


How to Engage with Environmental Policy: A Guide for Citizens

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<p>Summary</p>	<p>There are many ways that individual people can contribute to environmental action: waste reduction, home gardening, participating in protests, and conscious consumerism, to name a few. One channel that often gets little attention in this regard is direct engagement with environmental policy. Besides voting, what policy engagement opportunities are available to citizens? How can they take advantage of these opportunities, and which are most meaningful? This report introduces the reader to the topic of citizen engagement, surveys a broad range of possible environmental policy engagement opportunities, provides in-depth information on the most direct opportunities (i.e. petition processes, city council meetings, parliamentary committees, open consultations, environmental assessments), and concludes with other considerations and broader questions.</p>

Note about EPILab

The [Environmental Policy Innovation Lab](#) (EPILab) is an initiative of the [Environmental Policy Institute](#) (EPI) at the Memorial University of Newfoundland's Grenfell Campus in Corner Brook, Newfoundland and Labrador, Canada. It is a space for innovation and collaboration around environmental policy thinking and research, which draws on the expertise of faculty, graduate students, and other researchers in order to engage EPI's external partners.

1. CONTEXT AND METHODS

This report was developed through EPILab over the period of February through August of 2020. The objective is to provide information on available channels through which citizens can engage with environmental policy decisions. It includes general lessons and observations that may be applicable to a variety of organizations and jurisdictions, but pays particular attention to the research needs of the Western Environment Centre and the community context of Corner Brook (and by extension the broader contexts of the province of Newfoundland and Labrador and the country of Canada).

The research method for this report was a broad literature and document review, using general internet and library searches for keywords relevant to citizen engagement and public participation. Compiling the final document also incorporated original analysis by the authors and involved checking certain pieces of information with key contacts.

2. DEFINITIONS

There are many terms related to citizen engagement, and they are often used interchangeably. However, the distinctions between the definitions of different terms can be very useful for understanding the nuances of citizen engagement. We define a few key terms here, and highlight the differences between them.

Citizen Engagement/Public Engagement: Processes through which governments encourage citizens to become informed, provide input, deliberate, and reflect on policy issues (Kraft and Marks 2011, p. 9). A typical example would be a

government-hosted consultation meeting in a community likely to be affected by a pending policy decision.

Citizen Participation: Citizen-initiated processes of interaction between citizens and government. One difference between citizen engagement and citizen participation is that the former is government-initiated and the latter is citizen-initiated. As a result, citizen participation may be less formal—examples include neighbourhood networks and petitions (CitizenLab 2019).

So, the essential distinction between these two terms is who initiates the interaction between government and citizens. Although the target audience of this report is citizens interested in how to engage with environmental policy, both types of processes are relevant opportunities for interaction. For some additional relevant definitions, see the Appendix.

3. CONTEXT OF CITIZEN ENGAGEMENT IN NEWFOUNDLAND AND LABRADOR

Government departments can choose to pursue citizen engagement initiatives at any time, just as citizens can pursue citizen participation initiatives at any time—that is, interactions between governments and citizens do not necessarily require specific departments or organizations with a focus on engagement. However, there are certain institutions designed to make citizen engagement easier, and being familiar with these institutions at each level of government can be very helpful to citizens who want to get involved with policy processes. For example, the Government of Canada currently has an [Open Dialogue initiative](#), which is part of the Open Government approach initiated in 2013. This initiative hosts a centralized list of the various ways that citizens can engage with policy and program development, such as participating in consultations and commenting on proposed regulations.

Similarly, at the provincial level, the Government of Newfoundland and Labrador has the [engageNL portal](#), which is part of the Office of Public Engagement created in 2012. The portal lists current and past citizen engagement opportunities.

It is also valuable for interested citizens to become familiar with the basic structures of government at the federal, provincial, and municipal levels. Governments are typically made up of three branches: the legislative branch (makes laws), the executive branch (implements laws and conducts day-to-day governance), and the judicial branch (interprets laws). The table below outlines the three branches of government at three levels of government.

