



March 13<sup>th</sup>, 2019

Clerk of the Senate Standing Committee on Energy, the Environment and Natural Resources  
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**Mining Association of Canada supplementary submission on Bill C-69  
to the Senate Standing Committee on Energy, the Environment and Natural Resources**

As emphasized in our written submission and in our presentation before the Committee on February 26<sup>th</sup>, our conclusions about the potential benefits of Bill C-69 over the *Canadian Environmental Assessment Act, 2012* assumed that the Bill would be well implemented.

Due to the length of time the Senate is taking to complete its review of the Bill, it is increasingly apparent that implementation will be challenging. In particular, we note that the Committee plans to submit its report to the Senate on May 9<sup>th</sup>. It is therefore unlikely that the Bill will reach Royal Assent before the end of June.

The coming into force and implementation of any of the Acts created or amended by Bill C-69 requires supporting regulations and guidance. With the expected lateness of royal assent, we fear that rushing the gazetting and consultations on regulations and guidance to allow coming into force prior to the 2019 federal election will not provide sufficient time for thoughtful analysis and consultation. Deficient regulations and guidance will translate into poor implementation.

To prevent such an unfortunate development, we urge you to amend the coming into force provisions for the *Impact Assessment Act* and the *Canadian Navigable Waters Act* to be no earlier than one year after Royal Assent.

It is in the best interest of all affected by Bill C-69 that its implementation be well prepared.