



Nov. 10, 2025

To:

Chloe Stuart, Assistant Deputy Minister, Land and Water Division, Ontario Ministry of the Environment, Conservation and Parks, chloe.stuart@ontario.ca

CC:

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Assistant Deputy Minister Stuart,

Re: Biigtigong Nishnaabeg Comments on the Proposals related to *Species Conservation Act, 2025*.

Enclosed please find the response of Biigtigong Nishnaabeg (formerly the Ojibways of Pic River First Nation) to the Ministry's email notifications of September 25 and September 26, 2025 regarding proposals related to the *Species Conservation Act, 2025* as posted on the Environmental Registry of Ontario (ERO).

Biigtigong Nishnaabeg understands that the proposals related to the *Species Conservation Act, 2025* are being undertaken in response to Schedule 2 and Schedule 10 of the *Protect Ontario by Unleashing our Economy Act, 2025*. The attached **Comment Disposition Table** outlines Biigtigong Nishnaabeg's review, comments, concerns and required next steps with respect to the proposals; including consideration of the proposed legislative and regulatory amendments to enable the *Species Conservation Act, 2025*, and the development of guidance on section 16 activities under the *Species Conservation Act, 2025*.

We believe closer collaboration with Biigtigong Nishnaabeg – and other First Nations – in the management and regulation of species at risk and other general species management activities would produce stronger, more holistic and effective outcomes for Ontario species.

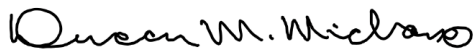
Please note that while we are providing comments on the *Species Conservation Act, 2025* proposals specifically, we would also like to reiterate once again to the Government of Ontario the following with respect to the *Protect Ontario by Unleashing our Economy Act, 2025*:

1. Biigtigong Nishnaabeg is not a signatory to the Robinson Superior Treaty of 1850 and has filed a claim for Aboriginal title in the Ontario Superior Court of Justice (court file no. CV-07-018). Biigtigong Nishnaabeg is currently in settlement negotiations with both Canada and Ontario regarding this claim. By asserting Aboriginal title, Biigtigong Nishnaabeg has given notice to the Crown that it has never ceded its lands, or agreed to share its lands, through the signing of a treaty.

2. Biigtigong Nishnaabeg reiterates the strong opposition, as expressed by the Chiefs of Ontario, to Ontario's recently passed Bill 5, citing its failure to respect the constitutional and treaty rights of First Nations. The legislation, which fundamentally weakens environmental and cultural protections and reduces consultation requirements with First Nations, is a direct violation of the Government of Ontario's obligations to uphold the honour of the Crown.
3. Biigtigong Nishnaabeg reiterates the concerns expressed to Hon. Doug Ford in its letter of May 15, 2025 with respect to Bill 5, *Protect Ontario by Unleashing our Economy Act, 2025*.
4. Biigtigong Nishnaabeg specifically reiterates its strong opposition, as expressed to MECP in a letter dated May 16, 2025, with respect to Schedule 2 (immediate amendments to the *Endangered Species Act, 2007*) and Schedule 10 (introduction of the *Species Conservation Act, 2025*) of Bill 5, *Protect Ontario by Unleashing our Economy Act, 2025*. Biigtigong Nishnaabeg is of the view that the response received from MECP on July 28, 2025 wholeheartedly fails to address any of our stated concerns with respect to how the changes enacted impact our Aboriginal Title rights, and further erode provincial treaty implementation, co-management, and environmental stewardship. Form letter responses to our concerns are unacceptable and is not a fulfillment of the Crown's Duty to Consult. Furthermore, it is Biigtigong Nishnaabeg's view that the Crown has yet to demonstrate how it will meaningfully address the concerns raised by and impacts to the rights of Biigtigong Nishnaabeg.

I look forward to your response to this correspondence.

