On April 17, 2025, Ontario’s provincial government published proposed amendments to the Endangered Species Act, 2007. These changes, as The Protect Ontario by Unleashing our Economy Act, 2025, includes the immediate elimination of management plans and recovery plans of species at risk (SAR), removal of progression tracking, transfer of SAR classification power from the Committee on the Status of Species at Risk in Ontario (COSSARO) to the discretion of the provincial government, elimination of the Species at Risk Program Advisory Committee, removal of harassment as a prohibited and punishable activity, change in the Act’s definition of “habitat”, and replacing government review processes with an online registry of activity to eliminate wait time (and oversight) of SAR permits (Ministry of the Environment, Conservation and Parks [MECP], 2025, April 17).

These proposed changes limit the oversight and reach of the Endangered Species Act (2007), and many ecosystems and ecological processes will be impacted. Many of Ontario’s SAR hotspots include wetlands, which I predict will feel the greatest impact from these changes as developers will be able to move ahead with projects before any government review can occur. While the amendment reads, “Activities that are harmful to species cannot proceed unless the person carrying out the activity has registered the activity, or in limited situations, obtained a permit”, the registration process mentioned is an online platform where developers list their intended activities and then immediately can move forward (MECP, 2025, April 17). I predict that all Ontario ecosystems will be hurt by the amendment, as all SAR will be affected.

Further, there is a proposed change to the Species at Risk Act for Ontario coming this year, if The Protect Ontario by Unleashing our Economy Act, 2025, is accepted: the Species Conservation Act (SCA), 2025. From what I can tell, the SCA (2025) proposes name changes to include changing the Species at Risk in Ontario (SARO) list to Protected Species in Ontario List, which would greatly limit the number of species listed as species of Special Concern and their habitats are not technically “protected” by the Act. By potentially removing Special Concern classification from the Act, in conjunction with the currently proposed change of halting any tracking of species progress, a number of species will be dropped from the list and stripped of any protections until they are re-listed as a more dire classification – but how can this re-listing be accomplished by COSSARO if progress is no longer documented? Moreover, the amendment proposes a change in definition of “habitat”. Specifically, “the definition of habitat is proposed to be reframed as follows:

* For animal species: a dwelling place, such as a den, nest, or similar place, occupied or habitually occupied by one or more members of a species for the purposes of breeding, rearing, staging, wintering, or hibernating; the area immediately surrounding a dwelling place described above that is essential for the purposes mentioned;
* For vascular plant species: the critical root zone surrounding a member of the species; and
* For all other species (for example, lichens): An area on which any member of the species directly depends to carry out its life processes.”

The reframing of Section 2.1.(b) of the Endangered Species Act, 2007, removes species’ diet and indirect relationships from the definition of habitat. The ESA (2007) currently defines habitat as “an area on which the species depends, directly or indirectly, to carry on its life processes, including life processes such as reproduction, rearing, hibernation, migration or feeding[.]” For example, American Beavers (*Castor canadensis*) are not a protected species, but they are a vital food source for the endangered Eastern Wolf (*Canis lupus lycaon)* in Central Ontario. If wetlands are developed today, this effect must be considered as it will impact an endangered species’ habitat and food source. However, under the proposed amendment, this will not be considered, and the wooded wetland isn’t critical to the survival or success of the Eastern Wolf, a keystone species. If passed, the amendment would affect many species at risk, ecosystems, and ecological processes negatively.

 Ecological processes impacted by the proposed amendment and resulting developments, includes many natural habitat cycles. The water cycle, nitrogen cycle, and carbon cycle are all affected by the removal of trees and other photosynthesizers that purify the air and sequester carbon, as well as the increase in air pollution from heavy machinery and the ever-evolving highway. Ecosystem variability and resilience would plummet at the same rate as biodiversity, as the system supports would be unable to bounce back to its original state or continue to perform regulatory services. Over time, as the land cover changes and interruptions to ecological processes accumulate, so will the land’s ability to regulate temperature and precipitation, limiting climate regulation and water regulation. This can lead to increased run-off, carrying road salts and heavy metal shedding from vehicles to enter the surface and/or groundwater, ultimately contributing to additional pollution, decreased water retention and ability to naturally purify the water as deep-rooted plants have been removed for development (Alcamo et al., 2003). In addition to the water regulating processes, the lack of greenery also impacts pollinators (limiting seed fertilization) and air quality (from increased vehicle presence) which both create their own feedback loops and eventually an uninhabitable space for native plants. Over more time, the ability for soil to form and nutrients to successfully cycle through will diminish further, not helped by the nutrient-starved fill that development projects use, and the introduction of road salts.

 While the provincial government argues that the proposed amendment is necessary to “unleash Ontario’s economy”, it comes with a long list of disastrous side-effects. While developments like Premier Ford’s highways and home-building plans create short-term jobs and economic benefits, the effects it has on ecological processes can lead to economic hardships such as flood, poor air and water quality, and food shortages due to a lack of stable climate and pollinator deaths. Also, these long-term effects would be nearly impossible to measure thanks to the proposed amendment.

There are two considerations regarding the knowledge gaps surrounding this issue. Firstly, if passed, Ontario has the potential to have the weakest species at risk protections in the country, and we do not have an example to measure our failure against – this hasn’t been done before. And, to develop on that thought, the elimination of "tracking progress" of species recovery and management, intentionally creates a knowledge gap, making it increasingly difficult (if not impossible) to assess ecosystem health at a provincial scale. So, while we may be failing, we won’t know by how much – it would take a lifetime to measure.

**References**

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