In general, some excellent starting points for interested citizens to participate in policy processes are the engagement-focused institutions (i.e. Open Dialogue and engageNL) and the legislative bodies of government (e.g. parliamentary assemblies and city councils).

	Legislative	Executive	Judicial
Federal (Canada)	<ul style="list-style-type: none"> • House of Commons • Senate 	<ul style="list-style-type: none"> • Prime Minister • Federal Ministers • Federal Departments and Agencies 	<ul style="list-style-type: none"> • Federal Courts
Provincial (Newfoundland and Labrador)	<ul style="list-style-type: none"> • House of Assembly 	<ul style="list-style-type: none"> • Premier • Provincial Ministers • Provincial Departments and Agencies 	<ul style="list-style-type: none"> • Provincial Courts
Municipal (Corner Brook)	<ul style="list-style-type: none"> • City Council 	<ul style="list-style-type: none"> • Mayor • Municipal Departments 	<ul style="list-style-type: none"> • N/A (but some cities have municipal courts)

4. POSSIBLE OPPORTUNITIES FOR ENVIRONMENTAL POLICY CITIZEN ENGAGEMENT

As explained above, some opportunities for citizen–government interaction are government-initiated (i.e. citizen engagement) and some are citizen-initiated (i.e. citizen participation). These categorizations can be broken down further into a range of opportunities that vary in terms of whether and how much the impetus comes from government or citizens:

- A. wholly citizen-initiated processes
 - e.g. awareness campaigns meant to capture the government’s attention broadly
- B. processes that are made possible by government but depend on citizen initiative
 - e.g. formal processes for submitting petitions to legislative assemblies
- C. government-initiated processes that allow for some initiative from citizens
 - e.g. open consultations where citizens must register themselves to participate
- D. wholly government-initiated processes
 - e.g. consultations where only specific stakeholders are invited

Because the target audience of this report is citizens interested in how to engage with environmental policy, the focus of this section will be opportunities requiring a mixture of government and citizen initiative (i.e. categories B and C). Wholly citizen-initiated processes (i.e. category A)

can take so many different forms that it is not feasible to attempt a comprehensive account in this report—examples might include protests, letter-writing campaigns, social media groups, study circles, network building, and general activism. Comparably, there is not much citizens can do to prepare for or take advantage of wholly government-initiated processes (i.e. category D), although there are several interesting examples of such: stakeholder consultations, citizen juries, deliberative polls, public dialogues, and citizen advisory groups.

The remainder of this section provides detail on the following opportunities, organized in order from more citizen-initiated processes to more government-initiated processes:

- submitting petitions through formal channels
- speaking to a city council
- submitting briefs or witness accounts to parliamentary committees
- participating in open consultations
- commenting on environmental assessments

Petitions

The Canadian House of Commons has a formal process for both paper petitions and e-petitions. A paper petition requires at least 25 signatures; it can then be sent to a Member of Parliament, who may present it to the House of Commons for a response. E-petitions have a more complex process, but have the potential to gather many more signatures. An e-petition must first be drafted and gather the preliminary support of 5 people; it can then be sent to a Member of Parliament for authorization. If it passes the initial steps, it will be hosted

on the e-petition website for a period of up to 120 days, during which anyone may sign it electronically. If it gathers at least 500 signatures during this time, it will be presented to the House of Commons for a response. Over 1500 petitions are presented to the House of Commons each year. See the [House of Commons petitions website](#) for specifics about the process, guidelines for petitions, and other information.

The Newfoundland and Labrador House of Assembly has a similar process, but it is less formalized and only accepts paper petitions. Once the petition is complete, it can be sent to a Member of the House of Assembly, who may present it to the House. See the [House of Assembly petitions website](#) for specifics about the process, a template for petitions, and other information. At both the federal and provincial levels, time is regularly devoted to the presentation of petitions (and tabling of responses to petitions) during the “routine proceedings” segment of sittings of the House.