With Respect,



Duncan Michano, Chief of Biigtigong Nishnaabeg

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Comment Disposition Table: Biigtigong Nishnaabeg’s Comments on the Proposed Regulations and Guidance for the <i>Species Conservation Act, 2025</i>	
Issue:	Solution:
<p>“Protected Species in Ontario List” regulation</p> <p>Biigtigong Nishnaabeg strongly opposes the removal – from the Protected Species in Ontario List – of the 64 Special Concern species including the six (6) species that were classified as Special Concern in COSSARO’s 2024 Annual Report. By failing to provide Special Concern species with protections, Ontario’s is – through willful negligence – further guaranteeing that these species will eventually end up classified as extirpated, endangered or threatened.</p> <p>Biigtigong Nishnaabeg also strongly opposes the removal of the 42 aquatic species (fish and mussels) and migratory bird species, that are currently listed under the ESA, in order to reduce so-called “duplication” because they are protected under the federal <i>Species at Risk Act</i>. It is not appropriate to rely on federal processes, as these consider species threats and strategies for protection at a much larger spatial scale, and do not necessarily account for the unique habitats and biodiversity of Ontario. This will also result in inconsistencies in the level of required protection (i.e., for species that may have been classified as endangered provincially but threatened federally). It is overly simplistic and incredibly misleading to suggest to the public that federal and provincial approaches to species protections can be used interchangeably. It is our opinion that this will generate even more confusion and lack of clarity for proponents attempting to develop species protection measures associated with their sustainable development projects. Moreover, it is inappropriate to pass the buck to Canada to develop strategic guidance for species protection and recovery in our unique province.</p> <p>Biigtigong is alarmed by and strongly opposed to the Minister’s complete discretionary authority over the addition to, or removal of species from the list of protected species. Introducing additional discretionary mechanisms undermines the transparent intent and scientific integrity of the government’s stated objectives. Independent experts are increasingly calling for reduced reliance on discretionary power in species listing processes (Gordon et al., 2024; Westwood et al., 2019; Turcotte et al., 2021) in order to uphold the intent and integrity of species protection laws – Ontario should not be moving in the opposite direction. Furthermore, the unpredictability stemming from this change will only create more confusion and inefficiency for project proponents and practitioners – the very thing that Ontario is trying to curb through the implementation of Bill 5. Abandoning a comprehensive decision-making process based on the best available Western science and Indigenous Knowledge only serves to weaken the integrity of species protection efforts. Meanwhile other jurisdictions (i.e., the Species at Risk Committee in the Northwest Territories) are critically</p>	<p>Biigtigong Nishnaabeg recommends reinstating the 64 Special Concern species and the 42 aquatic species and migratory bird species to the Protected Species in Ontario List.</p> <p>Biigtigong Nishnaabeg recommends a transparent and collaborative decision-making process be established to determine additions to or deletions from the Protected Species in Ontario List. This process should be based on the best available Western science and Indigenous Knowledge; and incorporate principles of joint decision-making structures with First Nations in recognition of the fact that decisions related to species have direct impacts to Aboriginal and treaty rights as the exercise of those rights are contingent upon the availability and abundance of specific species in specific geographies. Specifically, we recommend that Ontario review and adopt an approach similar to the Northwest Territories Species at Risk Committee’s unique dual assessment and listing process, which a) uses two separate sets of criteria – one based in Indigenous Knowledge and the other in science, and b) appropriately limits government discretion.</p>

