



# **MANITOBA ECO-NETWORK**

302 – 583 Ellice Avenue Winnipeg, MB R3B 1Z7  
Tel: 204-947-6511 [www.mbeconetwork.org](http://www.mbeconetwork.org)

October 20, 2025

Impact Assessment Agency of Canada (IAAC)

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## **Re: Manitoba Eco-Network Response to “One Project, One Review” Co-operation Agreement Discussion Paper**

This submission contains the feedback of the Manitoba Eco-Network (MbEN) on the “*One Project, One Review*”: *Co-operation Agreements for the Assessment of Major Projects (Discussion Paper)* published by the IAAC in September 2025. We anticipate submitting additional comments once the Draft Co-operation Agreement for Manitoba is available for input.

We are also a signatory organization for the *Joint submission on Impact Assessment Agency of Canada Discussion Paper, “One Project, One Review”: Co-operation Agreements for the Assessment of Major Projects” (Joint Submission)* being submitted today by West Coast Environmental Law, the Canadian Environmental Law Association, and a coalition of other organizations in Canada.

This submission provides additional Manitoba-focused context and further elaboration on some of the main points. Overall, MbEN supports the “one project, one review” concept. However, we find the approach proposed in the *Discussion Paper* and reflected in the B.C. and Draft New Brunswick Co-operation Agreements to be inadequate and likely to result in gaps in the impact assessment (IA) and regulation of projects that could detrimentally impact the environment and the health of Manitobans.

As noted in the *Joint Submission*, there are serious concerns with the approach proposed in the *Discussion Paper* and a clear need for further development and consultation on a more detailed plan. We need a process that better captures the responsibilities of the federal and provincial government to protect the environment and human health and provides more details about the specific roles and liabilities of the different governments involved in the cooperative IA process.

We urge you to propose alternative approaches that would work best for Canadians, nature and climate, ones based in true collaboration and co-operation, sustainability, public participation and Indigenous rights.



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## **The One Project, One Review Approach:**

MbEN generally supports the “one project, one review”<sup>1</sup> concept and also views co-operation agreements as a pathway to achieving this goal. However, the IA process that occurs under a co-operation agreement needs to be focused on harmonization and have clearly defined steps, decision-making criteria, and definite roles for officials from both levels of government involved. This is particularly important since, as noted in the *Discussion Paper*, the specific assessment and approval processes developed under each co-operation agreement “may differ depending on the project, its potential impacts, and the provincial process that would apply to it.” (*Discussion Paper*) A well drafted and comprehensive co-operation agreement can help provide process certainty by setting out how jurisdictions will work together on the impact assessment of major projects.

We do not agree that co-operation agreements should be developed as a means of ensuring “accelerated assessments for nation building projects, and for all other major projects.” We also do not agree that the IAA should be used to “rely on provincial environmental assessments” as a means of achieving “one project, one review”. Instead, Manitoba needs a co-operation agreement that is focused on harmonization and the protection of the environment and human health through a clearly defined process that reflects public interests and best practices.

We also need co-operation agreements that include mechanisms to facilitate co-operation with other jurisdictions (like Indigenous governments) from all parties, not just the lead-government. Canadian co-operation agreements should “commit Canada and a province to collaborate on and coordinate meaningful communications and consultation with Indigenous Peoples during assessments.” Co-operation agreements should also include detailed provisions addressing coordination of Consultation with Indigenous rights-holders and how both parties will work to implement requirements of the *United Nations Declaration on the Rights of Indigenous Peoples Act*. Particularly when coordinating multiple types of assessments, permits, and approvals that could trigger overlapping Consultation and decision-making processes.

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<sup>1</sup> “a single assessment for all projects, in a manner that respects federal, provincial, and territorial jurisdiction, enhancing co-ordination activities on permitting and eliminating duplication.” (*Discussion Paper*)



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## **The Need for Thorough Assessment, No Exceptions:**

MbEN and our partner organizations PILC and the University of Winnipeg recently completed a law reform project, [Empowering Impact Assessment](#), that was focused on gathering public insights on Manitoba's current IA process under *The Environment Act* and identifying community priorities for impact assessment reform. Our research relied on multiple methods to address our purpose and objectives. We completed background research surrounding best practices in impact assessment and produced a series of research memos. In addition, we conducted a survey of Canadian and select international IA legislation to determine what is typically included in the scope of the assessment, and the basis on which the assessment decision is made. Concurrent with the background research, we launched a public survey in March 2025, and held a series of in-person workshops in April and May 2025.