As an example at the municipal level, the City of Corner Brook also has a process for presenting petitions to City Council. A petition must include the standard information required by most government petitions (e.g. names, addresses, signatures, and dates for each signatory), must be submitted to the City Clerk several days prior to a public City Council meeting, and must designate a spokesperson who will speak to the issue at the meeting. If all requirements are met, the spokesperson will be allowed to speak at the City Council meeting for 5 minutes. Much like at the other levels, presentation of a petition is not usually followed by a debate; rather, the petition is “tabled” and will receive

a written response at a later time. For more information about the specifics of the process, contact the City Clerk with questions or to request the Council Rules of Procedure (use the email address listed on the [City of Corner Brook contact page](#)).

City Council

Municipalities large enough to hold regular city or town council meetings generally have channels through which interested citizens can speak to the council on an issue of concern. For the City of Corner Brook, one way that citizens can speak to City Council is by presenting a petition, as described above. Another way is through a delegation. This is similar to the petition process (e.g. submit a request and justification in writing to the City Clerk several days in advance of the meeting), except that delegations meet with Council during non-public meetings, get 20 minutes to present instead of 5, may use a slide deck in their presentation, and are more likely to get questions from Council after the presentation. For more information about the specifics of the process, contact the City Clerk with questions or to request the Council Rules of Procedure (use the email address listed on the [City of Corner Brook contact page](#)).

Parliamentary Committees

All parliamentary assemblies in Canada (e.g. the House of Commons, the Senate, provincial legislatures) have committees, which allow a smaller subset of elected officials to consider certain issues in greater depth than the entire assembly. These are typically divided into standing (i.e. permanent) committees that consider topics perpetually of interest to government (e.g. environment, health,

industry) and a small number of special (i.e. temporary) committees that consider topics which require additional attention in the short term (e.g. Canada–China relations, COVID-19 pandemic). Note that committees are only active when the parliamentary assembly is active (i.e. sitting).

The Canadian House of Commons has several standing committees relevant to environmental policy: Agriculture and Agri-Food, Environment and Sustainable Development, Fisheries and Oceans, Indigenous and Northern Affairs, and Natural Resources, to name a few. A set of [practical guides](#) on the House of Commons website describes the ways that citizens can participate in committee considerations.

Individual citizens may be invited to appear before the committee on a particular issue (i.e. a government-initiated process) but citizens can also submit briefs or request to appear before the committee (i.e. citizen-initiated processes). Briefs may be up to 10 pages in length, and can be submitted to the relevant committee’s clerk, but it is up to the committee leadership to decide whether to distribute the brief to committee members. A request to appear (and justification) can similarly be sent to the clerk. If the request is granted, the witness is usually expected to prepare a brief in advance of the appearance and must also submit the speaking notes they plan to use. On the day of the meeting, they will first address the committee through an opening statement (5 to 10 minutes; audiovisual equipment is allowed), and then most of the appearance will entail a question-and-answer period. In any case, to participate it will be necessary to know what matters each committee is currently

considering, which can be found on the “Work” subsection of the committee’s webpage (e.g. [see the webpage for the Environment and Sustainable Development committee](#)).

Also at the federal level, the Senate has standing committees on Agriculture and Forestry; Aboriginal Peoples; Energy, the Environment, and Natural Resources; and Fisheries and Oceans. The processes for citizen participation are comparable to the House of Commons committees, generally involving contact with the relevant committee’s clerk, and a [similar guide](#) clarifies how citizens can provide both written and oral evidence. It is also possible to view the current and past work of each committee (e.g. see the [webpage for the Energy, Environment, and Natural Resources committee](#)).

The Newfoundland and Labrador House of Assembly has [relevant standing committees](#) as well, including the Social Services Committee (one subject area covered is the environment) and the Resource Committee (one subject area covered is natural resources). However, there does not appear to be any standardized or advertised process for participating as a witness or submitting a brief.