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<p>evaluating and strengthening their own process (Singer et al., 2023), demonstrating that SAR legislation improvement is achievable and can occur in tandem with resource development goals.</p>	
<p>Registration regulation</p> <p>The proposed Registration regulation significantly weakens Ontario’s permitting system by removing critical oversight from qualified MECP staff. It also circumvents the Crown’s Duty to Consult affected First Nations, particularly where inherent Aboriginal and treaty rights intersect with species at risk and habitat protections.</p> <p>The Registration regulation does not provide for the meaningful consultation of First Nations with respect to species at risk matters prior to the onset of disruptive activities. Biigtigong Nishnaabeg will not tolerate a standard for species at risk impact assessment, mitigation, measures to achieve overall benefit, and overall authorization that falls below the protections currently required under the <i>Endangered Species Act, 2007</i>. In other words, we shall not provide consent for companies to put shovels in the ground before we are fully satisfied that species at risk have been considered, will be protected, and sufficient compensation measures have been developed. We argue that relying upon this Registration regulation (in the absence of sufficient species at risk legislation), will provide even less clarity and consistency for proponents, resulting in further delays to progress on critical infrastructure.</p> <p>The Registration regulation posting indicates that “Information submitted to the Registry <i>may</i> be made publicly available to support transparency” [emphasis added]. This implies the onus will be placed on First Nations to regularly review the online Registration system in order to be notified of activities occurring within their territories. This is completely unacceptable. Under the Registration system, Ontario would be exercising a power, duty or function that would trigger the Duty to Consult. Failure to engage First Nations in this would constitute Ontario’s failure to fulfil the Duty to Consult and will result in nothing less that continuous court challenges.</p> <p>The posting also indicates the pursuit of “common requirements for all (or most) registerable activities. These proposed requirements aim to create clarity, promote responsible planning, and support conservation outcomes, while balancing the need for sustainable social and economic growth.” In pursuit of common requirements, this system completely ignores geographic, habitat and species site-specific issues. Protective actions that are effective in one area for one species may not be suitable in another, for example isolated populations may be much more vulnerable to</p>	<p>Biigtigong Nishnaabeg recommends Ontario pursue a clear and robust permitting system, rather than the weakened Registration system. Biigtigong is of the view that the process for receiving authorizations related to species at risk can be improved upon by adding clear and consistent guidance to existing strategy documents (e.g., management plans, recovery strategies, etc.) and appropriately resourcing the MECP to attend to authorization processes in a timely and efficient manner.</p> <p>Biigtigong Nishnaabeg recommends that Ontario establish a clear process for consultation and engagement with First Nations in the permitting and authorization system for species matters. This process is a bare minimum requirement for the Crown to fulfil the Duty to Consult and to meaningfully address concerns and impacts to Aboriginal and treaty rights. Authorizations that disrupt and disturb species and habitats have direct impacts to Aboriginal and treaty rights as the exercise of those rights are contingent upon the availability and abundance of specific species in specific geographies.</p>

Comment Disposition Table: Biigtigong Nishnaabeg’s Comments on the Proposed Regulations and Guidance for the *Species Conservation Act, 2025*

Issue:

activities that further fragment their range (e.g., road building, large tracts of land clearing in specific locations) than continuous species ranges.

The posting indicates “Registrants *may* be required to work with qualified professionals to develop site-specific conservation plans that include actions to avoid or reduce impacts on species and their habitats” [emphasis added]. If proponents are not required to work with qualified professionals, they won’t. They will instead choose to keep such work in-house to save costs but doing so will result in completely inappropriate and uninformed actions for the protection of species.

Finally, we note that no permits to harm species or their habitats have been denied since the Endangered Species Act was passed in 2007 (Office of the Auditor General of Ontario, 2021). Reports also show that companies or organizations who complain to higher levels within the Ministry obtain permits for development 43% faster than had they not complained (Office of the Auditor General of Ontario, 2021). In other words, the existing framework for assessing impactful activities and determining the need for an authorization has never stopped a project from proceeding and Ontario has demonstrated their ability to speed the process. With this in mind, we reiterate that the permitting system itself does not need to change – rather the way Ontario resources it does.

The following are the conservation actions that Biigtigong Nishnaabeg recommends:

1. Find a balance with the precautionary approach based on addressing unreasonable timelines which may occur when implementing the precautionary approach
2. Ensure mandatory non-partial expert review before on-the-ground project commencement
3. Bring expeditious scientific and Indigenous oversight into determinations as to how to avoid harm to species at risk
4. Bring consideration of cumulative effects into the project review stage
5. Restore pre-approval processes, but expedite the schedule on which they occur
6. Ensure scientific and Indigenous oversight in the issuance of approvals and implementation of significant government or independent oversight on self-reporting and post-activity monitoring
7. Ensure adequate oversight of self-reporting, and post-activity commencement monitoring
8. Restructure or empower branches/offices within government ministries to balance the need for expeditious project approvals and assuring appropriate integrity of approvals

Solution:

While we agree that publicizing minimum, standard measures would be beneficial for the purposes of transparency and predictability, Biigtigong Nishnaabeg maintains that Ontario’s process must continue to allow for adaptability and applicability to specific circumstances, rather than a one-size-fits-all “common requirements” approach. Establishing an adaptable approach will provide for greater on-the-ground conservation outcomes for species while affording for social and economic growth and development.

