



**ONTARIO
RIVERS
ALLIANCE**

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Eugenia Chalambalacis
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By email: Eugenia.Chalambalacis@Ontario.ca

Re: ERO-019-1080 – Proposed changes to environmental approvals for municipal sewage collection works

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization working to protect, conserve and restore healthy riverine ecosystems. Due to Bill 197, the COVID-19 emergency and a short comment period, ORA is making a short but to the point submission.

This ERO posting is proposing to “*modernize Ontario’s environmental approval process for low-risk municipal sewage works by implementing a Consolidated Linear Infrastructure Permissions Approach. The proposed approach will consolidate and update the approvals process for these types of works and incorporates measures that will enhance environmental protection*”. This posting goes on to explain why consultation isn’t required, that “*no changes to legislation are being proposed, and the changes are administrative.*” Again, the claim that this change to environmental approvals will “*enhance environmental protection*” is misleading. It also states that the proposed approach uses a risk-based framework to improve service delivery and public transparency. How does it enhance environmental protection or increase public transparency?

The ORA strongly objects to any approach that eliminates the opportunity for public and Indigenous consultation and input regarding any sewage and stormwater infrastructure projects, especially any expansions or upgrades when they could have a negative environmental impact on the riverine environment and communities.

Many private and municipal sewage works are already at or over capacity and regularly release untreated and undertreated wastewater effluent into Ontario riverine ecosystems during spring melt and heavy rain events. Climate change is increasing the frequency and intensity of extreme rain events, which has in turn increased the volume and frequency of untreated and partially treated effluent being released into Ontario rivers.

According to a recent NASA and National Science Foundation funded study of more than half of the world’s freshwater supply, climate change is rapidly warming lakes and rivers around the world and threatening freshwater supplies and ecosystems¹, so it’s crucial that we build resilience into our lakes and rivers. “*Climate will interact with overexploitation, dams and diversions, habitat*



destruction, non-native species and pollution to destroy native freshwater fisheries. Climate warming will adversely affect water quality and water quantity, as well as the magnitude and timing of river flows, lake levels and water renewal times.”²

In fact, many cities and municipalities are commissioning climate driver studies to plan for infrastructure investments in this warming climate. For instance, Toronto commissioned a Future Weather and Climate Driver Study in 2012 to help inform present and future infrastructure and service decisions. By improving the level of certainty regarding the magnitude and frequency of expected climate change effects, and particularly extreme weather events, the City wanted to reduce the risk of unsustainable investment and loss associated with infrastructure construction, maintenance and operations. The Study revealed that there will be *“Less snow and more rain in the winters (26 fewer snow days per year) and fewer rainstorm events per year are anticipated. However, the model predicts more extreme rainstorms and marked rainfall increases in July (80%+) and in August (50%+).”³*

These are compelling reasons to consider Climate Change and cumulative effects in planning and decision-making regarding infrastructure, especially when it will impact negatively on Ontario riverine ecosystems. It is crucial that we recognize the hazards of infrastructure that would degrade water quality, threaten our fisheries, or that jeopardize the ecosystem services that healthy rivers provide.

Whenever a developer wishes to obtain an Environmental Compliance Approval (ECA) to establish, alter, extend or replace sewage works or stormwater works, the public must have a meaningful opportunity to be consulted and provide comments, especially if it involves new housing and commercial developments.

This new Consolidated Linear Infrastructure Permissions Approach is stated to be modeled after the existing permission framework for municipal drinking water systems; however, each have totally different consequences when abuses or overcapacity issues occur.

Consolidating all existing and future approvals into one new consolidated ECA for municipal sanitary collection systems and one new consolidated ECA for stormwater management works with pre-authorizations bypasses public consultation and input. This approach is totally unacceptable and irresponsible.

ORA submits that this proposed Consolidated Linear Infrastructure Permissions Approach poses the “*greatest risk to human health and the environment*” and we recommend that it be rejected in full.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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¹ Study: Climate Change Rapidly Warming World's Lakes, 16 December 2015.

² Schindler, D.W., 2001. The cumulative effects of climate warming and other human stresses on Canadian freshwaters in the new millennium. Canadian Journal of Fisheries and Aquatic Sciences. 58: 18-29.

³ Toronto's Future Weather & Climate Driver Study: Outcomes Report. P-15