Open Consultations

The Government of Canada’s [Open Dialogue initiative](#) has two useful lists of opportunities for the public to engage with ongoing consultations: the government consultations database and the list of proposed regulations for public comment. The [consultations database](#) is a curated inventory of links to many different consultations held by many different

government departments for many different reasons, each of which may have its own processes and format (and some of the links may thus be broken). It goes so broad as to even include some of the regulation and assessment comment opportunities discussed below. Some opportunities may be as simple as filling out a survey (e.g. see “Protecting Canada’s Fresh Waters”), while others may be considerably more complex, involving multiple iterations and types of consultation (e.g. see “Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador”). The database has a search function, but by default lists the consultations in this order: a moderate number of currently open consultations, a small number of planned (i.e. future) consultations, and a large number of closed (i.e. past) consultations.

Comparatively, the [list of proposed regulations](#) is much simpler; it only includes a small number of regulations currently open for comment. Each link typically includes instructions for how to submit comments to the relevant person. At the time of this writing, one example is “Clean Fuel Regulations”.

At the provincial level, [engageNL](#) is comparable to the federal Open Dialogue initiative. It lists current and past opportunities for engagement. At the time of this writing, opportunities range from completing questionnaires to submitting written comments to signing up for a presentation at a public session—a current example issue is the “Protected Areas Plan for the Island of Newfoundland”. One can also “register” with engageNL to regularly receive updates and other materials.

Environmental Assessments

An environmental assessment is a government process that must be undertaken by any project (public or private) with potential adverse environmental impacts; approval must be granted before the project can commence. Both the federal and provincial levels of government in Canada have environmental assessment processes. This is because the “environment” is not explicitly mentioned in Canada’s constitution (which divides powers between Canada’s federal and provincial levels) and thus is essentially an area of shared jurisdiction. Projects with potential environmental impacts generally undergo the provincial assessment process, but may undergo the federal process instead (or in addition) if the project involves the federal government, federal lands, or areas under federal jurisdiction (e.g. Indigenous Peoples, fisheries).

The [Impact Assessment Agency of Canada](#) is responsible for federal environmental assessments. It has several resources that may be helpful to citizens interested in engaging with the process, including a [comprehensive guide to public participation](#). The guide clarifies how the public can participate at five different points in the environmental assessment process for a given project: the planning phase (comment on whether an assessment is required), the guidelines phase (comment on what should be considered in the assessment), the impact statement phase (participate in activities led by the project proponent or the Assessment Agency to determine potential impacts), the impact assessment phase (comment on the impact statement), and the decision phase (comment on the government’s decision and potential

amendments to that decision). There is also a [registry of current assessments at various phases](#), which includes a map and list of projects by province, and a [resource on funding programs to support participation](#).

The [Department of Environment, Climate Change and Municipalities](#) is responsible for provincial environmental assessments. It does not have a public participation guide, but does have a [short guide for project proponents](#), which includes some broader information about the process. After a proponent registers their proposed project, there is a 35-day period during which members of the public can make comments on the registration document by emailing [EProjectcomments\[at\] gov\[dot\]nl\[dot\]ca](mailto:EProjectcomments@gov.nl.ca). Projects are typically approved by the Department at this point, but it may decide that a more detailed environmental impact statement is required and then prepare individualized guidelines for proponent, which are also subject to a public comment period. Preparing the impact statement may take the proponent a few months, and requires them to implement a public information program about the proposed project for the relevant area, which may result in additional submitted comments. Finally, the completed impact statement is subject to a public comment period as well.

In summary, there are several different ways for the public to engage with provincial environmental assessments, but commenting on initial registration documents appears to be the main way (or at least the first step). A [registry of current and past projects](#) is available. Interested citizens can also follow the “Environmental Assessment Bulletin” items in the [provincial government’s news releases](#) to receive updates on all ongoing projects.

