

May 15, 2025

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

Re: ERO #025-0380 - Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025

Dear Minister McCarthy,

On behalf of the Ontario Nature Youth Council, I am writing to express our concerns on Bill 5, including the **Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025 (ERO #025-0380)**, and how through the passing of Bill 5 shows that the government is failing to learn from our past and failing to be considerate of young people and future generations.

The Ontario Nature Youth Council is a diverse provincial network of young people who are inspiring, connecting, and educating our communities while protecting wild species and wild spaces. With 96 Youth Council members from 44 communities across Ontario, we put our best selves forward as we contribute to lasting, positive change through a variety of conservation actions in our community and on a provincial level.

Ontario Nature Youth Council members across the province have been educating their peers and the public about the importance of wetlands for Ontarians, biodiversity, and the well-being of current and future generations. Below are our specific concerns with the proposed repeal of the ESA and replacement with the Species Conservation Act:

- By giving sole discretion to the Minister on the decision to list species (i.e., listing species as special concern, threatened, endangered, extirpated), essential independent and science-based processes for listing species-at-risk are removed. It is the government's responsibility to consider the perspectives of all beings and communities being impacted by one Minister's decisions. Instead, the proposal leaves so many voices in the dark and puts the futures of so many species and spaces at risk.
- By redefining "habitat" to exclude feeding or migratory sites, protections for large areas of habitat which species depend on for their survival will be lost.
- By removing the prohibition on disturbing a species-at-risk, species' behaviours or life processes could be disrupted, harming their population numbers and affecting Ontario's biodiversity.

- Requiring activities harmful to species to simply register the harmful activity without clear conditions or binding requirements removes provincial oversight
- By removing the focus on species recovery strategies and programming, the Ontario government rejects scientifically sound and protection targets for biodiversity conservation.

Bill 5 completely dismisses any consideration for the future of the land and all its inhabitants, including ours and future generations. As youth who care for Mother Earth, we envision a life filled with health and well-being, where our natural environment remains preserved. It is essential for us to have access to food security, clean air, water, and land—all of which depend on the vital species and habitats that Bill 5 attempts to destroy. The ESA was a landmark piece of legislation that is extremely important in safeguarding the habitats and lives of species-at-risk in Ontario. By removing its teeth, we are setting a dangerous precedent that will result in Ontario fast tracking development projects without assessing their impacts on these species. This will result in more species going extinct, greatly decreasing our biodiversity and resulting in a potential ecological collapse in our province.

We thank you for your time and trust that you will take our views into account for your decision as this bill affects all fellow residents of Ontario, including many of our loved ones and our neighbouring species. We invite you to meet with us to hear our viewpoint, and should you have any questions or concerns, please feel free to contact the undersigned.

Yours sincerely in conservation and on behalf of the Ontario Nature Youth Council,

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