

May 17, 2025

Public Input Coordinator
Species at Risk Branch
Ministry of Environment, Conservation and Parks
40 St Clair Ave West
Toronto, ON
M4V 1M2

Re: Feedback on Proposed Changes to Endangered Species Protection in Ontario (ERO 025-0380)

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide feedback on the Ministry of Environment, Conservation and Parks' request for comments on the proposed interim changes to the *Endangered Species Act, 2007* and proposal for the *Species Conservation Act 2025* as part of ERO 025-0380.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario – from small towns to big cities, from northern Ontario to the Greater Toronto Area.

OPPI supports the government's goal of speeding up the development of major infrastructure and natural resource projects. However, we are concerned that the proposed changes could make Ontario less prosperous and reverse progress made over the last 18 years to protect Ontario's species at risk.

We are also concerned that these changes will compromise the Planning Act and the Provincial Planning Statement. Both consider how to protect species-at-risk while also enabling strong planning principles and economic development. As such, significantly altering this Act could compromise these documents, which are integral components of Ontario's planning process.

The current *Endangered Species Act, 2007* contains a fulsome process that protects species at risk while supporting development. Protecting endangered species creates benefits beyond conservation itself. Most endangered species are integral members of delicate ecosystems that protect Ontario communities from severe weather events and support crop production.

Disrupting such ecosystems will weaken Ontario's resilience in the long term and may also damage the province's relationship with First Nations communities who have deep ties to the land and a unique and important perspective on conservation.

The proposed changes to the existing Act will weaken the province's ability to protect endangered species. Elements of the proposed changes that raise concerns include:

- Redefining habitat to only include an animal's "dwelling place" or "area immediately around the dwelling place," whereas the current Act expands the definition to also include the "area on which the species depends, directly or indirectly, to carry on its life processes." This revised definition significantly reduces the amount of habitat that must be protected, which is not enough area to allow the species to roam, hunt, live and recover.
- Giving the government the discretion to remove species from the Species at Risk in Ontario (SARO) list. Currently, every species classified by the Committee on the Status of Species at Risk in Ontario (COSSARO)—an independent scientific advisory body—is automatically added to the SARO list. This change will significantly politicize and impede the scientific classification process, which helps the Ministry to track the growing number of endangered species in the province.
- Changing the species-at-risk permitting process to create a "registration-first approach" that allows proponents to begin a development project before a permit has been provided. This change will allow proponents to bypass the Ministry of Environment, Conservation and Parks' assessment of sites. This assessment is integral to the species protection process, as it enables the Ministry to guide developers on how best they can minimize or prevent harm to local species. Allowing developments to begin before a permit and prevention plan can be produced will seriously threaten the Ministry's ability to protect endangered species.
- Removing current requirements for development projects to create recovery strategies, management plans, progress reviews and other key documents that hold developers accountable for minimizing the harm caused to endangered species. This change, in combination with the others highlighted above, will significantly increase the likelihood that new developments will harm endangered species and Ontario ecosystems.

The proposed changes to the existing Act will not only negatively impact endangered species, but they will also have knock-on effects that will harm Ontario's environmental resilience, crop production, and Indigenous relations. Rather than change the Act, we

propose that the province instead increases the efficiency of its permitting and review process for endangered species.

Thank you for the opportunity to provide feedback as the Ministry of Environment, Conservation and Parks considers changes to the Endangered Species Act. If you have any questions or would like to setup a meeting to further discuss our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Claire Basinski, MCIP, RPP, CP3
Chair



Susan Wiggins, CAE, Hon IDC
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