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August 22, 2020

Antonia Testa, Special Project Officer
Environmental Assessment and Permissions Division
Ontario Ministry of Environment, Conservation and Parks
135 St Clair Ave W, Toronto, ON M4V 1P5

Re: ERO 019-1882 - Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project

Dear Ms. Testa,

As an organization that advocates for healthy built and natural environments that promote population health, health equity and environmental protection, OPHA recognizes the importance of the environmental assessment (EA) process, and further, believes that the EA process can be strengthened by incorporating a public health and health equity lens.

Thus, the Ontario Public Health Association (OPHA) **strongly urges the Ontario government to reconsider streamlining the environmental assessment process** for the Ministry of Transportation's (MTO) Greater Toronto Area (GTA) West Transportation Corridor project.

A full and thorough environmental assessment (EA), along with a health impact assessment (HIA) that uses the social determinants of health/health equity approach, is vital in order to assess the overall impacts of this project on the health and well-being of Ontario residents and to demonstrate the Province's commitment to creating healthy, sustainable and climate resilient communities.

Specifically, OPHA recommends that:

- **the Province ensure that the EA process for the GTA West maintain health and environmental protections based on up to date evidence, and**
- **the EA process consider incorporating a health lens (such as a health impact assessment or supplementary health review).**

The proposed regulation for a streamlined EA, as outlined on the Province's ERO website, would:

- Require MTO to complete an Environmental Conditions Report and an Environmental Impact Assessment (EIA) report.

- Permit “early works” to proceed to construction before the completion of the draft EIA report, subject to: requirements for consultation, identification of impacts and mitigation measures; issues resolution. Examples of early works include: new bridge construction and bridge replacement or expansion.
- This streamlined environmental assessment process would also “remove duplication between *Environmental Assessment Act* requirements and other specific legislation, as well as the Ministry of Transportation standards and practices, while maintaining environmental considerations.”

Without seeing a proposed regulation it is not clear how the streamlined process will maintain existing requirements to identify and mitigate environmental impacts, including human health impacts, or how it will contribute to healthy, sustainable and climate-resilient communities.

OPHA is concerned that streamlining the EA process may have unintended negative consequences for public health and will jeopardize opportunities for stakeholders, the public and Indigenous people to provide meaningful input on the potential health, health equity and social impacts of the project.

OPHA is also concerned that streamlining the EA process would ignore important developments in our understanding of the impacts of environmental conditions (e.g. noise and air quality) that need to be considered to protect public health. For example, air quality research is increasingly identifying the adverse health outcomes associated with air pollutants. Exposure to traffic-related air pollution (TRAP) has been linked with a range of adverse health outcomes including exacerbation and onset of asthma, cardiovascular illness and death, impaired lung function and lung cancer. Exposure to TRAP is also a health equity issue. Several Canadian studies have revealed that lower socio-economic status neighbourhoods are often located in areas with greater exposure to traffic-related air pollution. Earlier this year, OPHA was part of a research project that examined the potential for cleaner vehicles to improve public health and reduce greenhouse gas emissions in the Greater Toronto & Hamilton Area (GTHA). [Our recent modeling](#) estimated that pollution from traffic causes almost 900 premature deaths per year in the Greater Toronto and Hamilton Area (GTHA). More information is needed about the health impacts of the GTA West and resulting traffic pollution on residents who live nearby before proceeding with construction.

Given that the GTA West Corridor project now has a preferred alternative, it is essential to understand the overall health impacts of the project by means of a supplementary health review/health assessment using the general framework of an HIA. OPHA can provide additional details about health impact assessments and supplementary health reviews.

OPHA would like to reiterate our recommendation for a HIA, from our letter to the Ontario Minister of Transportation in September 2019, [Health Impact Assessment](#): “...*Health Impact Assessments integrate well within EA processes and use information from all relevant EA study reports. An approved HIA for the GTA West Corridor EA Study would use the following sources of information: Studies conducted as part of the EA (air quality, climate change, noise, traffic, socio-economic, etc.); Peer-reviewed primary literature; Government and other jurisdictional*

reports; Other HIAs and other health assessments conducted on similar projects; Information from relevant stakeholders and subject matter experts (e.g., transportation planners and public health professionals); ... One of the foundational principles of HIAs is engagement with a group of diverse stakeholders that can bring together their knowledge of the project and study areas and help prioritize the scope of the HIA. This input helps ensure an unbiased selection of relevant health determinants and indicators that might be evaluated by an HIA within the prescribed timeline and budget. ... Given all this, the OPHA recommends that an HIA be conducted. Completing an HIA in this instance will demonstrate the Province's commitment to creating healthy, livable and economically vibrant communities, and show Ontario residents that their health is a crucial aspect of the decision-making process."

Increasingly, jurisdictions across the globe are recognizing the value of incorporating a health and health equity lens when considering infrastructure projects. Health impact assessments are a valuable tool to identify and address health, social and health equity impacts of a project – both positive and negative impacts. This does not have to be an onerous or lengthy process, it can improve community engagement, it can identify and address unintended consequences of the project, and it can result in better overall health and societal outcomes.

In closing, OPHA would like to reiterate our position that environmental assessments, such as those for the GTA West corridor, must consider the health impacts to Ontarians, and specifically to the communities through which they are built - both the short-term and long-lasting impacts. This process will ensure that measures can be taken to improve health or mitigate potential adverse health impacts, prior to commencement of the project.

Thank you for your consideration.



**Pegeen Walsh,
Executive Director
ONTARIO PUBLIC HEALTH ASSOCIATION**

About the Ontario Public Health Association:

OPHA is a member-based charity that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including promoting public dialogue and education on healthy public policy, capacity building, research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.