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By email: Forest.Policy@Ontario.ca

Re: ERO-025-1134 - Natural Resources Regulatory and Permit Reform Initiative:
Improving forest legislation, regulations, processes and forest management policy

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore riverine ecosystems across the province. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally responsible, socially just, and climate resilient.

ORA's comments are informed by long experience working with Ministry of Natural Resources professionals whose mandate has been to protect, restore, and sustainably manage Ontario's forests, rivers, and watersheds for present and future generations.

ORA recognizes that MNR staff enter the natural resources profession to apply science, exercise precaution, and prevent irreversible harm. The concerns raised in this submission are therefore directed at the policy and regulatory direction set by government—which increasingly constrains professional discretion and weakens long-standing safeguards—rather than at the expertise or intent of Ministry staff charged with implementing these changes.

1. Forestry Deregulation as a Catalyst for River and Hydropower Impacts:

ERO-025-1134 cannot be assessed as a stand-alone forestry modernization exercise. It forms one component of a coordinated regulatory framework that, when combined with ERO-025-1145 (Renewable Energy on Crown Land), ERO-025-1078 (Public Lands Act streamlining), and ERO-025-1141 (economic reforms), will materially increase development pressure on Ontario's rivers, particularly through a new tranche of hydropower proposals.

Forests are inseparable from river systems. Forest management decisions directly influence watershed hydrology, sediment transport, mercury mobilization, thermal regimes, and flood response. Weakening forest oversight, therefore, has predictable and compounding downstream



consequences for river ecosystems already under stress from climate change and cumulative development.¹

2. Permit-by-Rule and Self-Registration Undermine Watershed Protection:

The proposal repeatedly advances permit-by-rule, registration, and extended licence frameworks as efficiency measures. From a watershed perspective, these approaches are deeply problematic. Forest operations—roads, crossings, harvest blocks, aggregate extraction, and land clearing—are among the primary drivers of cumulative effects on aquatic ecosystems. Removing site-specific approvals and reducing Crown oversight at these stages increases the likelihood that impacts to streams and rivers will be normalized, fragmented across permits, and effectively invisible to regulators until damage is entrenched.

Federal fisheries science confirms that cumulative effects, rather than individual projects, are the dominant cause of fish habitat degradation.^{2, 3} Project-by-project and activity-by-activity approaches are structurally incapable of managing these risks. By expanding permit-by-rule approaches in forest management, the Province is moving in the opposite direction of best available science.

3. Continuous Forest Management Planning and Loss of Precaution:

ORA is concerned that the shift toward longer, more consolidated forest management planning cycles reduces meaningful opportunities for adaptive management under rapidly changing climate conditions. Climate-driven increases in extreme rainfall, freeze-thaw cycles, drought, wildfire, and pest outbreaks fundamentally alter hydrologic response and erosion risk in forested watersheds.^{4, 5}

Locking in harvest patterns, access corridors, and infrastructure assumptions while simultaneously weakening approval triggers reduces MNR professionals' ability to exercise precaution when conditions change. This is particularly concerning in watersheds targeted for renewable energy and hydropower development, where forestry disturbance compounds flow alteration, sedimentation, stream temperature and downstream risks.

4. Forestry Deregulation as Enabling Infrastructure for Hydropower:

ORA's primary concern is that forestry deregulation under ERO-025-1134 functions as enabling infrastructure for hydropower expansion. Forest roads, cleared corridors, stream crossings, and altered drainage patterns are often precursors to hydropower feasibility, access, and construction. When combined with:

- Crown land prioritization for renewable energy (ERO-025-1145), and
- Reduced Public Lands Act authorizations for early-stage activities (ERO-025-1078),

The forestry reforms proposed here complete a regulatory pipeline that accelerates hydropower development while narrowing points of oversight.



For ORA, this pipeline is of particular concern because it facilitates the advancement of new dam-based hydroelectric projects—the primary source of methane emissions, water-quality degradation, methylmercury contamination, and long-term declines in fish populations in Ontario rivers.

