include climate change into review processes. This would include greenhouse gas emission reduction as an explicit objective for projects reviewed in the environmental assessment processes as well as requiring measures to address climate change impacts (e.g., vulnerability assessment, adaptation) that must be explicitly defined in project submissions.
- The Environmental Assessment Process should include an assessment of alternative scenarios – project alternatives that might still meet the project proponent’s needs, but at lower environmental impact.
- The Environmental Assessment Process must establish the need for ongoing monitoring of the environmental impacts of the project, to ensure they are within expected bounds, and to take remedial action should the impacts exceed those agreed upon when the project was approved.

- The Environmental Assessment Process must also consider the human health impacts of projects. Currently the impacts of projects on human health are overlooked, and in a changing climate, human health and the environment cannot be separated. The role of Human Health Impact Assessment must be integral to the Environmental Assessment Process.

Engineers Canada wishes to thank the federal government for the opportunity to comment on this important process to ensure the success of Canada's environmental protection and transition to a low carbon economy.