Submission to the Standing Senate Committee on Energy, the Environment and Natural Resources on Part 1 of Bill C-69

Submitted by Douglas Ballam, Past-President, Nature Newfoundland and Labrador
24 April 2019

Honourable Senators:

Please accept this submission regarding Part 1 of Bill C-69 on behalf of Nature Newfoundland and Labrador (Nature NL). Nature NL is a non-profit organization and registered charity promoting the enjoyment and protection of all wildlife and natural resources in the province of Newfoundland and Labrador. Nature NL is this province’s oldest conservation organization and was formerly called The Natural History Society of Newfoundland and Labrador. We continue to be one of the province’s most active environmental organizations and regularly partner with other environmental groups to raise awareness and host nature events. Governed by a volunteer Board of Directors, we are a completely volunteer-run organization. Nature NL supports the joint submission made by six of Canada’s leading environmental organizations on federal environmental (impact) assessment of March 27, 2019. The organizations included West Coast Environmental Law, Ecojustice Canada, Nature Canada, Pembina Institute, Centre québécois du droit de l’environnement and the Ecology Action Centre.

The following bullet points summarize that submission.

- Overall support for Bill C-69 as a marked improvement of the Canadian Environmental Assessment Act, 2012 (CEAA 2012)
- The new Bill will bring greater transparency, accountability and credibility to environmental decision-making.
- Nature NL supports the recommended revisions (in the joint submission) to Sections 22(1), 37(1), 28(3), 33(2), 51(1)(d)(ii), 46.1, 48.1 and 50.

While Nature NL supports all aspects of the joint submission, we draw your attention to the amendments outlined for Section 46.1 and 48.1. We believe that both are essential for the perceived and actual strength of the Bill. Our members experience and observation is that the current oversight provided by offshore boards is not entirely independent from industry wishes or concerns. Specifically, the chair of the panel should not be appointed from the roster as we believe that this could be an avenue to stack the panel in favour of industry, especially if the appointed chair is from the offshore board.

We welcome the opportunity to discuss this submission further and thank you for your consideration.

Kindest Regards,

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