This is not speculative. It is a foreseeable outcome of aligning forest, land, and energy policy toward speed and volume rather than watershed resilience.

5. Climate Change, Mercury, and Long-Term River Harm:

Forestry disturbance in northern and boreal watersheds is a well-documented driver of mercury mobilization into aquatic systems. When combined with hydropower impoundment and altered flows, mercury impacts are magnified and prolonged. Mercury contamination is not a short-term effect; it persists for decades, directly affecting Indigenous food security and downstream communities.⁶

Ignoring these interactions while weakening forest oversight is inconsistent with Ontario's Climate Change Impact Assessment and with federal freshwater science. Climate change is not a background condition—it is an accelerant that makes regulatory rollback more dangerous, not less.

6. Public Safety, Financial Risk, and Century-Scale Consequences:

The risks associated with this forestry ERO must be considered in the context of the infrastructure that proponents routinely claim will operate for 100 years or more. Hydropower dams, transmission corridors, and associated forest access are not temporary disturbances. They are long-lived interventions that lock in altered hydrology, sediment regimes, and public-safety obligations under increasingly volatile climate conditions.

Weakening forest oversight at the front end undermines the regulatory defensibility of downstream infrastructure. Banks, insurers, and the public ultimately bear the risk when poorly planned, climate-exposed projects fail. Forestry deregulation, therefore, contributes not only to ecological harm but to long-term public liability.

7. The Need to Assess All Four EROs Together:

ORA reiterates that ERO-025-1134 must be assessed together with ERO-025-1145, ERO-025-1078, and ERO-025-1141. Different staff contacts and postings do not change the integrated outcome. Together, these reforms reduce oversight, accelerate land access, and externalize risk—creating a predictable surge in hydropower and related infrastructure on Ontario rivers.

Assessing them in isolation obscures cumulative impacts and undermines informed decision-making.



8. ORA Recommendations:

1. **Withdraw ERO-025-1134:**
Withdraw ERO-025-1134 and re-issue it with an explicit analysis of cumulative watershed, river, and hydropower impacts in conjunction with related ERO postings.
2. **Reject expansion of permit-by-rule and self-registration:**
Reject expansion of permit-by-rule approaches and self-registration for forest operations that affect watersheds, riparian areas, and stream crossings.
3. **Retain and strengthen Crown oversight:**
Retain and strengthen site-specific Crown oversight for forest activities with potential downstream aquatic impacts.
4. **Watershed-Scale Cumulative Effects Assessment:**
Mandate watershed-scale cumulative effects assessment for all as a condition of forest management planning, particularly projects and policy decisions affecting rivers and Crown lands, recognizing that incremental approvals and permit-by-rule approaches systematically fail to manage cumulative ecological harm.
5. **Alignment with Ontario's Climate Change Impact Assessment:**
Require that all regulatory, land-use, and economic decisions affecting rivers and hydropower explicitly align with Ontario's Climate Change Impact Assessment (2023), including consideration of increasing extreme flows, drought risk, infrastructure vulnerability, and long-term climate liability.
6. **Prohibit Use of Forestry to Facilitate New Dam-Based Hydropower:**
Explicitly prohibit the use of forestry to facilitate new dam-based hydropower development, recognizing that reservoir creation is the primary driver of methane emissions, water-quality degradation, methylmercury contamination, fish population decline, and long-term climate and economic harm.
7. **Require an Independent Full Life-Cycle Economic Cost-Benefit Analysis:**
Prior to any policy or project pathway that would enable new dam-based hydropower, Ontario must require an independent, transparent life-cycle CBA that monetizes, at minimum, the cumulative economic costs over the full claimed operating life (100+ years) of: methane and other GHG emissions; degraded water quality and increased drinking-water treatment; methylmercury contamination and associated health and food-security impacts; forest loss; altered hydrology and flood damage; fisheries decline; tourism and recreation losses; and increased costs to conservation authorities and municipalities. The analysis must include climate change scenarios, cumulative effects, sensitivity analysis, and explicit disclosure of discount rates and assumptions.
8. **Decoupling Procurement from Land and Regulatory Decisions:**
Decouple IESO procurement outcomes and economic acceleration objectives from Crown land allocation and regulatory approval decisions to prevent outcome-predetermination and erosion of precautionary safeguards.
9. **Recognition of Healthy Rivers as Climate-Resilience Infrastructure:**
Establish a provincial position recognizing healthy free-flowing rivers and forest canopies as climate-resilience infrastructure that avoids reservoir methane emissions, supports landscape-level carbon storage, and provides flood mitigation, water-quality protection, biodiversity, and long-term economic value that exceeds the short-term gains of new dam-based hydropower.
10. **Indigenous Rights, Consultation, and Consent:**