5. SUMMARY AND CONCLUSION

The objective of this report was to provide information on available channels through which citizens can engage with environmental policy decisions, while acknowledging the community contexts of the City of Corner Brook, the province of Newfoundland and Labrador, and the country of Canada. There are many such channels across multiple levels of government (i.e. municipal, provincial, federal). Some opportunities are more government-initiated and others are more citizen-initiated. Wholly government-initiated processes are not possible for citizens to pursue actively, while wholly citizen-initiated processes are too numerous and varied to account for here, so this report focused on opportunities involving a mixture of government and citizen initiative. Such opportunities include petition processes, city council meetings, parliamentary committees, open consultations, and environmental assessments.

Being familiar with the various opportunities available is the first step to becoming a more engaged citizen. However, it is important to note that the chance of successfully influencing policy decisions through such channels is difficult to predict and is probably very low in most cases. Governments are faced with countless inputs and priorities, and are of course charged with governing over a very large number of people, so the engagement efforts of individuals and small groups may have little influence. For example, petitions typically lead to a “tabled response” rather than an open debate or new direction, especially as the legislative branch of government (to which petitions are usually submitted) does not have authority over

day-to-day decisions. How to engage effectively and strategically, and thus overcome this difficulty, is a very complex question and is perhaps a topic worthy of full exploration in another report.

For the purposes of this report in the time being, there are a few general lessons that may be worth keeping in mind. First, solicited input (e.g. when the government invites citizens to participate in a consultation, comment on an environmental assessment, serve as witnesses for a committee) is more likely to have impact than unsolicited input (e.g. when citizens initiate petitions, submit briefs unprompted, or request to speak as delegations or witnesses), although both are crucial components of our democracy.

Second, localness and alignment are important. The input of a local citizen with a specific stake in a local issue will likely be given more weight than input from afar or from a more general perspective. As well, smaller, local governments are generally easier (or at least simpler) to engage with.

Third, if citizen engagement through these channels does not work, and there is still a serious environmental policy issue to address at hand, it is always possible to build broader coalitions and organize for impact outside of formal channels, through wholly citizen-initiated processes (e.g. protests and general activism).

KEY RESOURCES

- “About Committees” (Newfoundland and Labrador House of Assembly)
<https://www.assembly.nl.ca/Committees/>
- “About Petitions and How They Work” (House of Commons)
<https://petitions.ourcommons.ca/en/home/about>
- “Canadian Impact Assessment Registry” (Impact Assessment Agency of Canada)
<https://iaac-aeic.gc.ca/050/evaluations/index>
- “City Directory” (City of Corner Brook)
<https://www.cornerbrook.com/city-directory/>
- “Comment on Proposed Regulations in the Canada Gazette” (Government of Canada)
<http://gazette.gc.ca/consult/consult-eng.html>
- “Consulting with Canadians” (Government of Canada) [database of current, future, and past consultations]
<https://www.canada.ca/en/government/system/consultations/consulting-canadians.html>
- “Department of Environment, Climate Change and Municipalities” (Government of Newfoundland and Labrador)
<https://www.gov.nl.ca/eccm/>
- “EngageNL” (Government of Newfoundland and Labrador)
<https://www.engagenl.ca/>
- “Environmental Assessment List of Projects since March 2000” (Department of Environment, Climate Change and Municipalities)
<https://www.gov.nl.ca/eccm/env-assessment/projects-list/>
- “Environmental Assessment: A Guide to the Process” (Department of Environment, Climate Change and Municipalities; 2020)
<https://www.gov.nl.ca/eccm/files/env-assessment-a-guide-to-the-process.pdf>
- “Funding Programs” (Impact Assessment Agency of Canada)
<https://www.canada.ca/en/impact-assessment-agency/services/public-participation/participant-funding-application-environmental-assessment.html>
- “Guidance: Public Participation under the Impact Assessment Act” (Impact Assessment Agency of Canada; 2020)
<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-public-participation-impact.html>