Overall, we found that Manitoba's provincial IA process is outdated and in need of significant reform. When compared with federal IA requirements under the IAA, there are significant differences that put Manitobans at a disadvantage. For example, there are gaps in Manitoba's framework that creates a scenario where an increasing number of projects are not adequately captured by the provincial IA process. There are also significantly different levels of public access to information, including both through the federal public registry and through the decision-making reports provided throughout the federal IA process.

We heard clearly from Manitobans that they expect the protection of people and the environment through a robust provincial IA process, which incorporates meaningful public engagement and fosters trust. We also heard that Indigenous knowledge and Indigenous-led assessments must be enabled, recognized and respected when assessing the impacts of proposed projects. When it comes to federal IA and the development of a co-operation agreement with Manitoba, these same expectations apply. Manitobans ask for federal involvement because it is viewed as requiring a more detailed level of information, a higher level of environmental protection, better access to information, and stronger licensing requirements. Monitoring, follow-up, and enforcement activities at the federal level are also viewed as better in comparison to Manitoba. A cooperative approach to IA in Manitoba could help establish a higher standard of IA in our province and ensure better protection of local citizens and the environment.



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After all of our work in the community, MbEN does not view IA as an obstacle to development, or as something that should be rushed through in order to secure a project's approval. Instead, IA is a process meant to protect and inform citizens and fulfill government responsibilities. It is also an important evaluation of whether or not a project should be allowed to proceed. As recently reported by the Special Rapporteur on the human right to a clean, healthy and sustainable environment, Astrid Puentes Riaño (2025) there is a problematic pathway that more and more governments around the world are taking when it comes to the impact assessment and approval of natural resource developments. The Special Rapporteur's [report](#) describes how some States have exempted entire sectors and projects from impact assessment requirements, including those developments that are primary drivers of the climate, biodiversity and pollution crises. These exceptions “often lack scientific basis”, for example, many Governments have cited “purported national, security or public interest needs without a proper analysis of proportionality, actual need and opportunity, thus avoiding impact assessment requirements, in contravention of international law.” (Riaño 2025)

This is scarily similar to the rhetoric and proposed changes to the federal impact assessment we are seeing increasingly emphasized by elected officials at all levels of government. However, as noted by the Special Rapporteur, “Governments have an obligation to ensure that impact assessments occur in a comprehensive and integrated manner, considering cumulative impacts.” (Riaño 2025) When it comes to impact assessment, “the duty of States includes regulating, undertaking, monitoring and enforcing these processes and ensuring adequate access to information, public participation and access to justice and effective remedies.” (Riaño 2025) Thus, granting exceptions to the IA process or a pathway to automatic approval, particularly for activities with detrimental and disproportionate environmental impacts, would result in a violation of a State's duty to protect the human rights to a healthy environment and to life, and other rights. (Riaño 2025)



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To properly fulfill their legal obligations, the UN Special Rapporteur emphasized the need for States to evaluate activities and projects that may cause significant harm to the environment and the climate, including but not limited to the following:

- Fossil fuel exploration, extraction and use;
- Chemical and petrochemical production and recycling facilities;
- Industrial agriculture and other land-use changes;
- Industrial aquaculture and industrial fishing;
- Large infrastructure and energy developments;
- Metal ore and rare earth element mining, and the mining of other materials such as sand and gravel;
- Climate and energy transition projects<sup>2</sup>;
- Wastewater treatment, sewage systems and industrial effluent outlets;
- Waste management, including municipal, industrial, electronic and hazardous waste, incineration plants and large-scale composting;
- Metallurgical smelters, cement and lime factories and pulp-and-paper mills;
- Battery manufacturing and recycling, and data centres. (Riaño 2025)

Based on these understandings and the feedback of Manitobans, MbEN views impact assessment as an important mechanism to help protect the environment and human health. There are public expectations that governments at all levels are working towards stronger environmental protections, and based on recent interpretations of international and domestic law, Canadian governments are also legally responsible and obligated to do so. Moving forward, all co-operation agreements, including Manitoba's, should reflect these legal obligations and responsibilities to protect the environment and human health first, and ensure all governments involved are effectively contributing when a coordinated IA takes place.

