



Friday, May 16th, 2025

RE: ERO 025 – 0380

Dear Government of Ontario,

The Nottawasaga Steelheaders are a dedicated group of conservation minded anglers established in 1996 to help preserve the Nottawasaga River watershed, its fisheries and species for future generations. Over the past 30 years we have worked closely with the Nottawasaga River Conservation Authority, Ministry of Natural Resources, Nottawasaga Futures and many watershed communities, to rehabilitate and preserve the integrity of Nottawasaga River watershed and its interdependent species biodiversity. Many of these species' preservation are in already in a precarious state due to factors such land use change, development and climate change. Over this time, we have undertaken hundreds of thousands of man hours and dollars of corrective and preservation measures to curb this decline. We have also undertaken numerous fisheries studies and fish lifts.

Studies by the Nottawasaga Valley Conservation Authority have shown a decline in stream health due to land use change, intensification and increased development, already place many species in jeopardy. We have already seen the disappearance of a rare strain of Nottawasaga River wetland spawning walleye, which used the Minesing Wetlands to spawn. A 2014 report by the Nottawasaga Valley Conservation Authority, "60 Years of Forest Change in the Minesing Wetlands (1953-2013): Causal Factors, Ecological Implications and Recommendations for Reforestation, already is signalling impacts to species. Walleye, an important recreational sport fishery species is just one as are the endangered Lake Sturgeon.

We are very concerned with the proposal for change...

Proposal summary

The current approach to the protection and conservation of species at risk is complicated, takes too long to complete, and causes unnecessary delays and costs for housing, transit, and critical infrastructure. This proposal introduces a new approach.

The Protect Ontario by Unleashing our Economy Act, 2025 is proposing to make immediate amendments to the ESA and would later repeal the ESA and enact the new Species Conservation Act, 2025 (SCA), once proclaimed.

Collectively, the proposed changes would provide a reasonable, balanced approach to protecting species in Ontario and would:

- ultimately shift nearly all species-related authorizations to a registration-first approach – a process already successfully used for many species and other environmental authorizations
- 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
- establish a new Species Conservation Program to support voluntary initiatives like habitat restoration that protect and conserve species
- strengthen our ability to enforce species protection laws to ensure that all proponents comply with the rules and expectations of this new approach

Under the proposed new approach, instead of waiting for the ministry to approve permits, most proponents will be able to begin an activity immediately after registering. Registered activities will be required to meet all associated requirements set out in new regulations. The ministry looks forward to developing these regulations in consultation with the public and Indigenous communities over the coming months.

We feel, under the proposed elimination of the ESA and associated new changes in the replacement Species Conservation Act, there appears to be an underlying rush and action to prioritize development and economic issues over the protection of endangered species. We understand the critical significance of our economy especially in light of changing geopolitical forces and uncertainty. However changes should not come at the expense of our environment especially when it is already being impacted by our neglect and abuse. It is far too fragile at this point in our time to apply diminished care and responsibility with an act which could very easily cause irreversible damage.

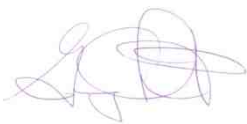
Please review and take into consideration the concerns and suggestions of other groups such as the Ontario Federation of Anglers and Hunters, Ducks Unlimited, other NGO's and First Nations to truly improve efficiency while maintaining the responsibility entrusted to you to take care of our environment, a healthy ecology and its species, many of which by the way ARE at risk.

We hold the Ontario Government responsible for the actions it takes and hope it does so with the proposed fully evaluated changes, wisely and with forethought for future generations.

How will you be remembered?

“We do not inherit the earth from our ancestors.
We borrow it from our children”

Yours in conservation,



Gary Christie
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