



Public Input Coordinator – Species at Risk Protection  
Species at Risk Branch  
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**RE: ERO Number 025-0380 – Proposed Changes to the Endangered Species Act, 2007 and the Proposed Species Conservation Act, 2025**

The Township of Puslinch Council (Council) at its meeting held on May 7, 2025, directed Township staff to submit comments with respect to ERO 025-0380 Proposed Changes to the Endangered Species Act, 2007 and the Proposed Species Conservation Act, 2025. Council has significant concerns with respect to the proposed changes to the Endangered Species Act, 2007, and the proposed Species Conservation Act, 2025, as posted under ERO number 025-0380 and respectfully submits the following concerns and objections to the proposed legislative amendments for the following reasons:

**Erosion of Protections for Species at Risk**

The proposed changes would significantly weaken the protections currently in place for endangered and threatened species in Ontario. As stewards of our environment, we have a collective responsibility to ensure that vulnerable species are not only protected in name but also through effective, enforceable legislation.

**Unilateral Authority to Modify SARO List**

The proposal to provide the government with the unilateral authority to arbitrarily add or remove species from the Species at Risk in Ontario (SARO) list is concerning. Such authority, if exercised without transparent, science-based criteria and broad consultation, undermines public trust and risks politicizing what should be an evidence-based process.

**Redefinition of “Habitat”**

The suggested redefinition of habitat to include only breeding, rearing, staging, wintering or hibernating areas, while excluding critical migratory and feeding grounds, fails to reflect the ecological realities of many species. Such a narrow definition disregards the full life cycle needs of species at risk and would severely compromise the effectiveness of conservation efforts.



### **Removal of "Harass" from Prohibited Activities**

The removal of the term "harass" from the list of prohibited activities in the Act could allow for greater disturbance to species at risk, including through indirect means that may not cause immediate harm but can have long-term consequences for their survival and well-being.

### **Permitting Regime May Override Conservation**

Council is particularly troubled by the apparent intent to allow development or other activities to proceed under permit, potentially regardless of the ecological consequences. This approach prioritizes expediency over conservation and fails to reflect a balanced or sustainable approach to land use and environmental stewardship.

Furthermore, the Township recommends that the Province actively engage with local conservation authorities as the role of conservation authorities is vital in protecting species and their habitats, and any legislative changes of this magnitude must be developed in close consultation with them and with municipalities.

The Township of Puslinch urges the Province to reconsider these proposals and to uphold the strong environmental protections Ontarians expect and deserve. Weakening the Endangered Species Act threatens not only the biodiversity of our province but also the integrity of Ontario's environmental leadership.

Sincerely,

Justine Brotherston,  
Interim Municipal Clerk  
Township of Puslinch