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FEDERATION OF WOMEN TEACHERS' ASSOCIATIONS OF ONTARIO / THIRD FLOOR, 1260 BAY STREET, TORONTO, ONTARIO, M5R 2B8

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July 12, 1974.

The Honourable William G. Newman,
Ministry of the Environment,
135 St. Clair Avenue West,
Toronto, Ontario.

Dear Mr. Newman:

The Board of Directors and the Executive of the Federation of Women Teachers' Associations of Ontario have recently studied the Green Paper on Environmental Assessment, prepared by the Ministry of the Environment, and the brief submitted in response to that document by the Canadian Environmental Law Association.

Our organization would like to commend your Ministry for the direction it has taken in proposing a total environmental ethic which has as its focal point an integrated consideration at an early stage of the entire complex of environmental effects which might be generated by a project. Too frequently in the past we, as teachers, have witnessed the totally disruptive and irreversible effects of projects which were deemed economically worthwhile when initiated, but which have, over a period of time, proven cancerous in their destruction of the delicate balance between man and nature which is essential for the survival of all.

The Green Paper, while proposing long overdue preventative measures to overcome the recognized problem, leaves us with a number of concerns:

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- i) environmental assessment should not be restricted to major projects only; any environmental review agency must be able to exercise wide discretionary powers concerning projects which fall in the "gray area";
- ii) timing is a major factor; surely a workable streamlined procedure can be devised at the offset whereby environmental assessment can be expanded to commence with projects in the private sector concurrently with projects in the ministries and provincial agencies;
- iii) we believe that the process of final appeal should be to an elected body, that is, the Legislature, whose members are accountable to the public whom they serve;
- iv) we believe that there should be full public access to information pertaining to the assessment, and channels for public involvement prior to the decision must be made available; we further believe that civil servants should have the same rights and protection guaranteed to other citizens called to testify.

In conclusion, we support the fundamental principles and procedural guidelines set out in the brief submitted by the Canadian Environmental Law Association, and request your consideration of the issues considered in that document.

Sincerely,

Florence I. Henderson,
Executive Secretary.

MB/ME/deh

cc. - Canadian Environmental Law Association