Biigtigong Nishnaabeg recommends that all proponents be required to work with qualified professionals to develop site-specific conservation plans – this will ensure high-quality and effective measures that allow for development to occur while protecting species and habitats.

Comment Disposition Table: Biigtigong Nishnaabeg’s Comments on the Proposed Regulations and Guidance for the *Species Conservation Act, 2025*

Issue:

Permit regulation

The proposed Registration regulation above appears to apply to almost all activities that negatively impact species. The only activities for which a permit are required – under this Permit regulation – are the killing of a protected animal species and the introduction of a protected animal species where it does not naturally occur. All other activities fall under the Registration regulation. In only requiring the registration of activities, Ontario is de facto authorizing nearly all harmful activities to proceed.

Ontario has whittled down the applicability of its previous permit requirements to this small subset of activities, one of which should never be knowingly allowed (i.e., killing a protected animal species) and the other of which may, as a direct result of Ontario’s increasing apathy toward species recovery, become a new normal necessity to prevent or recover from species extirpation (i.e., introducing a protected species to a new area). Through the Registration and Permit regulations, Ontario is signaling to proponents that it is “open season” for harming, disrupting and destroying already extirpated, endangered or threatened species. Biigtigong questions what possible conservation outcome Ontario is hoping to achieve with such a weakened permitting system?

The following are the activities for which Biigtigong Nishnaabeg recommends a permit be required:

1. Destroying, degrading, or impinging upon habitat known to be used by a species at risk
2. Destroying, degrading, or impinging upon a rare habitat known to be important to a species at risk
3. Destroying, degrading, or impinging upon species at risk habitat where species at risk are known to occur in the vicinity, or there is a recent record of occurrence
4. Removal or destroying a nest, den, or other structure used by a species at risk
5. Conducting activities that may disturb or disrupt a species at risk during breeding season

Solution:

As stated above, Biigtigong Nishnaabeg recommends Ontario pursue a clear, robust, and properly resourced permitting system, rather than the weakened Registration and Permit system. Biigtigong is of the view that the process for receiving authorizations related to species at risk can be improved upon by adding clear and consistent guidance to existing strategy documents (e.g., management plans, recovery strategies, etc.), ensuring the development of minimum protection standards for newly listed species are proactively communicated to proponents and practitioners, and appropriately resourcing the MECP to attend to authorization processes in a timely and efficient manner.

This Permit system will require a clear process for consultation and engagement with First Nations. This process is a bare minimum requirement for the Crown to fulfil the Duty to Consult and to meaningfully address concerns and impacts to Aboriginal and treaty rights. Authorizations that disrupt and disturb species and habitats have direct impacts to Aboriginal and treaty rights as the exercise of those rights are contingent upon the availability and abundance of specific species in specific geographies.

