



APR - 2 2020

Mr. John Dillon  
Senior Vice President, Policy and Corporate Counsel  
Business Council of Canada  
99 Bank Street, Suite 1001  
Ottawa ON K1P 6B9

Dear Mr. Dillon:

I am writing to you today with regard to your letter of March 20, 2020, addressed to the Honourable Jean-Yves Duclos, President of the Treasury Board, concerning federal, provincial and territorial regulatory compliance challenges presented by COVID-19.

The Government of Canada recognizes that Canadians and all businesses operating across Canada are facing extraordinary circumstances during the COVID-19 pandemic. Staff may be sick, or unable to work from home, travel restrictions across provincial borders may be disrupting operations, and labs may not be available to take samples or provide analysis. All of this has an enormous impact on businesses across the country.

Our top concern remains the health and safety of all Canadians. At Environment and Climate Change Canada, that includes our important mandate to protect the environment and human health. I share your concern for a concerted public- and private-sector approach that gives priority to protecting human health and preventing the spread of the virus by following the directions as set out by public health authorities.

During the global COVID-19 outbreak, the federal government is taking aggressive action to protect the economy, and the health, safety and jobs of all Canadians. As part of Government of Canada's COVID-19 Economic Response Plan, it will provide up to \$27 billion in direct support to Canadian workers and businesses, as well as \$55 billion to meet the liquidity needs of Canadian businesses and households through tax deferrals to help stabilize the economy.

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In addition, the Government of Canada will provide a 75-percent wage subsidy for qualifying businesses for up to three months, retroactive to March 15, 2020. This will help them to retain and return workers to the payroll.

Throughout this outbreak, Environment and Climate Change Canada will continue to work on many important initiatives that protect the environment and promote clean economic growth while recognizing that Canadian businesses are facing extraordinary circumstances at this time.

Environment and Climate Change Canada's long-standing policy is to respond to violations in a fair, predictable and consistent manner. While the Department's laws remain in effect and cannot be waived, I want to assure you that departmental officials will exercise enforcement discretion to take into account any challenges that regulated parties may face as a result of the current pandemic.

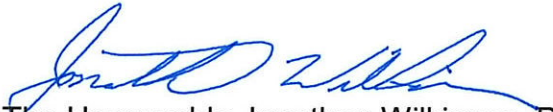
I expect regulated parties to act responsibly in order to minimize the effects and duration of any non-compliance caused by COVID-19. To the extent possible, regulated parties should document the nature and dates of non-compliance, how COVID-19 contributed to the non-compliance, and the actions taken to prevent or minimize any risk to human health and the environment. This includes steps taken to come into compliance at the earliest opportunity. As well, I would like to remind the Business Council of Canada's member companies of the ongoing importance of complying with all obligations to notify public authorities about unauthorized releases of pollutants, particularly where those incidents may cause a risk to human health or the environment.

Before taking enforcement action, Environment and Climate Change Canada will continue to consider, on a case-by-case basis, any damage to the environment, any other aggravating factors and all reasonable measures taken by an individual or company to mitigate and to comply.

The Government of Canada understands that some sectors have been disproportionately impacted by the COVID-19 pandemic. The Government will continue to carefully monitor all developments and take further action in the near term. The federal government will also continue to take action to ensure all Canadians and businesses get the support they need to weather this crisis and emerge stronger than ever before.

I trust that this information is helpful. Please accept my best regards.

Sincerely,



The Honourable Jonathan Wilkinson, P.C., M.P.

c.c.: The Honourable Jean-Yves Duclos, P.C., M.P.

Mr. Pierre Gratton, President and Chief Executive Officer, Mining Association of Canada

Mr. Derek Nighbor, President and Chief Executive Officer, Forest Products of Canada

Mr. Bob Masterson, President and Chief Executive Officer, Chemistry Association of Canada

Mr. Michael McSweeney, President and Chief Executive Officer, Cement Association of Canada

Mr. John Gorman, President and Chief Executive Officer, Canadian Nuclear Association

Mr. Francis Bradley, President and Chief Executive Officer, Canadian Electricity Association

Mr. Jean Simard, President and Chief Executive Officer, Aluminum Association of Canada

Mr. Scott Banda, Chief Executive Officer, Federated Co-operatives Limited

Mr. Garth Whyte, President and Chief Executive Officer, Fertilizer Canada

Mr. Timothy M. Egan, President and Chief Executive Officer, Canadian Gas Association

Ms. Cathy Campbell, President, Responsible Distribution Canada

Ms. Catherine Cobden, President, Canadian Steel Producers Association

Mr. Greg D'Avignon, President and Chief Executive Officer, Business Council of British Columbia

Mr. David C. Adams, President and Chief Executive Officer, Global Automakers of Canada

Mr. Dennis Darby, President and Chief Executive Officer, Canadian Manufacturers and Exporters

Mr. Peter Boag, President and Chief Executive Officer, Canadian Fuels Association

Mr. Mark A. Nantais, President, Canadian Vehicle Manufacturers' Association

Mr. Chris Bloomer, President and Chief Executive Officer, Canadian Energy Pipeline Association

Mr. Gary Leroux, President and Chief Executive Officer, Canadian Paint and Coatings Association

Mr. Tim McMillan, President and Chief Executive Officer, Canadian Association of Petroleum Producers