**Comments on the Proposed Interim Changes to the Endangered Species Act, 2007 and a Proposal for the Species Conservation Act, 2025**

I am sending this document as my comments to the Proposed Interim Changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025. To give context, I am an environmental consultant with over 16 years of experience in the field of environmental assessments (over 20 years of experience total) across Canada for a variety of stakeholders (private, provincial and federal). This has, of course, included extensive exposure to the ESA and its regulations. I have been involved in a variety of SAR-related projects, which have included targeted surveys for SAR, use of regulatory exemptions and the preparation of numerous mitigation plans, preparation of guidance documents for MECP and acquisition and monitoring of Overall Benefit Permits and Agreements under the legislation.

Overall, I do not disagree with updating the current Endangered Species Act and agree that the process to obtain an overall benefit permit, for example, is lengthy, and there is a lack of flexibility in the current system, which suppresses innovation within the development industry as it relates to the environment and SAR. However, I do feel the Endangered Species Act, though targeting specific species, is the only mechanism to drive protection of habitats for a broader range of species and thus provides some level of protection to habitat functions that otherwise are not accounted for in the provincial EA process (i.e., not considered legislatively required).

**ultimately shift nearly all species-related authorizations to a registration-first approach – a process already successfully used for many species and other environmental authorizations**

I think the first piece, which is somewhat tangential to this, is the removal of the ability to establish an advisory committee. Ultimately, I’m not 100% sure of the success of the existing advisory committee; however, I do not see any means of successfully implementing SAR protection (or any environmental protection for that matter) in the Province without some input from the technical community. I would go further to say Ontario has a large base of practitioners who are in the field experiencing many of the issues facing the ESA and its implementation and I feel this resources is poorly tapped into when determining next steps, regulation changes or policies which likely also leads to some parts of the development sector feeling the ESA and its regulations are a heavy handed overreach of government action. Of course this is not true as many of the provisions are based on sound scientific information and public (including aboriginal) knowledge however moving forward finding means in todays technological era to get feedback from monitoring for example back into regulatory decision making (something which has been lacking since the ESA was first put into force) is important. There is no growth in Ontario without learning from past activities, the development sector would never operate this way so why should the regulatory branch do so?

* *Under the proposed new SCA, 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.*

Fundamentally, at a high level, I do believe that in the vast majority of circumstances, a proponent-driven expert-guided (as per the existing regulatory exemptions) and a wider range of registration options is a very valid aspect of the proposed changes. However, as stated above, how these regulations are created, updated and enforced is key to a successful balance between species protection/stewardship and future development and prosperity of Ontario. In the literally hundreds of registrations I have been involved with, I have only had one (1) audited by MECP, and that was due to public concern over the proposed quarry. There simply to date has simply been very little oversight of the registration process, with no follow-up to see how it's working. How available exemptions are worded is also key, and how the intent is implemented is also key. For example,, the Ministry of Transportation interprets “infrastructure” as all property they own, as it is part of the provincial transportation infrastructure. Ore. 242/08 Section 23.18 does not define infrastructure however:

*3. Work to maintain, repair, remove or replace an existing structure or any infrastructure described in subsection (2), including the decommissioning of a mine, or to upgrade an existing structure or any infrastructure described in subsection (2) to meet a safety standard, if,*

*I. the maintenance, repair, removal, replacement, decommissioning or upgrade does not require,*

*A. a temporary or permanent change to the location of the structure or infrastructure, or*

*B. a temporary or permanent extension of the area the structure or infrastructure occupies, except in the case of the replacement of an existing culvert with a new culvert that is larger than the one it replaces, or*

*ii. In the case of work to maintain, repair, replace or upgrade a structure or infrastructure, the work does not alter the way in which the structure or infrastructure is used or operated.*

*2) Paragraph 3 of subsection (1) applies to infrastructure that is part of or related to,*

*(a) a communications system;*

*(b) an electric power system, oil or gas pipeline, alternative energy system or renewable energy system;*

*(c) a road or railway system;*

*(d) water works, wastewater works, stormwater works and associated facilities; or*

*(e) drainage works designed to control surface water runoff, other than a drainage work to which section 23.9 applies. O. Reg. 176/13, s. 14.*

Under this exemption:

*6) A mitigation plan shall be prepared by one or more persons with expertise in relation to every species that is the subject of the plan, using the best available information on steps that may help minimize or avoid adverse effects on the species, which includes consideration of information obtained from the Ministry, aboriginal traditional knowledge and community knowledge if it is reasonably available. O. Reg. 176/13, s. 14.*

I have personally been told by the Ministry of Transportation that because they interpret infrastructure under the applicable Highway Act as all property owned by MTO that this exemption can be used for all works the ministry may do except new land acquisition. I have also been told by the Northern districts that a mitigation plan is not required for their work when it clearly is. My point here is that because the regulation is somewhat ambiguous in its wording, there is a lot of confusion among proponents as to how to apply the exemption. And in some cases, simply nothing happens (i.e., no mitigation plan, no mitigation). I don’t feel based on my understanding of intent that this is the intent of this exemption per say yet that is how it has been functionally used by MTO for several years now. While preparing best management documents with MECP staff from MECP were shocked at the use of this exemption in this way and found it hard to believe anyone would interpret it that way.

My point here is that yes, exemptions and regulations can be a very strong tool to both streamline the process of making projects happen AND ensure species and their habitats are impacted as minimally as possible, BUT only if those proponents utilizing them come at the situation from a balance of stewardship and development needs. When either stewardship/protection or development needs are not balanced, the system just does not function, and ultimately, while a specific project may be fast-tracked, we as the citizens of Ontario ultimately pay the long-term price.

My suggestions around regulatory exemptions and registration of activities would therefore include the following considerations:

* Review all existing regulatory exemptions to see if they meet the intent of protecting species and their habitat (i.e., intent of the act) while balancing the development needs of Ontarians.
* Review regulations on a regular basis (this may be the best area to focus on legislative revision schedules, far more important than delivering recovery strategies if none of the strategies make it to legislation). But also do so with input from industry and practitioners actively involved in the field, as well as community knowledge and aboriginal knowledge.
* Look at expanding the habitat regulations for species to include information outlined in general habitat descriptions. While policy does allow for more flexibility, regulations are generally clearer in how they apply and what is legally required.
* Consider including a stewardship clause into all regulatory exemptions. If the province is seriously considering stewardship as an approach to mitigating impacts to species and their habitat, regulate it. Without a clear, concise regulation stipulating stewardship is mandatory for all registrations (many do include activities which would fit this category, such as re-planting butternuts for trees removed etc. the overall intent is to provide benefit to the species.
* Clearly define which species will not be eligible for each regulation. I won’t list my thoughts on this, but some activities would be very detrimental to some groups of species (particularly many of the small vascular plants, insects and terrestrial mollusks, lichens and mosses).
* Ensure regulations are in line with any existing recovery strategies or community/aboriginal knowledge. For example, if turtle mortality is a known threat across Ontario and multiple species, and the general public is generally in agreement that road mortality is negative, structure regulations to actually have an impact on this.
* Consider affording protections to Special concern species. The general public and First Nation communities find this extremely frustrating and confusing because the intent of listing them is to avoid further declines. It may be possible to have a higher level of overall scale of protection for SC, THR and END species across the province. Ultimately, for example, Snapping Turtles and Blanding’s Turtles share most of the same range and face many of the same threats; it seems illogical to split the species given the overlap.
* Ensure there are clear expectations for monitoring and feedback into the provincial regulation system. Projects need to be documented to see where there were successes and where there were failures, if the registration system is to improve. That is what we lack now, projects are registered and then forgotten and there is little knowledge as to how effective they were.
* At the same time, regulations need to allow for proponent-driven and innovative solutions to problems. It has to be understood that if a project is registered, it might fail to meet its goal of either protecting a species or minimizing impacts to habitat and stewardship, though positive outcomes do not always work the way we intend (neither does overall benefit).
* Consider qualifying who must be consulted. Previous certifications, such as the BHA certification, did provide quality assurance. While ultimately it is the proponent's decision, it's very clear across multiple existing exemptions that an “expert” must be consulted. Lack of an even playing field in this regard (biologists/ecologists are not certified in Ontario as in BC and Alberta), proponents are incentivized to find an “expert” that will give them the answer they want, not necessarily the answer they need. I’ve seen it far too often in my lifetime, unfortunately, but quantifying who can be considered an expert (or making some sort of expert registry as we have for wetland evaluations) would be a positive step forward.