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	<p>In addition, permits should not be required if the introduction of a protected animal species is required to restore a First Nation’s ability to exercise their Aboriginal and Treaty rights lost due to Crown decision-making or inaction relating to protection of culturally important species at risk. Requiring a permit under these circumstances while allowing a fast-track registration approach for proponents demonstrates that Ontario is interested in reducing red tape for some parties but not others.</p>
<p>Exception regulation</p> <p>Biigtigong Nishnaabeg notes that some exceptions set out in O.Reg 242/08 are reasonable – in that they allow interventions to protect and conserve species at risk and their habitats (e.g., sections 15 through 18, 23.17.1 through 23.17.2, 23.11, etc.) are in place to protect harvesters (e.g., sections 20, 21, 23.19) or are in place to protect human health or property (e.g., sections 8, 9, 23.18). However, many others represent measures that Ontario has added over time to erode the intent and integrity of the original <i>Endangered Species Act</i> - once considered the gold standard species at risk legislation in Canada. Biigtigong Nishnaabeg takes particular exception with section 23.10, which provides exceptions for early exploration mining, an industry that already has few guardrails or requirements related to consultations with affected Indigenous groups.</p> <p>Regardless of the above perspectives, meaningful consultation can only be undertaken when complete and accurate documentation is shared to allow for fulsome understanding, review and comment by Biigtigong Nishnaabeg. To date, Ontario has not provided sufficient information on exception regulations under the <i>Species Conservation Act, 2025</i> and as such further consultation is required prior to interpretation and extrapolation of the general views expressed above.</p>	<p>In general, exception regulations that seek to uphold the integrity of species protection and conservation legislation are supported by Biigtigong Nishnaabeg. However, as stated above, a transparent and collaborative decision-making process should be established to determine any exception regulations under the <i>Species Conservation Act</i>.</p> <p>It is Biigtigong Nishnaabeg’s view that consultations must occur on each and every regulation contemplated under the <i>Species Conservation Act, 2025</i>. Such consultation should be conducted with First Nations, in a separate process from the public, and should consider how the amendments proposed could impact upon Aboriginal and treaty rights.</p>

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<p>Transition regulation</p> <p>This proposed regulation includes the alarming allowance for “persons to seek the cancellation of certain permits, agreements, and registrations and proceed under a new registration or permit under the SCA.” Past permits and approvals should have been issued following consultation with First Nations and should have included mitigations and accommodations to address First Nations concerns. Allowing proponents to seek the cancellation of their permits, agreements and registrations completely negates the prior inclusion of First Nations input and has the potential to reinstate the negative activities that contribute to impacts to Aboriginal and treaty rights as it relates to specific species and habitats. It is Biigtigong Nishnaabeg’s view that the cancellation of permits, agreements and registrations would constitute a negative adverse impact on Biigtigong Nishnaabeg’s Aboriginal Title and rights, and the rights of First Nations generally in Ontario.</p>	<p>Biigtigong Nishnaabeg recommends that all prior permits, agreements and registrations be maintained, with no opportunity for cancellation. Ontario cannot arbitrarily cancel processes that include mitigations for impacts to rights. Such inconsistency in regulation tells proponents that Ontario is not serious about protecting species and habitats and provides for significant uncertainty for social and economic growth and development.</p>
<p>Proposed Regulatory Amendments under the Environmental Bill of Rights</p> <p>The posting for this proposal indicates that Ontario is “proposing to exempt all permits and orders issued under the <i>Species Conservation Act, 2025</i> from the requirements of Part II of the Environmental Bill of Rights.”</p> <p>Part II of the Environmental Bill of Rights provides for “Public Participation in Government Decision-Making” and sets out “minimum levels of public participation that must be met before the Government of Ontario makes decisions on certain kinds of environmentally significant proposals for policies, Acts, regulations and instruments.” It is astonishing to Biigtigong Nishnaabeg that Ontario is proposing this exemption. Ontario is seeking take away fundamental freedoms guaranteed under a free and fair democracy by removing the ability of the public to participate, voice concerns and be consulted on the actions of government. It is Biigtigong Nishnaabeg’s view that EVERY action made under the <i>Species Conservation Act, 2025</i> would be environmentally significant because it concerns species already pushed to the brink of their very existence due to human activity. In no way should activities undertaken per the <i>Species Conservation Act, 2025</i> be exempt from the Environmental Bill of Rights. This is unacceptable and will inevitably be challenged in court.</p> <p>Biigtigong Nishnaabeg would also like to reiterate that while the Environmental Registry of Ontario (ERO) is absolutely vital for the fundamental democratic right of public participation in government, it is not the appropriate vehicle by which to solicit feedback from First Nations. First Nations have rights protected under Section 35 of the Constitution. Impacts to such constitutionally protected</p>	<p>Biigtigong Nishnaabeg recommends all activities under the <i>Species Conservation Act, 2025</i> continue to be applicable to Part II of the Environmental Bill of Rights. Additionally, Biigtigong recommends Ontario establish a separate and clear process for consultation and engagement with First Nations. This process is a bare minimum requirement for the Crown to fulfil the Duty to Consult and to meaningfully address concerns and impacts to Aboriginal and treaty rights. Authorizations that disrupt and disturb species and habitats have direct impacts to Aboriginal and treaty rights as the exercise of those rights are contingent upon the availability and abundance of specific species in specific geographies.</p>

