



November 10, 2025

Public Input Coordinator – Species at Risk Protection
Species at Risk Branch
40 St Clair Ave West
Toronto, ON
M4V 1M2
Canada

Subject: ERO 025-0908 & 025-0909 | Species Conservation Act, 2025

To whom it may concern,

On behalf of Mattamy Homes Canada, I am pleased to provide recommendations concerning the Species Conservation Act.

Mattamy Homes has a long and proud history in the homebuilding sector. Founded in 1978, we are Canada’s largest residential real estate developer, building master-planned communities and homes of every type, including single-detached, townhomes, mid-rise, and high-rise units. In Canada, our communities stretch across the Greater Golden Horseshoe Area, as well as Ottawa, Calgary, and Edmonton. Each year, Mattamy helps more than 5,000 families across Canada achieve the dream of homeownership.

Comments:

We recommend the following for consideration in consultation with the Species Conservation Act:

Developing guidance on section 16 activities under the Species Conservation Act, 2025

1. Draft guidance documents should be made available for public review prior to finalization. Providing proponents and implementers with an opportunity to review and comment will help identify potential challenges and reduce the likelihood of unforeseen implementation issues.
2. Specific technical guidance should be developed for habitats associated with bat species at risk as these species are commonly encountered on projects in southern Ontario. Specific guidance should address the treatment of isolated trees and buildings requiring demolition.
3. Furthermore, technical guidance should include the definition of “damage” to habitat to ensure uniform interpretation and application across all projects.
4. Inclusion of specific guidance on mitigation measures and alternative approaches would be beneficial as timing windows for construction may not always be feasible.

Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025

In general, we view the proposed legislative and regulatory amendments as a positive step toward streamlining development approvals. However, several key details require clarification to ensure effective and consistent implementation to balance objectives and streamline approvals.

- There are details that are lacking, including what the registration exemptions will require of proponents and how the fees for registration will be calculated. We would like an opportunity to review the regulations prior to enactment.
- Providing proponents and those responsible for implementing the regulatory framework an opportunity to review will help identify and address concerns before they arise.
- The province should clarify how Conservation Actions will be identified, evaluated and approved. It is our understanding that this may include habitat restoration, mitigation, and/or support for key research priorities. Clear criteria or “tests” should be established, to the extent they may apply.
- Similar to MyOntario accounts, we recommend that the new registration system include the ability for proponents to designate a qualified representative to assist with completing and managing registrations.

Sincerely,



Andrew Murphy
Vice President, Land Development
Mattamy Homes Canada