Allowing for honesty to document failure is important;, the whole point of the regulatory exemption is to be exempt from the legislation and do everything in your power to avoid the prohibitions of the ESA. There will always be people who either think environmental protection is a waste of time/not needed or the opposite, we should protect everything at the expense of development. Neither stance is the right thing to do, and over the years has created a very divisive work environment in Ontario. Ultimately, let's stop being divisive on the subject. We all know development of all kinds is needed, but let's do it responsibly. Ontario can still be open for business without sacrificing our natural resources in the process, including SAR as every part of our environment (and the environment is everywhere around us wherever we live or work) won’t benefit us in the long run.

If the general public sees the regulatory exemptions as a positive rather than another way for the government and corporations to “get out of having to do anything” it will go a long way to acceptance across the province of the kind of projects which need to happen for national unity as well as the prosperity of Ontario. I think I’ve outlined a few case studies where I can say with certainty the Province did not act responsibly as it relates to the Endangered Species Act, and it's this kind of action that builds distrust in the population of Ontario. If we truly want to move forward in unity and get big projects done, we have to take a stewardship approach that is regulated yet flexible enough to allow proponents to come up with innovative solutions to the problem of biodiversity and habitat loss across the province. Without that flexibility, everyone suffers, the species and future generations.

**establish a framework for setting clear expectations and rules for proponents to follow, ones that are focused on those activities that are most likely to have a direct negative impact on species**

At a high level, this does sound like an excellent approach; however, implementation of this based on previous implementations under MNRF and MECP has both proven slow and cumbersome with a large degree of uncertainty. Part of this process involves redefining protections for species. In the proposal, the redefined protections are somewhat broad. The following outlines the proposed refined protections and my subsequent comments on each without getting to technical:

* *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*

This is likely not sufficient to adequately protect the habitat needs of species. While the definition of protecting a “nest” may fall in line with federal policy and legislation, the removal of species also federally listed (i.e., Migratory Birds) limits the utility of this. For the remaining groups of species, such as mammals, turtles and snakes, these species rely on much broader areas to ensure the stability of populations. For Example the Blanding’s Turtle general habitat description does at present adequately protect the most vital portion of the species habitat needs (i.e. wetlands, waterbodies and watercourses and a 30 m terrestrial buffer from these features within 2 km of an element occurrence) as this species is dependent on these features for a variety of vital life processes many of which are nearly impossible to confirm without complex radio telemetry studies (i.e. finding overwintering sites). While nests are important, this definition would essentially remove all habitat protection for the species. The definitions given above do not adequately cover the species' biological needs. In addition, in cases where detailed science-based general habitat descriptions or habitat regulations exist, it seems a poor choice to dismiss the evidence-based protections in favor of a broader approach. At the same time and keeping with the Blanding’s Turtle, the Category 3 habitat protection is cumbersome at times as it functionally does little to preserve habitat but rather is used as a means to determine the likelihood of increased road mortality (loss of individuals) than as a habitat matric and current MECP policy through the habitat description clearly states this given the sensitivity of this habitat to changes. My recommendation would be to spend effort on reviewing existing habitat regulations and general habitat descriptions to see if they are sufficient, clear or if they need to be revamped individually based on a science and community (including aboriginal traditional knowledge as well as input from front-line environmental consultants and other stakeholders). Where habitat regulations or general habitat descriptions do not exist it would be reasonable to look at each remaining mammal, bird not federally protected, turtle, lizard, snake and amphibian individually to develop some framework for better defining how the provisions of habitat protection apply to the individual species rather than a one size fits all approach. Essentially, I’m not convinced that, given existing knowledge, this type of redefinition would be sufficient for mammals, birds not federally protected, turtles, lizards, snakes and amphibians listed as Threatened and Endangered in Ontario given their often complex interaction with habitat functions over space and time.

