



**ONTARIO  
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Diane Blachford  
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By email to: [Diane.Blachford@Ontario.ca](mailto:Diane.Blachford@Ontario.ca)

Re: ERO-019-2826, Statement of Environmental Values for the Ministry of Environment,  
Conservation and Parks

Dear Ms. Blachford:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore riverine ecosystems.

The ORA is pleased to comment on the proposed Ministry of Environment, Conservation and Parks' (MECP) draft Statement of Environmental Values (SEV).

ORA applauds the MECP's recognition and commitments to the consideration of Climate Change in its SEV and enshrining the need to reduce greenhouse gas emissions is a vitally important addition.

ORA also supports the addition of a five-year review period for the SEV, as this will ensure environmental priorities are kept current and relevant.

While the MECP is proposing many of the same important and lofty principles in its SEV, there are a few slight changes that we will address:

Under Section 2. Ministry Vision and Mandate, the new draft adds the words "*a prosperous economy*" to the end of the first sentence. Unfortunately, the MECP is already sacrificing the environment to obtain a prosperous economy, and this is a dereliction of duty, plain and simple.

The MECP is not doing what it has been mandated to do, and that is to ensure clean and safe air, land and water that contributes to healthy communities, ecological protection, and environmentally sustainable development for present and future generations. Leave the responsibility of a prosperous economy to the Finance Department. The MECP should focus solely on its responsibilities to the environment, and to safe communities. ORA strongly urges the Ministry to maintain the same wording in this Section 2, with no revisions.

**"Healthy Rivers – Healthy Communities"**



The draft also reads that MECP “*is committed to taking every reasonable steps to ensure that the ministry’s SEV is considered when decisions that might significantly affect the environment are made in the Ministry*”. ORA submits that “reasonable” is subjective; therefore, one man’s idea of reasonable can be very different from another man’s perspective. ORA submits that the old wording is more principled, so it is crucial that the SEV reads “*committed to ensuring that the ministry’s SEV is considered...*”

ORA comments frequently on Environmental Registry postings, as well as development proposals, and it is becoming the norm to bypass basic environmental assessment requirements, such as limits and objectives, studies, public consultation and other basic requirements. Old environmental assessments are being used, some that are over 20 years old, to push through large and highly controversial development proposals. Instead, development is being prioritized over environmental protection.

Many of our key environmental protection legislation and policies are being weakened by using ministerial discretion in decision making. Environmental legislation and policy is being streamlined and measures designed to protect the environment are being exempted to cater to increased development at the cost of the environment. Strong policy and legislation are a thing of the past in this province. All the while, this Ministry was supposedly having to adhere to a SEV that was purported to have been its guiding principles.

If the SEV is not being taken seriously now, why would we believe it will be taken seriously when this new SEV is adopted? The MECP should respect and fulfill its SEV in all areas of its purpose, which is its promise to Ontario taxpayers. Rather than focusing so heavily on the economy the MECP must apply its SEV in the protection and conservation of the environment.

It is extremely important that the Ministry ensures that the principles of its SEV are adhered to, and that they have integrity.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
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