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<sup>2</sup> "such as wind, solar, geothermal and others; and mitigation, such as geoengineering, including in marine areas and applying a precautionary principle, and adaptation actions." (Riaño 2025)



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## **The Process for Developing Co-operation Agreements:**

While MbEN appreciates this opportunity to provide feedback on the *Discussion Paper*, there is a need for a more meaningful public consultation process both for the overall approach taken by the IAAC and the individual consultations needed for each draft agreement. So far, consultation opportunities have been rushed and overlapping. For example, this consultation period and the comment period for the [Draft New Brunswick Agreement](#) are happening at the same time. Comments were also due before applicants received confirmation of possible participant funding.

The involvement of other levels of government in the development of co-operation agreements, like the Government of Manitoba, is also very unclear. A co-operation agreement involves two parties. However, so far we have only seen the discourse of one party, the federal government, about the development of co-operation agreements, and there have been no corresponding consultation processes occurring at the provincial level, or coordinated between the two jurisdictions theoretically involved. For example, nothing comes up in the Manitoba Public Registry or on the EngageMB website.

We need more information about the role of the provinces and how both levels of government are facilitating a meaningful public consultation process. We agree that provincial governments have an important role to play in the IA of major projects. However, when it comes to jurisdictions with outdated IA processes (such as Manitoba), we urge you to make sure one province doesn't end up disproportionately bearing the burden of environmental and health impacts for projects meant to benefit other jurisdictions. Thus, we need a robust and meaningful public participation process, from all jurisdictions involved, that ensures the voices of those most impacted are amplified and supported (e.g., through participant funding).

MbEN also notes the importance of all Canadian governments doing all they can to ensure that IA processes, even when executed through a Co-operation Agreement, are a vehicle that can inform and assist meaningful Consultation and the Free, Prior and Informed Consent of Indigenous peoples.



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## **Development of Co-operation Agreements so far:**

MbEN has concerns with the approach taken so far with the B.C. and Draft N.B. Co-operation Agreements. There is no indication between the two, or through the *Discussion Paper*, of a basic standard of IA that must be met to ensure federal legal obligations are fulfilled. There needs to be a basic standard established to guide the development of future co-operation agreements and allow for effective evaluation of the IA outcomes facilitated by individual agreements. MbEN is also concerned because the Draft N.B. Co-operation Agreement is largely silent on many of the elements typically included in past harmonization agreements.<sup>3</sup>

The *Discussion Paper*, Draft N.B. Co-operation Agreement and existing agreements under the IAA also do not provide information about how the IAAC has assessed the adequacy of provincial IA regulatory requirements. This analysis should be publicly available so Manitobans can be assured that the IAAC actually understands Manitoba's process and has engaged with the local experts and organizations who work day-to-day within the provincial IA framework. Unfortunately, in the past there have been numerous situations where the decision not to undertake a federal impact assessment for a project appears to have been based on inaccurate information. For example, the Vivian Sand Extraction Project, which should have triggered the federal IA process, was found not to need a federal IA since the provincial process adequately addressed potential adverse effects.<sup>4</sup> However, when the Clean Environment Commission reviewed the IA data for the Vivian Sand Extraction Project during a public hearing, they found that a number of potential impacts had been inadequately assessed, including cumulative effects.<sup>5</sup> From a Manitoba perspective, there seems to be an ongoing disconnect between what the Federal Government thinks the provincial IA process under *The Environment Act* does, and what it actually does, in terms of how effectively the environment and human health is protected.

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<sup>3</sup> For more analysis of past Canadian Co-operation Agreements and discussion of best practices, see: Fitzpatrick et. al. 2024; Fitzpatrick et. al. 2021; Fitzpatrick and Sinclair, 2016; Fitzpatrick and Sinclair, 2009; and Fitzpatrick and Sinclair 2005.

<sup>4</sup> IAAC, Minister's Response, Vivian Sand Project (2021), <https://iaac-aeic.gc.ca/050/evaluations/document/142317>

<sup>5</sup> Clean Environment Commission, *Report on the Vivian Sand Extraction Project* (2023), [https://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/cec\\_vivian\\_sands\\_extraction\\_project\\_report.pdf](https://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/cec_vivian_sands_extraction_project_report.pdf)



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Moving forward, more work needs to be done so the procedural elements of cooperative IA processes are transparent and more clearly identified in the main body of co-operation agreements, including identification of the common criteria that will be used by all parties during the assessment. There is also more information needed about the involvement of provincial governments and how legal requirements in both jurisdictions will continue to be met.