Ensure Indigenous consultation and consent occur early and meaningfully—prior to land prioritization, procurement decisions, or regulatory streamlining—recognizing the disproportionate and long-lasting impacts of hydropower and river fragmentation on Indigenous food systems, rights, and cultural practices.

9. Closing Statement:

ERO-025-1134 does not represent neutral modernization of forest policy. When combined with concurrent Crown land, Public Lands Act, and economic reforms, it forms part of a coordinated deregulation agenda that will predictably intensify pressure on Ontario's rivers through expanded hydropower and associated infrastructure. Weakening forest oversight at a time of accelerating climate change, cumulative watershed stress, and public-safety risk is neither precautionary nor responsible. ORA urges the Province to halt this trajectory and restore a science-based, integrated approach to forest, land, and river stewardship that protects Ontario's natural heritage for present and future generations.

Free-flowing rivers are among Ontario's most valuable and climate-resilience assets. Once fragmented, flooded, or abandoned, they cannot be easily or cheaply restored. ORA urges the Ministry to withdraw these amendments, **re-ground Crown land policy in contemporary science and Indigenous rights and reject the false premise that new hydropower—particularly under the 10-MW scale—is compatible with climate responsibility or watershed protection.**

Thank you for this opportunity to comment!

Respectfully,

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Cc: MNR – ERO-025-1141, Unlock Economic Potential – Public.Lands@Ontario.ca
MNR – ERO-025-1078, Public Lands Act – Public.Lands@Ontario.ca
MNR – ERO-025-1145, Andrew Chard – MNRRenewableEnergyPolicy@Ontario.ca

¹ Murray, C., Hannah, L., & Locke, A. (2020). *A Review of Cumulative Effects Research and Assessment in Fisheries and Oceans Canada*. <https://waves-vagues.dfo-mpo.gc.ca/Library/40851576.pdf>

² Cormier, R. et al. (2022). *Cumulative Effects Considerations for Integrated Planning in DFO*. https://publications.gc.ca/collections/collection_2023/mpo-dfo/fs70-5/Fs70-5-2022-079-eng.pdf

³ Murray, C., Hannah, L., & Locke, A. (2020). *A Review of Cumulative Effects Research and Assessment in Fisheries and Oceans Canada*. <https://waves-vagues.dfo-mpo.gc.ca/Library/40851576.pdf>

⁴ Murray, C., Hannah, L., & Locke, A. (2020). *A Review of Cumulative Effects Research and Assessment in Fisheries and Oceans Canada*. <https://waves-vagues.dfo-mpo.gc.ca/Library/40851576.pdf>



⁵ Environment and Climate Change Canada. Synthesis of Freshwater Science in Canada.
<https://www.canada.ca/en/environment-climate-change/services/water-overview/protecting-freshwater/national-freshwater-science-agenda/synthesis-freshwater-science-overview/synthesis.html>

⁶ Environment and Climate Change Canada. Synthesis of Freshwater Science in Canada.
<https://www.canada.ca/en/environment-climate-change/services/water-overview/protecting-freshwater/national-freshwater-science-agenda/synthesis-freshwater-science-overview/synthesis.html>