* *for vascular plant species: the critical root zone surrounding a member of the species*

Plants offer unique challenges compared with mobile animals, and for species such as trees (i.e., existing approach to Butternut, Black Ash, Kentucky Coffee Tree etc.), this is a very reasonable approach. However, the vast majority of vascular plants at risk in Ontario are small species typically dependent on microclimates (soil, moisture, sunlight etc.) factors to ensure the stability of populations. For example, protecting the critical root zone of American Ginseng will not protect the species if the overstory and surrounding vegetation are not also protected, as the function needed by this small species will no longer remain, as the critical root zone would be very small around individuals of the species. While larger wider wider-ranging species (i.e., Butternut and Black Ash) would benefit from clarity (though both also have significant clarity surrounding them at this time, based on the regulations and policy around them) it has been my experience working with MNR and MECP that the vast majority of vascular plants are extremely range restricted and should likely remain on a case by case basis due to their distributional rarity across the landscape of Ontario.

* *for all other species (for example, lichens): an area on which any member of the species directly depends to carry out its life processes*

This is likely sufficient given the proposed definition; however, this definition essentially is identical to the habitat protections given to all Threatened and Endangered species in Ontario at this time. As mentioned, the remaining species (primarily terrestrial mollusks, insects, lichens and mosses). Based on the above discussion (which could be fleshed out in more technical detail) this definition remains the most applicable to all species and it would likely be best to continue to develop specific regulations or policies (i.e. general habitat descriptions) to better clarify the protection for individual species (or in rare circumstances clads of species which share similar associations in habitat).

In terms of removing the concept of “harass,” this is technically of limited utility to major groups of species protected under the existing ESA, and primarily is associated with mammals and birds. Given that the provincial Fish and Wildlife Conservation Act and regulations also include provisions that prohibit the harassment of wildlife, there is sufficient case law to rationalize what constitutes harassment in Ontario. As such, I would suggest that, rather than removing the clause all altogether, for legal clarity, the term should be defined to include only groups of species which are known to be harassed by human activity, primarily mammals and birds, not protected federally. Failure to keep the term harass as a prohibited action would leave some species (i.e., American White Pelican, American Badger, Caribou, to name a few) at risk legally to activities that would significantly impact their ability to carry out necessary life processes.

* *Reduced duplication with federal legislation*

Again, at a high level, this seems like a logical next step in the progress of Endangered and Threatened Species protection in Ontario. Federally protected species under the *Fisheries Act* and the *Migratory Bird Conventions Act* (MBCA) and their associated regulations receive protection wherever they occur in Canada, and this extends to protection under the federal *Species at Risk Act* (SARA). I completely agree that removing redundancy in legislative overlap is important to minimizing hurdles to development in Ontario and Canada. While I will criticize the Federal Government in recent years for being slow to educate, enact and enforce provisions available to them in Canada for Migratory Birds (DFO has done a much better job protecting aquatic species under their jurisdiction), I would also point out that if this Provincial Government is committed to working with the Federal Government to make Ontario and Canada great then I would hope that the Province would do its part to ensure the general public (proponents) and the consulting industry (private industry) is aware of their responsibilities under these federal pieces of legislation. It has been my experience that both private and provincial entities (including the Ontario Ministry of Transportation) have at times ignored this legislation (particularly as it relates to Migratory Birds protected under SARA), at times directing consultants to incorporate items into provincial contracts that would otherwise contravene these acts. The economy of Ontario and Canada benefits greatly from the functions provided by a variety of bird species, and our agricultural and forestry sectors in particular would suffer greatly should we continue to loose more species across our province. Given that migratory have been protected in Canada since 1917, while not the responsibility of the province to dictate protection measures or legislation to protect migratory birds (including SAR) the Government of Ontario, and all citizens and businesses operating in the Province should be aware of their responsibility as Canadians to uphold this Federal legislation for the benefit of future generations in Ontario and Canada. Provided the Province is committed to doing its part as part of this Federal legislation, I would agree with removing protection requirements for species that receive federal protection. This must, however, be clearly outlined in all provincial processes, the responsibility of proponents and provincial regulators to follow all applicable laws, regulations and policies that apply to these federally protected species anywhere they occur in Canada. Alternatively, as the Province has proposed a “one window, one review” environmental assessment and review process lead by the Province then I would counter my previous statement and urge the Provincial Government to sit down with the Federal Government and broker an agreement which would allow the Province to use a science based approach to ensure protection for both Migratory Bird and Migratory Birds protected under SARA specific to Ontario as Ontario has a large stake in the prosperity of Canada in relation to Migratory Birds.

