

NORTHWATCH

June 18, 2025

Right Hon. Mark Carney
Prime Minister of Canada
House of Commons
Ottawa ON

Dear Prime Minister Carney:

Re. **Bill C-5, An Act to enact the Free Trade and Labour Mobility in Canada Act and the Building Canada Act**

It is with regret that our first communication with your new government is to express our strong objections to one of your first initiatives. But we must strongly object to Bill C-5, and in particular the *Building the Canadian Economy Act*; our objections are with respect to the content of the Bill but also the manner in which your government appears to be prepared to force it through without due consideration or the opportunity for Canadians to speak to it.

Northwatch is a regional environmental non-governmental organization in northeastern Ontario. We have been operating since 1988 when we were formed to provide a regional voice, particularly in the instance of large government processes where local groups and residents might be overlooked or overwhelmed. We have a dual mandate of advocating for environmental protection and supporting public participation in environmental and social decision-making.

Based on our lived experience in a region whose economy is largely based on resource extraction and our decades of experience as an organization participating in environmental assessment and permitting processes for a wide range of energy, forestry, mining, waste and nuclear projects we can say to you with absolute certainty: environmental assessments are essential and a Bill that would eliminate impact assessment is unacceptable.

There are some myths that must be dispelled.

We hear over and over and over again – particularly from the party that sits in opposition to your government – that mines take as long as 15 years to go through an environmental assessment process. The myth or misunderstanding being perpetuated is that this is because of the environmental assessment process. It is not. It is because of the decisions that proponents make, presumably driven by their financial constraints or interests. One example is the Marathon Mine. The review commenced in 2010 as a comprehensive study, a panel appointed in 2012, and hearings announced in 2013. After the hearing notice had been issued – so considerable time and effort had already been invested – the Panel posed a question to the proponent about the status of feasibility studies. The proponent responded by withdrawing their application. In [2014](#) the Minister disbanded the hearing panel based on the proponent having indicated that it did not plan to proceed with the project. In 2020, six years later, the review was [restarted](#) – same property,



but a different hearing panel, a different owner / proponent, a different mine design and a very revised environmental impact statement filed as an “addendum” - creating a false impression that it was a continuation of the same review. In 2022 the environmental [decision](#) was delivered. In practical terms, there were two environmental assessments with a gap of several years between. This was the function of choices the proponent made, not the assessment process. But the review time for projects such as this is used to fuel false charges against the environmental assessment process.

As of [May 2025](#) all approvals and permits were in place for the Marathon project but the company was reported to be “still on the hunt to secure all the \$961 million in initial capital financing needed to build the mine and its infrastructure.”

We agree that there would be great value in assessment and permitting processes being coordinated and preferably concurrent. But this would require the proponent to actually know what their project is before they begin the assessment process. Often this is not the case.

Another example of this was Ontario Power Generation’s proposed deep geological repository for low and intermediate level radioactive waste. OPG entered the review process describing a project to accommodate 200,000 cubic metres of radioactive waste. At the commencement of the hearing, OPG conceded that they intended to double that volume after approval had been granted. The hearing was extended to add additional hearing days one year after the hearing’s commencement to allow OPG time to respond to fundamental questions about their project from the Joint Review Panel. At the hearing’s conclusion, the proponent had persuaded the Panel that key design decisions could be deferred to later licensing stages, but important information was still outstanding. It was the decisions (possibly the indecision) of the proponent that stretched the review process out for several years.

In other instances, we have observed proponents describing their project very differently in one permit application than they had in a previous permit application. Again, these are decisions of the proponent, and we have urged the provincial government over many years to establish a coordinated permitting process to resolve these issues, and we would encourage the federal government to adopt a similar objective by working with the provinces to coordinate assessment and permitting processes and establish requirements for consistencies in project presentation.

But none of the above supports the abandonment of the fundamental principles and practices of public participation and environmental / impact assessment.

In brief, the following are key concerns with Bill C-5 with respect to impact assessment:

- There is no definition as to what projects would be deemed to be in the “national interest”; this leaves decisions subject to political and lobbying pressure rather than
- Cabinet has broad authority to designate projects as being in “the national interest” and place these projects on “Schedule 1” without public or Indigenous oversight or input

- Placing a project on “Schedule 1” would result in exemption from essential environmental laws including the Species at Risk Act, Fisheries Act, Canadian Environmental Protection Act and the Impact Assessment Act.
- Projects on “Schedule 1” could be exempted from any applicable federal laws
- Given the above points, Bill C-5 thwarts the rule of law and democratic process
- Exempting projects from environmental assessment and from the protections that are afforded through application of Species at Risk Act, Fisheries Act, Canadian Environmental Protection Act and the Impact Assessment Act invites environmental harm and abandons Canada’s international obligations, and our obligations to future generations

We would welcome “nation building” projects that would contribute to the health, well being and sustainability of the nation, as well as our region.

One example would be a reliable and energy efficient transportation system. In Northern Ontario we have a twice-weekly train travelling west from Sudbury Junction to western Canada, no rail connections travelling east, and a bi-weekly train from Sudbury Junction to southern Ontario. Only one major centre in all of northern Ontario – Sudbury – has rail service. This is a massive reduction from the rail options of a few decades ago when we had north-south and east-west passenger rail options on a daily basis. The same is true of many if not most regions of Canada, and just as building the initial rail line was nation-building a century and a half ago, building rail service would build our nation in this century, as would other expanded public transport services to support rural communities in northern Ontario and other regions across the country who are similarly underserved. The same could be said of communication and digital services.

Another nation building project would be to respond to the triple-threats of homelessness, affordability and the climate crisis through an integrated project to develop housing which is climate resilient, energy efficient, and not only energy self-sufficient but with residence-based renewable energy systems feeding into the local distributed grid, along with other larger and commercial scale renewable energy projects.

Interconnected distributed electricity grids would speak to your interest in making Canada an energy superpower. Our “superpowers” should be renewable, affordable and sustainable renewable energy sources. Interconnected distributed grids provide supply stability but avoid both the large costs and environmental footprint of a mega-project and large station approach, which are also more vulnerable to large-system failure.

Our final point: building faster is not building better. Building bigger is not building better. Building better means building projects which are fiscally responsible, environmentally sustainable, and socially accountable. Building a national economy must include building regional economies. Investment in value-added processing of natural resources builds local and

regional economies that are more sustainable, less susceptible to the typical boom and bust cycle of large-scale resource extraction projects and are the foundation for a sound national economy.

In closing:

- Bill 5 needs review and revision. Take the time to do it right. Send it to Committee, and hear from the public, experts and Indigenous people. Don't sacrifice our future simply in the interest of being able to claim you took rapid action.
- Nothing along the lines of Bill 5 was outlined in your election platform. Canadians placed their trust in you because you presented as a rationale thinking person who could both manage the economy and environmental responsibility.
- Northwatch supports the high-priority amendments which have been developed and put forward by Canadian Environmental Law Association, Ecojustice, West Coast Environmental Law, David Suzuki Foundation, and other non-governmental organizations across Canada.

We await positive word that Canadians and Indigenous peoples will be heard, and that you will slow the progress of Bill C-5 to allow discussion and debate, or that you will withdraw the Bill in response to what you have heard in the short time between tabling the Bill on June 6th and today.

Thank you for your consideration.

Sincerely,



Brennain Lloyd
Northwatch Project Coordinator

cc. Members of Cabinet
 Secretaries of State
 Members of Parliament