

## **Submission on the Discussion Paper of Federal Environmental and Regulatory Reviews Greenspace Alliance of Canada's Capital**

Having participated in the public consultations sponsored by the Expert Panel, we would like to offer our comments on the Discussion Paper released in June 2017.

First, we are pleased to see and strongly support the reinstatement of protections for fish habitat in the Fisheries Act.

However, we are disappointed to see that the Panel's recommendation to convert the Environmental Assessment Agency to a quasi-judicial board has been rejected. Leaving final decision making on issues of environmental assessment in the political realm does not inspire confidence in the results, which ought to be based on clear criteria and scientific evidence, subject to appeal.

Finally, we are horrified that the blanket protection of navigable waters has not been restored as per the former Navigable Waters Protection Act. We strongly believe that the default position should be that all navigable waters are protected, with proponents required to make a case for development. We strongly condemn retaining the notion that all navigable waters are open to development, with conservationists required to make a case for their protection. Tipping the scales to pro-development forces to this extent is unconscionable.

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Chair, Greenspace Alliance of Canada's Capital

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