* *The proposed amendments to the ESA would remove the requirements to develop recovery strategies and management plans, government response statements, and reviews of progress from legislation. The ministry would then have the flexibility to focus the development of conservation guidance when and where it is needed and makes sense to do so.*

Again, fundamentally removing this legislative requirement in terms of timeframe does seem a positive from the perspective of resources, as some species are fundamentally “higher” priority than others. I will provide more comments in the Species Conservation Program section below but I do feel based on my experience with the PPS and its implementation (and lack of legislative or regulatory drivers as it relates to factors such as provincially significant wetlands, significant woodlands, significant valleylands, significant wildlife habitat etc.) that simply providing conservation guidance is not sufficient to ensure negative impacts of proposed project works are avoided. In essence what tends to happen particularly when municipal or provincial agencies are considering these factors (both provincial and municipal agencies typically require private proponents to consider these factors) that as there is no legislative driver there is no “legal” requirement to consider mitigation measures or offsetting or even impacts to these factors and I would surmise there would be no difference with this type of conservation guidance.

**Establish a new Species Conservation Program to support voluntary initiatives like habitat restoration that protect and conserve species**

Again at a high level the principle of this program is appealing. I will admit, however, that I have been trying to get proponents (private, municipal and provincial) to undertake voluntary stewardship activities and more often than not am told that “if there is no legislative or regulatory driver then no they don’t have to do it”. The proposal at present is:

*Ontario remains committed to species conservation and to promoting activities like habitat restoration, research, and community-based initiatives. This proposal would establish a new Species Conservation Program, which would improve upon and replace the Species at Risk Stewardship Program. Under the new program, the government intends to increase investment in supporting voluntary activities that will assist in the protection and conservation of species by more than four times, up to $20 million per year. The program would also consider a wider breadth of supportable conservation activities.*

*Any species that is classified by COSSARO will be eligible for ministry funding through the Species Conservation Program.*

The existing conservation agency, proposed as a solution previously, has failed to produce practical results. In my experience, it has been more cost-effective for proponents to undertake offsetting/overall benefit activities themselves vs using the existing conservation fund due to the discrepancies with calculating the funds required to be paid. I’m not entirely sure that a new agency is required to ensure stewardship takes place in Ontario. For my own experience working in the Transportation Industry, for example, other jurisdictions (Manitoba, New York State etc.) are significantly ahead of Ontario in terms of taking a stewardship approach to highway development, maintenance and renewal projects. This is not said lightly as I have been involved in both the creation of a vegetation management document for MNRF related to SAR and a national set of guidance documents for the Transportation Association of Canada (TAC) related to migratory birds (including SAR) and have reviewed numerous case studies in the preparation of these documents which show simple stewardship approaches such as using native plant species for reseeding roadside areas, installing exclusion fencing (permanent) for amphibians and reptiles and even considering alternative design options to avoid negatively impacting the functions provided by both the highway ROW and specific infrastructure (bridges and culverts).

In my time working with the Ministry of Transportation, the West Region has been the most proactive in taking a stewardship approach and could likely be used as a model for all development in Ontario. For example, a simple change in seed mixes using entirely native species pioneered by that region has been more widely accepted in the Provincial OPSS’s. The simple shift in the use of these seed mixes is significant to a wide range of species. Yet “stewardship” applies to both private developments and provincial developments (municipalities at times can be more accepting, BUT it varies widely based on their will and knowledge as well as voter base), unless it is a regulatory requirement. For example,, Butterfly Milkweed, a host species to the Monarch, grows naturally along the Highway 401 corridor between Trenton and Cobourg. This species is tolerant of the roadside condition and if it was more wildly planted (where soil conditions allow) the simple use of one plant species in roadside seed mixes could be a huge step forward in the stewardship of Monarch populations (admittedly Special Concern provincially) in the province. I don’t see how in situations like this a stewardship agency with voluntary advice would benefit projects, the species or the Ontario public. My experience is the more agencies involved the more time projects take. In the case of roadside vegetation, though seed mixes now might be more costly than standard agricultural species historically specified in OPSS’s and by designers, ultimately they will likely be cheaper in the long term in the form of reduced maintenance, increased biomass production and decreased administration cost dealing with multiple agencies. The simplest solution would be to simply legislate/regulate the use of this kind of stewardship approach.