## **What Should Co-operation Agreements Contain?**

While MbEN understands there is a need to tailor the specifics of a co-operation agreement to reflect the respective legal requirements of each jurisdiction and the public interests of local citizens and Indigenous rights-holders, there are a number of general components that should be included in Canadian co-operation agreements to ensure robust protection of the environment and human health.

### **A) Guiding Principles and Scope:**

MbEN strongly recommends the development of clear guiding principles that lay out the framework of goals and objectives for all co-operation agreements. There are lots of existing options that could be pulled from previous co-operation agreements, best practice literature, and the recommendations of the participants in this consultation process.

Although the *Discussion Paper* identifies some of the principles that should guide federal IA and the development of co-operation agreements, there is a need for further work in this area to better capture the full scope of issues and approaches that should be included. This includes the need to work in partnership with Indigenous-rights holders and support the development of Indigenous-led IA processes; meeting climate commitments, protecting biodiversity, and ensuring meaningful public engagement, among others.

In the *Joint Submission* we signed-on to, suggested objectives are meant to guide the development of Co-operation Agreements related to sustainability, transparency, fairness and credibility. For additional sources of inspiration, there are a number of helpful principles and objectives articulated in the CCME's 1998 [Harmonization Accord](#), the [Annex to Accord](#), and the Sub-Agreement on [Environmental Assessment](#). The Accord and Associated Sub-Agreements support the development of IA processes that "contribute[s] to the vision of the highest level of environmental quality in Canada, and to a future based on the principles of sustainable development." (CCME 1998a)



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There are also objectives and standards that could be drawn from the many layers of legal requirements that governments must fulfill in order to meet their legal obligations. For example, the 2023 Supreme Court of Canada Decision in *Reference Re: Impact Assessment Act* underscored the need for federal and provincial governments to work together on impact assessment in the spirit of co-operative federalism. Despite the seeming misinterpretation of this decision to support efforts to reduce IA requirements, the federal government is still required to satisfy the requirements of the *Impact Assessment Act*. It cannot just offload its obligations on provincial governments. Both levels of governments have their own constitutional obligations to uphold, which is why the development of co-operation agreements should be focused on harmonizing the process to ensure individual and mutual legal obligations are fulfilled.

In terms of the scope of IA processes under co-operation agreements, there is a need to ensure the IA process fulfills all applicable legal requirements - international, federal, and provincial. For example, to ensure IA processes respect human rights and other international obligations, the UN Special Rapporteur has recommended that impact assessment processes:

- a) Be undertaken as early as possible and prior to any proposal authorization or the commencement of any activity, or when significant modification and/or expansion is proposed;
- b) Assess proposals' direct, indirect, domestic, transboundary, adverse, positive, cumulative, comprehensive, long-term, short-term, climate, biodiversity, environmental, health, cultural, social and human rights impacts, alongside proposals' compatibility with the State's international legal obligations and policies;
- c) Follow precautionary, prevention, proportionality, best-available science, maximum disclosure and equity and non-discrimination principles;
- d) Be prepared by independent, qualified experts;
- e) Ensure understandable, accessible, timely and complete information relevant to the proposal and assessment process;
- f) Provide effective, meaningful, open and inclusive public participation throughout each stage of the assessment process, including the monitoring of approved projects according to the terms and conditions of approval;
- g) Ensure access to justice and effective remedies, including for violations of assessment procedures and foreseeable human rights violations;
- h) Ensure special measures for the protection of the rights of marginalized people and groups. (Riaño 2025)



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## **B) No Substitution!**

MbEN does not support co-operation agreements that are focused on substitution, particularly when it comes to Manitoba's future Agreement. In our opinion, substitution does not create the co-operation that is needed for a robust assessment of projects with potential detrimental effects in multiple jurisdictions. As noted in the *Joint Submission*, the third option presented in the *Discussion Paper - Substitution to a Harmonized Process* - has some potential in terms of facilitating a harmonized IA process. However, the *Discussion Paper* lacks a number of critical details about how project-specific harmonized processes will be established under the IAA and provincial assessment regimes.

While the “substitution to a harmonized process”, introduced in 2024 amendments to the IAA is considered to be *de facto* harmonization, there is a need for future amendment of the IAA so true harmonization is possible under the Act. Harmonized impact assessment (also referred to as “coordinated assessment”) has been recognized by IA experts as the most effective cooperative IA approach in Canada. (Fitzpatrick et. al. 2024; Fitzpatrick et. al. 2021) The Development of Harmonized IA processes through co-operations agreements would be an important step forward to ensuring that future IA's take place in a way that meets the legal obligations of all parties involved. This will require clearly defined roles and responsibilities to help protect governments at both levels from future lawsuits initiated based on a failure to protect legal rights and public interests.

