

Public Works

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peelregion.ca

May 15, 2025

Public Input Coordinator – Species at Risk Protection
Species at Risk Branch
40 St. Clair Avenue West
Toronto, ON
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Dear Sir/Madam:

RE: ERO #025-0380 Proposed Interim Changes to the *Endangered Species Act, 2007* and a Proposal for the Species Conservation Act, 2025

Thank you for the opportunity to review and comment on the above referenced posting on the *Endangered Species Act, 2007* and a proposal for the Species Conservation Act, 2025.

Peel Region Staff Comments

Generally, the Region is supportive of initiatives proposed by the province as it relates to facilitating faster approval of various applications, especially those associated with meeting the province's housing targets. There should, however, be a balance between efforts to speed up approvals and protecting the natural heritage and water resources of the province. As such, we support:

- The recognition the province is making between ecosystem resilience and Species at Risk (SAR) protection.
- The collaborative efforts with agencies and external partners for targeted and timely on-the-ground activities which could contribute to SAR recovery and habitat protection.
- The reaffirmation of a commitment to invest in SAR conservation through the new Species Conservation Program which will have increased funding to support SAR protection and conservation activities. As proposed, the new program would support a wider breadth of conservation activities, including SAR habitat preservation, rehabilitation and enhancement, public education and outreach programs, and other activities to assist in the protection and conservation of species.

With respect to the subject proposal, Peel Region offer the following comments for consideration prior to finalizing the legislation:

1. Though not against a registration-first approach, it comes with a higher risk and possibly a high cost to species at risk with the loss of the species or habitat especially on species at risk populations that may be vulnerable or fragile. The preference is for an iterative approach which does require additional time and continues to recognize the species at risk. Well-carried out iterative approaches allow for early issue identification, faster and continuous feedback and refinement, responds to more stakeholders' concerns, fosters collaboration and flexibility, making it an effective cost-effective tool for tackling complex problems while allowing for adaptation. By

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prioritizing communication, collaboration and early feedback; using cross-functional teams; and, open, transparent and accountable processes will reduce long delays.

2. It should be carefully considered if removing the requirement of government response statements, management plans and recovery strategies may result in reducing the efficiency or effectiveness of conservation and protection efforts.
3. Please consider implementing a time frame that balances the development objectives while still offering sufficient time for input from those with research and scientific knowledge and in-field experience.
4. Peel staff look forward to learning more about the new \$20 million investment in a Species Conservation Program and if it is specifically for any SARs, what the duration of the program is proposed to be and if conservation and protection activities are mandatory.
5. Early details on the proposed interim changes and new Species Conservation Act, 2025 or an opportunity to provide input on draft regulations would be appreciated.
6. Consideration should be given to a conservation first approach, as enforcement may be detrimental or too late for the species at risk or their habitat and may lead to unnecessary delays.
7. There are a few areas where the legislation would benefit from definitions. For example, inclusion of a definition of a species' habitat will provide clarity on how to protect the habitat which is essential for species survival. Similarly, continuing to define other terms, such as harassment is important to protect species as they are breeding, caring for young, feeding, nesting/sheltering or resting.
8. When allowing for the appropriateness of having processes at both the federal and provincial level, consider that each level of government has differences in scale of species population, the multi-national migration of many species and also global agreements for species protection.

It is hoped that further engagement, collaboration and consultation will identify solutions to save administration and review time, while still conserving and protecting SAR.

Thank you for your time and consideration of Peel Region's submission. Should you have any questions or clarifications, please do not hesitate to contact Learie Miller at learie.miller@peelregion.ca.

Best regards



Tara Buonpensiero, RPP, MCIP
Chief Planner and Director of Planning and Development Services