I have been told that the Ministry of Transportation is reluctant to install permanent turtle exclusion fencing to keep turtles off of the highway (and reduce mortality of adults which are the most important part of the population age class) as there is no mandate within MTO to maintain the fencing once it is installed. Again, as there is no legislative/regulatory driver, there is no desire on the behalf of project managers and designers to implement stewardship measures into the vast majority of projects in Ontario. The more cost-effective measure would simply be to regulate or outline through policy that all provincial transportation projects must consider the use of turtle exclusion fencing as part of their designs. That puts everyone on the same playing field, no confusion, and ultimately, in many areas of the province, provides some of the highest degree of benefit to the turtles, given virtually all species recovery strategies (provincially and federally) cite road mortality as a significant threat to the survival of turtle species. Ultimately,, this illustrates my point well here the dilemma with a voluntary approach as ultimately it is the Province of Ontario that has agreed through the approved published recovery strategies, that road mortality in Ontario is a significant threat to turtle populations, yet it is also the Province of Ontario that has failed to implement any meaningful mitigation to that threat. As the Province has proposed a “one window, one review” for environmental assessment and approvals, it seems unfathomable that one branch of the Provincial Government has identified this significant impact, yet another fails to act on it as it's not part of their mandate to maintain highways in Ontario. If the province won’t voluntarily undertake stewardship approaches, then why would the general public or private sector? And ultimately, where does that leave species protection in Ontario under the proposed changes?

**strengthen our ability to enforce species protection laws to ensure that all proponents comply with the rules and expectations of this new approach**

Ultimately, this is a positive though weakening the legislation as discussed above may also weaken the effectiveness of the province to enforce the provisions of the SCA. Personally I have been involved in several projects where proponents have hired my company to complete a project and provide advice. We have identified SAR under the existing ESA, and the proponent has subsequently contravened the habitat provisions (i.e., removed the habitat without any exemption or permit). In one instance, when MNRF was administering the legislation, we had documented habitat for Eastern Whip-poor-will (SAR at the time). This information was presented to the Province for review of an aggregate pit license in the Ottawa area. The proponent had sat down in negotiations with the province but ultimately removed the habitat (treed area) entirely. They then submitted a revised report to the Ministry for their application two years later, documenting that the species were no longer present (as the habitat was no longer present). MNRF did question myself, as well as my colleagues, but subsequently did not press charges under the act despite clearly having maps in hand documenting the change in forest cover (subsequently planted to corn). Similarly, the Ministry of Transportation built an interchange through Eastern Meadowlark habitat in the City of Kingston. While completing regular monitoring as part of the Contract Administration, it was noted that the previous consultant had not clearly indicated that the species held a territory in the site (despite having observations on multiple dates), and the Ministry was informed of this discrepancy. When the birds arrived back on the breeding ground, they arrived to find a new highway on ramp built partially through their nesting area, and the birds remained on site, and it was only the harass provisions that caused the ministry to accept halting the construction (the Contractor was not at fault). We were reprimanded by the Ministry as a company for “delaying” construction, yet this project, which had no regulatory exemption, permit, or agreement, clearly contravened the provisions of habitat protection for the species at the time. My point to these examples is that under the current ESA and its regulations, there is no “duty to report,” and even when very defined frameworks for defining habitat protection existed in the legal context, they are not always followed and not always prosecuted. These actions took place primarily due to a lack of enforcement at the time. While increased enforcement is positive, enforcement must rely on a well-structured legal and regulatory framework to succeed, and at this time, sufficient details are not available to adequately analyze the effectiveness of the proposed changes (outside of where otherwise discussed above).

**Summary**

In summary, I do support changes to the ESA in Ontario; however, I’m not 100% convinced the proposed changes will be sufficient to balance environmental protection with development needs. We are in a very unique time where power shifts are taking place all around us. Ultimately, I think we can all agree that development is needed. While I am a biologist and often called a “tree hugger” or similar, I see the need for development and have always in my career. However, development of all scales needs to be done responsibly. There are solutions that can find a balance between both development and protection, but it takes a strong stewardship approach to mitigating impacts, restoring altered landscapes and ultimately finding a middle ground between living with species and habitats, and Ontario has the manpower, expertise to do just that. I think I’ve made a reasonably strong case for the facets I feel most need to be revised as part of the proposal, and I hope that the province decides to step up and do the right thing. We can be open for business and still do it in a responsible manner.