## **C) Accountability and Transparency:**

When developing co-operation agreements moving forward, transparency and the accountability of all stakeholders should be emphasized. For example, co-operation agreements should clearly define the roles and responsibilities of the government officials involved from both levels of government. Clear criteria should be published to help determine which level of government should be responsible for the various steps of the harmonized IA process. For example, the CCME recommends governments consider the following criteria when assigning responsibility:

- scale, scope and nature of environmental issue,
- equipment and infrastructure to support obligations,
- physical proximity,
- efficiency and effectiveness,
- human and financial resources to deliver obligations,
- scientific and technical expertise,
- ability to address client or local needs, and
- interprovincial/interterritorial/international considerations. (CCME 1998a)



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There is also a need for decision-making criteria and reporting requirements to provide insights about the way other decisions are going to be made under co-operation agreements, including how the specific information received by decision-makers will be weighted.

It would also be helpful if the IAAC developed a mechanism to track how IA Co-operation Agreements are actually working. For example, the IAAC could develop a tracking program to document the successes and limitations of each Agreement (including analysis of any IAs conducted under them), with publicly available results. Another possible option is to include an expiration date (e.g., term of 5-10 years) and a mandatory review clause in new Co-operation Agreements. This creates an important opportunity to reflect on the success and weaknesses of the specific Agreement when it expires and allows for adjustments to be made when the parties meet to renew the Agreement.

Overall, there are many options for improving the accountability and transparency of the harmonized IA processes that should take place under Co-operation Agreements.

## **D) Access to Information and Public Participation**

Coordinated IA is often complex and involves process uncertainty. (Fitzpatrick et. al. 2024; Fitzpatrick and Sinclair 2005, 2009, 2016) It is important for regulators to be transparent about the process steps to be followed, and to provide capacity building resources, if needed. For example, some of the early coordinated assessments in Canada included a class for practitioners and government officials to train them on how to be involved in the review process (e.g., The Sable Gas Project). (Fitzpatrick et. al. 2021) Unfortunately, the *Discussion Paper* and corresponding public information about the development of co-operation agreements does not contain adequate detail to fully understand the approach that the IAAC intends to take. As discussed earlier in this submission, the public engagement process has also been problematic in terms of the short timeline and overlap with other relevant consultations. Thus, one of MbEN's biggest concerns with the development of co-operation agreements under the IAA, besides the seeming emphasis on substitution, is the lack of public information and meaningful opportunity to engage in the process.



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Moving forward, there is a need for the IAAC and participating provincial governments to ensure new co-operation agreements are as detailed as possible, ensure robust public access to information, and provide capacity building measures, including mandatory participant funding for the public and Indigenous rights-holders. The IAAC and participating provincial governments should also consider developing public, plain language educational material about the creation and application of co-operation agreements.

In terms of access to information, the IAAC also needs to clarify how the public will be able to get information about the assessment and licensing of projects that undergo the coordinated IA process. For example, without proper coordination and communication to members of the public, citizens may have to check three to four public registries at different levels of government, minimum, to access information and find out how to participate in IA processes. Will information be available in all respective registries (e.g., Canadian Impact Assessment Registry, Provincial IA registry, Major Projects Registry)? Will there be one primary registry identified? What information will be contained in the public registry/registries? For example, where will monitoring and follow-up information be available? More details are needed.

Overall, MbEN wants to see robust access to information and meaningful public participation in all aspects of the IA process, regardless of which government is the “lead”.



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## Conclusion:

MbEN is supportive of the concept of “one project, one review” and the use of co-operation agreements as a pathway to achieve this goal. However, we have serious concerns with the approach proposed in the *Discussion Paper* since it is likely to result in the assessment and regulation of projects in ways that could detrimentally impact the environment and the health of Manitobans.

MbEN does not support co-operation agreements that are focused on substitution. Substitution is inadequate. Manitoba’s provincial IA process is outdated and in need of significant reform and should not be relied upon for the assessment of major projects. Instead, we want to see a harmonized IA process implemented through future co-operation agreements. This would be an important step forward to ensuring that future IA’s take place in a way that meets the legal obligations of all parties involved. Manitoba’s Co-operation agreement should be different from the B.C. and Draft N.B. Agreement and instead focus on creating a harmonized approach. There is also a need for governments at all levels to work with Indigenous rights holders and governments to incorporate mechanisms that facilitate Indigenous-led IA processes.

