



May 15, 2025

Subject: Willow Beach Field Naturalists Response to the proposed Bill 5 and related legislation

RE: Environmental Registry of Ontario

025-0416 "Protect Ontario by Unleashing Our Economy Act, 2025"

025-0391 "Special Economic Zones Act", 2025

025-0380 "Proposed Interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025"

The Willow Beach Field Naturalists (WBFN) was founded in 1953 and brings together nature lovers to explore, enjoy, and learn more about Northumberland County's diverse natural environment and to encourage its preservation. The WBFN currently has 250 members with a social media outreach (Facebook, Instagram) of over 600 followers and an overall outreach of over 1.1K.

The WBFN has reviewed the proposed legislation currently posted on the Environmental Registry of Ontario (ERO), specifically:

1. Bill 5 "*Protect Ontario by Unleashing our Economy Act, 2025*"
2. Special Economic Zones Act, 2025
3. Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025.

We have great concerned about the proposed changes in these proposals that will have serious implications for the long-term conservation of species in Ontario.

We urge the government to rescind these proposals and explore more appropriate measures to achieve their stated objectives.

1. Bill 5 "Protect Ontario by Unleashing our Economy Act, 2025"

The intent of Bill 5 as a response to recent economic threats does not warrant the suspension of due process through the current legislative framework. The changes will bypass the essential scientific reviews required to ensure the long-term conservation of Ontario's wildlife.

2. Schedule 9: Special Economic Zones (Special Economic Zones Act, 2025)

The proposed Special Economic Zones Act confers unchecked power to the premier and cabinet to declare the geographic extent and the application of legal requirements within these areas. This bypasses the duly elected legislature without the critical need for public scrutiny and the need for a thorough scientific evaluation. There is no language that puts clear limits on the use and application of the SEC Act. We have serious concerns that it will be used without restriction to override key environmental and conservation legislation.

WBFN requests that the proposed Special Economic Zones Act be rescinded or at a minimum, establish clear limits to its application.

3. Schedule 10: Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025

The intent to repeal the ESA and replace it with the SCA (2025) will remove the protections for species at risk and replace it with ineffective conservation measures.

WBFN requests the retention of the ESA (2007) and recommends amendments that will expedite approvals while retaining the primary goal of long-term species conservation.

- (1) Changes to the listing/delisting of species:** The proposed legislation would transfer the authority from COSSARO to list and delist species to the premier and cabinet. The conservation of species at risk must be based on scientific assessments and free of political interference. Further, the changes will terminate the Advisory Committee with advice to be sought by the government “as needed”. There is no stated reassurance that any scientific input or review will be sought.

WBFN requests that COSSARO retain the authority to list and delist species.

- (2) Redefining Protection and changes to “Habitat”:** the proposed definitions will be very restrictive and seriously limit the protection of species. Species are part of a greater complex network of relationships and ecosystems. The narrowing down of species by their den sites or plants by their root zones ignores the scientific realities of wildlife conservation.

WBFN requests that the government adhere to the current definitions of habitat within the ESA.

- (3) Registration First Approach:** this proposal replaces the current process of obtaining a permit, bypassing the necessary reviews to avoid adverse impacts. There is too much at stake to shift this responsibility to the proponent and lends itself to misrepresenting the activity and avoiding required mitigation.

WBFN has serious concerns of potential abuse by proponents and urges the deletion of this proposal.

The WBFN also objects to other components of these proposals, including the removal of the requirement for the government to develop recovery strategies.

The Willow Beach Field Naturalists is one of many naturalist and conservation organizations across Ontario, dedicated to the conservation and enjoyment of wildlife. It is the historical lack of protection of habitats and wildlife that have led to the situation of species loss and species at risk. The loss of woodlands, wetlands, and tallgrass prairie or grasslands is the primary cause of species loss in Ontario. The proposed pieces of legislation are regressive and will drastically set back the progress made in the conservation of wildlife. ***The Willow Beach Field Naturalists strongly urge***

the government to reconsider, rescind these proposals, and seek alternative measures that will achieve economic goals while ensuring long-term conservation of wildlife in Ontario.

Thank you for your attention on this matter.

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