- “How to Participate in the Work of a Committee” (House of Commons)
<https://www.ourcommons.ca/Committees/en/Participate>
- “Impact Assessment Agency of Canada” (Government of Canada)
<https://www.canada.ca/en/impact-assessment-agency.html>
- “Open Dialogue” (Government of Canada)
<https://open.canada.ca/en/open-dialogue>
- “Orders of Reference” (Standing Committee on Energy, the Environment, and Natural Resources; Senate of Canada)
<https://sencanada.ca/en/committees/enev/studiesandbills/42-1>
- “Participating in a Senate Committee Study: Giving Oral and/or Written Evidence” (Senate of Canada; 2019)
https://sencanada.ca/media/21260/witness_longv2-e.pdf
- “Petitions” (Newfoundland and Labrador House of Assembly) [includes guidelines and form for petitions]
<https://www.assembly.nl.ca/HouseBusiness/Petitions/>
- “Public Engagement Guide” (Newfoundland and Labrador Office of Public Engagement; 2013)
<https://www.gov.nl.ca/pep/files/Public-Engagement-Guide.pdf>
- “Recent News Releases” (Government of Newfoundland and Labrador) [look for items labelled “Environmental Assessment Bulletin”]
<https://www.gov.nl.ca/releases/r/>
- “US Government Counterterrorism: A Guide to Who Does What” (M. Kraft and E. Marks; 2016) [includes definitions of citizen engagement]
https://books.google.ca/books/about/U_S_GovernmentCounterterrorism.html?id=1anMBQAAQBAJ
- “What is the Difference between Citizen Engagement and Participation?” (CitizenLab; 2019)
<https://www.citizenlab.co/blog/civic-engagement/what-is-the-difference-between-citizen-engagement-and-participation/>
- “Work of the Past Session” (Standing Committee on Environment and Sustainable Development, House of Commons)
<https://www.ourcommons.ca/Committees/en/ENVI/Work>

APPENDIX – ADDITIONAL DEFINITIONS

Engagement Spectrum: The idea that there exists a variety of public engagement processes which governments can use, ranging from low levels of engagement and integration between citizens and government to high levels of the same. Relevant literature contains several versions of this spectrum, but one of the simplest (NL Office of Engagement 2013, p. 3) contains just four categories of processes, each with its own uses:

- informing (decision already made, no chance for citizen influence, goal is awareness);
- consulting (gather information, test and clarify ideas, goal is improved decision making);
- deliberating (generate ideas, genuinely consider alternatives, obtain citizen buy in); and
- co-creating (undertake shared actions, engagement more binding, issues more complex).

One aspect of these definitions that may be confusing is that “citizen engagement” and “consultation” may often be used interchangeably, even though the above definitions suggest that the latter is just one type of the former. Even more confusing, “citizen engagement” is sometimes used to refer only to the processes with higher levels of engagement (i.e. with informing and consulting not counting as citizen engagement). For our purposes, citizen engagement is an umbrella term, which may include consulting. This is not the only, or even necessarily the best, way to use these definitions, but beware that different

documents and pieces of literature will use the terms differently.

Stakeholder: An individual representing a group or organization that has a formal stake (e.g. a specific financial, legal, moral, cultural, or social interest) in the outcome of a particular policy decision, and who may hold technical knowledge about the issue (NL Office of Engagement 2013, p. 9).

Resident: An individual with a general interest in a particular issue affecting their community and a preference for a certain policy decision on that issue, but who does not have a formal stake in the outcome (NL Office of Engagement 2013, p. 9). Residents are less likely to be formally and directly involved in citizen engagement processes, and thus may have to draw more on citizen participation initiatives to become involved with policy processes.

Note that the distinction between “stakeholder” and “resident” can also be confusing. For example, “stakeholder” is often used as an umbrella term referring to anyone with any sort of interest at all in a certain issue, and thus could include residents. Furthermore, while the terms “resident” and “citizen” would probably have very similar definitions, the terms “citizen engagement” and “citizen participation” (especially the former) are definitely meant to include “stakeholders” as well. For the purposes of this report, the distinctions do not really matter; the opportunities detailed in the above sections could be pursued equally well by stakeholders, residents, or citizens.