Manitobans want to see movement in a better direction, with more focus on the protection of the environment, rather than streamlining project approvals. We want Co-operation Agreements that clearly set out how Governments are going to collaborate and ensure there are no gaps in the regulatory framework so thorough and robust IA occurs.

Unfortunately, the priorities of Manitobans do not seem to be reflected in the *Discussion Paper* or N.B. Draft Agreement. As a result, we recommend further work on the IAAC’s approach to co-operation agreements. When developing co-operation agreements in the future, emphasis should be on harmonization and the protection of people and the planet.

In conclusion, we concur with the *Joint Submission*:

“We urge you to go back to the drawing board and propose alternative approaches that would work best for Canadians, nature and climate, ones based in true collaboration and co-operation, sustainability, public participation and Indigenous rights.”



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We welcome future opportunities to engage with the Impact Assessment Agency of Canada to ensure the highest level of environmental and health protection measures are implemented for the benefit of current and future generations.

Sincerely,

Heather Fast, J.D., LL.M., Policy Advocacy Director

A handwritten signature in black ink that reads "Heather Fast".

James Beddome, LL.B., Executive Director

A handwritten signature in green ink that reads "James Beddome".

## **About Manitoba Eco-Network:**

The Manitoba Eco-Network is a non-profit registered charity which seeks to strengthen Manitoba's environmental community with the goal of protecting our environment for the benefit of current and future generations. We serve as an umbrella for environmental non-governmental organizations across the province. Our mission is to promote good environmental governance, support and build capacity, advocate for environmental justice, and act as a bridge between environmental organizations, the public, and all levels of government.

## **Resources**

Canadian Council of Ministers of the Environment. (1998). *Canada-Wide Accord on Environmental Harmonization*. [CCME 1998a]

Canadian Council of Ministers of the Environment. (1998). *Annex to the Canada-Wide Accord on Environmental Harmonization*. [CCME 1998b]

Canadian Council of Ministers of the Environment. (1998). *Sub-Agreement on Environmental Assessment*. [CCME 1998c]

Fitzpatrick, P., H. Fast, K. Dilay and J. Beddome. (2025) *What Manitobans Expect: Findings from the Impact Assessment Reform Project*. The University of Winnipeg: Winnipeg MB. [Forthcoming on Oct. 30, 2025]



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Fitzpatrick, P., Kwasniak, A., & Sinclair, A.J. (2021) "Putting Multi-jurisdictional Impact Assessment into Action Under the Impact Assessment Act." In M. Doelle & A.J. Sinclair (Eds.), *The Next Generation of Impact Assessment: A Critical Review of the Impact Assessment Act* (pp. 165–193). Toronto: Irwin Law, 2021.

Fitzpatrick, P., & Sinclair, A. J. (2005). Multi-jurisdictional environmental assessment. In K. Hanna (Ed.), *Environmental impact assessment: Process and practice* (pp. 160-184). Toronto, ON, Canada: Oxford University Press.

Fitzpatrick, P., & Sinclair, A. J. (2009). Multi-jurisdictional environmental impact assessment: Canadian experiences. *EIA Review*, 29, 252-260.

Fitzpatrick, P., & Sinclair, A. J. (2016). Multi-jurisdictional environmental assessment in Canada. In K. Hanna (Ed.), *Environmental impact assessment: Process and practice* (3rd ed., pp. 182-197). Toronto, ON, Canada: Oxford University Press.

Fitzpatrick, P., Alan Bond and A. John Sinclair, (2024) "Crossing boundaries and jurisdictions: implications for public participation highlighting Canada and Europe" in Tanya Burdett and A. John Sinclair (eds) *Handbook of public participation in Impact Assessment* (Edward Elgar Publishing).

IAAC (2025) "*One Project, One Review*": *Co-operation Agreements for the Assessment of Major Projects*. Government of Canada.

IAAC (2025) *Draft Co-operation Agreement between New Brunswick and Canada on Environmental and Impact Assessment*. Government of Canada.

Riaño, A.P. (2025) *Report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment, Astrid Puentes Riaño: Framework for environmental, social and human rights impact assessments and the right to a clean, healthy and sustainable environment*. United Nations, A/80/187.