



To protect, restore, regenerate, and rewild Stittsville's Wetlands for future generations.

May 15, 2025

The Honourable Todd McCarthy
Minister of the Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Sent via Email: minister.mecp@ontario.ca

Dear Minister McCarthy,

Subject: Proposed Interim Changes to the Endangered Species Act, 2007 and a Proposal for the Species Conservation Act, 2025 (ERO 025-0380)

On behalf of the Friends of Stittsville Wetlands, we are writing to you regarding the alarming changes proposed in Bill 5, The Protect Ontario by Unleashing our Economy Act, 2025. If passed, this bill would repeal Ontario's Endangered Species Act, 2007, replacing it with a drastically weakened framework, referred to as the Species Conservation Act, for the protection of our province's vulnerable species.

Bill 5 and the elimination of the Endangered Species Act, and the replacement with the proposed Species Conservation Act, are compounding a [series of previous measures](#) that the Ontario government has taken in recent years to dismantle protections for wetlands and endangered species. These more recent proposals run roughshod over nature and are counter to the historic "Deal for Nature" ([The Kunming-Montreal Biodiversity Framework](#)) adopted during the [fifteenth meeting of the Conference of the Parties \(COP 15\)](#) in 2022.

Simply put, it removes essential protection from critical habitat on which species depend for their survival. We are in a [global biodiversity](#) crisis, with over 230 plants and animals at risk in Ontario. After years of neglect and [incremental cuts](#), endangered species in Ontario urgently need more protections, not less.

The Friends of Stittsville Wetlands are a volunteer, community-based, not-for-profit corporation with the mission to protect, restore, regenerate, and rewild the fragile and ecologically significant wetland, known as the Goulbourn Wetland Complex, in proximity to Stittsville. The wetland is

accessible via the TransCanada Trail – Canada's national trail and the world's longest network of multi-use recreational trails.

Through the development of collaborative partnerships with the private sector and non-governmental organizations, the Friends of Stittsville Wetlands are working to ensure the protection, restoration, regeneration, and rewilding of the Goulbourn Wetland Complex – for those species that call them home, for ourselves, and for future generations.

The Goulbourn Wetland Complex is home to a rich variety of species, both terrestrial and aquatic. The wetlands support a range of habitats, including marshes, swamps, and forested wetlands, which provide nesting grounds and critical habitat for these species, contributing to the biodiversity of our region.

Within the Goulbourn Wetland Complex, several species are deemed to be threatened, including [Eastern Meadowlark](#), [Bobolink](#), [Eastern Whip-poor-will](#), [Western Chorus Frog](#), and the [Blanding's Turtle](#). Other species noted as Endangered include the [Spotted Turtle](#), while others are identified as of Special Concern, including [Yellow Rail](#), [Barn Swallow](#), [Common Nighthawk](#), [Eastern Wood-pewee](#), [Wood Thrush](#), [Monarch Butterfly](#), [Snapping Turtle](#), and [Eastern Milksnake](#).

Since the provincial government's rollout of the weakened Ontario Wetland Evaluation System – the official system for identifying and designating PSWs – on January 1, 2023, 130 ha of wetlands within the Goulbourn Wetland Complex have lost their provincially significant wetland (PSW) designation and the strong provincial protection that designation imparts. Those species that were once protected through the PSW designation are now further threatened by Bill 5 and the elimination of the Endangered Species Act, and the replacement with the proposed Species Conservation Act.

Across our province, the proposed Species Conservation Act, 2025, would devastate wildlife protection and have potential implications for the rights of Indigenous Peoples, through several concerning changes, not limited to:

1. **Narrowing of Protected Habitats:** The new definition of a habitat reduces protected areas to only immediate surroundings, ignoring crucial feeding grounds and migration corridors that species depend on for survival– these loopholes expose endangered species to the threat of extinction without directly "killing" them.
2. **Political Control Over Species Protection:** The government will gain unprecedented power to decide which endangered species get added or removed from protection lists based on political and economic considerations. This discretionary listing of species removes an essential, independent, and science-based assessment process.
3. **Lack of Oversight:** Developers can begin harmful activities immediately after self-registration without ministry review or approval. Crucial environmental assessments will be eliminated before damage occurs, with inadequate penalties.

4. **Eliminating recovery strategies** makes it nearly impossible to assess, mitigate, and avoid harms to species.
5. **Offloading responsibility for migratory birds and aquatic species** to the federal government is an unprecedented abrogation of provincial responsibility and negates the essential collaboration between both levels of government.
6. **Indigenous Peoples' right to free, prior and informed consent (FPIC) is not mentioned anywhere in this proposal.** The proposal to terminate the environmental assessment process for the Eagle's Nest mine in the Ring of Fire creates the potential for developments without the consent of impacted Indigenous Peoples.
7. **The ongoing decline of endangered species is not being addressed.** The text and preamble of the Species Conservation Act (SCA) create an impression that it is purely performative and is not intended to prevent the ongoing decline of endangered species in practice.

A survey in 2023 from WWF-Canada, conducted by [Environics Research](#), shows that 77 per cent of Canadians believe we're at a crisis point and must act in the next 10 years to reverse biodiversity loss. The findings indicate a growing sense of urgency — this number is up 10 percentage points (from 67 per cent) since the last time this question was asked in August 2021.

Ontario's biodiversity faces unprecedented threats from habitat loss, climate change, and development pressures. Unleashing our economy should mean building strong local economies that are in harmony with nature, not sacrificing our environment at the expense of economic growth. Ontario should be a leader in species protection, not taking steps backward that prioritize short-term economic interests. Our prosperity requires that we work to protect nature for species, for ourselves, and future generations.

We urge you to rescind these proposed changes and stand up for Ontario's wildlife heritage.

Sincerely,

Janet Stavinga
Co-Founder and President
Friends of Stittsville Wetlands
www.FriendsofStittsvilleWetlands.com