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Issue:	Solution:
<p>rights must be considered in dedicated and intentional consultation arenas. First Nations should never be lumped in with regular public consultation processes.</p> <p>Legislative and Other Regulatory Amendments</p> <p>The posting for this proposal indicates that the changes contemplated here with respect to the new <i>Species Conservation Act, 2025</i> will have implications for six other pieces of legislation and nine other regulations. The posting for this proposal does not specify what amendments are being considered, only that amendments are required.</p> <p>Meaningful consultation can only be undertaken when complete and accurate documentation is shared to allow for fulsome understanding, review and comment by Biigtigong Nishnaabeg.</p> <p>Biigtigong Nishnaabeg reminds Ontario to look to the requirements of the <i>United Nations Declaration on the Rights of Indigenous People</i> (UNDRIP) and the principle of Free, Prior and Informed Consent (emphasis added). Consultation cannot be meaningful if the parties are not provided with the information required to be informed.</p> <p>Biigtigong Nishnaabeg reminds Ontario of the decision of <i>Beckman and Little Salmon/Carmack First Nation</i>, where the Supreme Court held that “a decision maker who proceeds on the basis of inadequate consultation errs in law.” [Reference: Beckman v. Little Salmon/Carmack’s First Nation, 2010 SCC 53 at para 48].</p>	<p>Noting the scale and scope of impacts the <i>Species Conservation Act, 2025</i> and the proposed regulations contemplated herein will have, it is Biigtigong Nishnaabeg’s view that consultations must occur on each and every piece of legislation and regulation wherein “legislative and other regulatory amendments” are contemplated. Such consultation should be conducted with First Nations, in a separate process from the public, and should consider how the amendments proposed could impact upon Aboriginal and treaty rights.</p>
<p>Policy Guidance</p> <p>The ERO posting indicates that “The government is proposing guidance materials to assist in assessing whether an activity is likely to have an impact to a protected species or species’ habitat such that a registration or permit would be required. The proposed new guidance will aim to update and replace the existing ESA policies and technical direction on species and habitat protection...The draft guidance is still in development...This notice will be updated as components of the proposed guidance are available for review.”</p> <p>Until such time as fulsome documents are shared for comment, Biigtigong Nishnaabeg cannot comment on the ‘Policy Guidance’ as included in this posting.</p>	<p>It is Biigtigong Nishnaabeg’s view that consultations must occur on each and every regulation contemplated under the <i>Species Conservation Act, 2025</i>. Such consultation should be conducted with First Nations, in a separate process from the public, and should consider how the amendments proposed could impact upon Aboriginal and treaty rights.</p>

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Issue:	Solution:

References:

Gordon, S. C., Duchesne, A. G., Dusevic, M. R., Galán-Acedo, C., Haddaway, L., Meister, S., ... & Bennett, J. R. (2024). Assessing species at risk legislation across Canadian provinces and territories. *Facets*, 9(1), 1-18.

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Turcotte, A., Kermany, N., Foster, S., Proctor, C. A., Gilmour, S. M., Doria, M., ... & Bennett, J. R. (2021). *Fixing the Canadian species at risk act: Identifying major issues and recommendations for increasing accountability and efficiency (Vol. 6, pp. 1474–1494). FACETS.*

Westwood, A. R., Otto, S. P., Mooers, A., Darimont, C., Hodges, K. E., Johnson, C., ... & Whitton, J. (2019). *Protecting biodiversity in British Columbia: Recommendations for developing species at risk legislation. FACETS, 4 (1), 136–160.*