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Nov. 11, 2024

The Honourable Steven Guilbeault  
Minister of Environment and Climate Change  
House of Commons  
Ottawa, Ontario K1A 0A6

Dear Minister,

We are extremely concerned about the environmental damage that will occur as a result of the Government of Ontario building the proposed Highway 413.

We had hoped that the process of collaboration between the Government of Ontario and the Federal Government, set out in the April 29, 2024 Canada-Ontario Memorandum of Understanding, would have provided some significant research, restraint and, maybe, reconsideration of this project. However, the intentions of the Government of Ontario have been made very clear. Ontario's Minister of Transportation Prabmeet Singh Sarkaria, in announcing Bill C212 (*Reducing Gridlock, Saving You Time Act*) said "I think it is a very clear message that we will do anything and everything to get this highway built."

Such an attitude and intention are entirely at odds with the wording and the spirit of the Memorandum of Understanding (MoU). It speaks of a mutually respectful process of considering the responsibilities of the Federal Government to uphold the Fisheries Act, the Species at Risk Act, the Migratory Birds Convention Act and the Canadian Navigable Waters Act.

**The MoU clearly maintains the federal government's power to designate the 413 project for a full federal impact assessment**, and prevent it from moving forward in any form that could harm species at risk or otherwise have adverse effects within federal jurisdiction.

However, in Bill C212, unappealable powers of compulsory purchase of land necessary for the building of the 413 are to be enforced immediately; a 24/7 construction program is to begin as soon as possible, even before an Indigenous Consultation Plan has been developed, and the highway is to be exempt from an Ontario Environmental Assessment. It would seem, on the evidence of these features of Bill C212, that it is, in fact, the intention of the Government of Ontario, to disregard the provisions of the MoU. In other words, to abandon it.

Minister, we hope that Bill C212 will concern you as deeply as it does us and that, therefore, **you will make it very clear to the Government of Ontario that the abandonment of the principles and procedures of the MoU will not be accepted by the Federal Government.**

We expect that the federal ministries will **not issue any permits allowing work on the highway to begin before a full federal impact assessment is completed.** Further, we expect that the expert research into the environmental impacts of Highway 413 and the relation of those impacts to the legal, environmental responsibilities of the Federal Government, will not be abandoned, but be rigorously carried out and enacted.

**In addition, if, in your considered opinion, Bill C212 infringes on the legal responsibilities of the Federal Government, we would urge you to take the Government of Ontario to court to have this infringement rectified.**

Respectfully,

*Jeannine d'Entremont*

Jeannine d'Entremont, Ontario Team Lead  
Halton Hills Climate Action

And the following groups:



**HeadwatersStopthe413**

Sharon Sommerville, Chair



Wendy Roberts, Chair



GRAND(M)OTHERS ACT  
TO SAVE THE PLANET

Lorraine Green, Co-Chair



Peter Appleton  
Environmental ENG, Conservation Biologist  
Greenbelt Guardians of Greater Hamilton

Lucrezia Chiappetta, Co-Chair  
ecoCaledon



Lyba Spring, Co-Chair



Gideon Forman, Climate Change and  
Transportation Policy Analyst



Tony Malfara, Chair



Ron McKee, Chair

Copies to: The Right Honourable Justin Trudeau, Prime Minister of Canada  
Mr. Terence Hubbard, President, Impact Assessment Agency of Canada  
The Hon. Jonathan Wilkinson, Minister of Energy and Natural Resources  
The Hon. Diane Lebovillier, Minister of Fisheries, Oceans and the Coast Guard  
The Hon. Gary Anandasangaree, Minister of Crown-Indigenous Relations  
The Hon. Michael Chong, P.C. MP Wellington Halton Hills  
The Hon. Adam Van Koevorden, Lib. MP Milton