



21 December 2025

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Public Lands
MNR-CFLPB-Crown Lands Policy Section
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Re: ERO-025-1141 – Natural Resources Regulatory and Permit Reform Initiative:
Unlocking Ontario's Economic Potential

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. Economic Policy as the Capstone of Deregulation:

ERO-025-1141 functions as the economic and policy capstone to a suite of regulatory reforms that, taken together, materially alter how Ontario's lands, waters, and rivers are governed. While framed as improving competitiveness and efficiency, this posting consolidates and justifies a coordinated shift toward deregulation that prioritizes speed, volume, and access over precaution, cumulative-effects management, and long-term public interest.

For ORA, the central concern is that ERO-025-1141 explicitly enables and accelerates a new wave of hydropower and associated infrastructure development on Ontario rivers by aligning economic policy with concurrent reforms under:

- **ERO-025-1145** – prioritization of Crown lands for renewable energy and waterpower;
- **ERO-025-1078** – removal of early Public Lands Act authorizations that currently function as precautionary gates; and



- **ERO-025-1134** – expansion of permit-by-rule and self-registration approaches in forest management that directly affect watersheds.

Different postings and different Ministry contacts do not alter the integrated outcome. Together, these reforms create a predictable **pipeline effect** that narrows the points at which Ontario can still meaningfully assess, constrain, or refuse damaging hydropower proposals.

2. False Economics Framing that Externalizes Risk:

The economic narrative advanced in ERO-025-1141 rests on a false premise: that environmental oversight constitutes “red tape” rather than risk management. In reality, environmental approvals, cumulative-effects assessment, and Crown oversight exist to prevent the transfer of long-term ecological, financial, and public-safety costs from proponents to the public.

Federal freshwater and fisheries science demonstrates that cumulative effects, not individual projects, are the dominant drivers of ecosystem decline, and that incremental deregulation systematically obscures these risks rather than reducing them.^{1,2} By weakening early-stage oversight while accelerating access and approvals, the Province externalizes risk to rivers, Indigenous Nations, and future generations.

3. Hydropower as a Central Beneficiary of Deregulation:

Although presented as benefiting the entire economy, ERO-025-1141 disproportionately favors capital-intensive, land- and water-dependent infrastructure like hydropower. Hydropower projects require early access to Crown land and river corridors, extensive forest clearing, long approval timelines, and capital certainty. Therefore, aligning economic policy with land, forestry, and permitting deregulation is not incidental—it is instrumental.

This alignment directly contradicts contemporary freshwater and climate science.³

4. Climate Change, Methane, and Long-Term Economic Exposure:

ERO-025-1141 is notably silent on climate risk and greenhouse gas exposure. Peer-reviewed research has established that reservoir-based hydropower, particularly facilities with shallow headponds and peaking operations, can be significant sources of methane emissions, which increase over time as sediments accumulate and temperatures rise.

Economic policy that accelerates century-scale infrastructure without accounting for cumulative emissions, hydrologic volatility, and declining ecological resilience is not forward-looking. It exposes the Province to stranded assets, reputational risk, and future remediation costs inconsistent with Ontario’s climate commitments.

5. Public Safety, Finance, and the Myth of “Low-Risk” Infrastructure:

The deregulatory approach consolidated under ERO-025-1141 also raises serious public-safety and financial concerns. There are no genuinely “low-hazard” hydropower dams under current and projected climate conditions. Extreme rainfall, ice dynamics, debris loading, and altered flow regimes have already rendered historic hazard classifications obsolete.



From a financing perspective, banks and insurers rely on strong, independent regulatory approvals as a proxy for risk management. Projects advanced through permit-by-rule, self-certification, and reliance on proponent-retained professionals are inherently less defensible, less insurable, and less attractive to serious capital. Federal or provincial funding does not eliminate this risk; it amplifies public exposure when projects fail.

6. Century-Scale Commitments and Intergenerational Liability:

Hydropower proponents routinely claim that facilities will operate for 100 years or more, and provincial planning decisions increasingly rely on these assumptions. Approving century-scale infrastructure through weakened regulatory frameworks commits future governments and generations to decades of dam-safety obligations, sediment management, greenhouse gas emissions, and downstream risk under an increasingly unstable climate.

Economic policy that accelerates such commitments without robust safeguards violates principles of intergenerational equity and sound public finance.

7. No New Hydroelectric Dams as an Economic and Climate Imperative:

ORA submits that the Province’s economic framework must explicitly recognize that the most significant and irreversible harms associated with hydropower arise from the construction and operation of **new hydroelectric dams and impoundments**. It is the creation of reservoirs—particularly shallow headponds and peaking facilities—that drives methane emissions, degraded water quality, methylmercury production, sediment accumulation, altered thermal regimes, and the long-term decline of iconic and economically important fish populations. These impacts are structural, not incidental, and they intensify over time rather than diminishing.

From an economic perspective, authorizing new hydroelectric dams locks Ontario into decades of escalating climate liability, infrastructure risk, public-health costs, and ecosystem service loss at a time when climate change is already imposing unprecedented strain on public infrastructure and emergency response systems. Hydropower that relies on new dams is therefore not a climate solution; it is a contributor to the very instability that is driving long-term economic loss.

Accordingly, ORA submits that Ontario’s economic policy must preclude the development of new hydroelectric facilities that require dams or impoundments. At the very least, where government is unwilling to adopt a clear prohibition, such projects must be excluded from any fast-tracked, streamlined, or preferential economic pathway and subjected to the highest level of scrutiny, cost internalization, and precautionary assessment.

8. Full Life-Cycle Economic Costs Ignored by “Economic Unlocking” Framework:

ERO-025-1141 frames hydropower and associated infrastructure as contributors to long-term economic prosperity while failing to account for their full life-cycle costs. Reservoir-based hydropower does not merely generate electricity; it imposes persistent and compounding economic burdens through greenhouse gas emissions, forest loss, degraded water quality, and long-term infrastructure liability.



Methane emissions from reservoirs—particularly shallow headponds and peaking facilities—are now well documented and increase over time as sediments accumulate and temperatures rise. These emissions directly undermine climate-mitigation efforts and contribute to accelerating climate instability, imposing indirect costs on Ontario’s infrastructure through flooding, erosion, heat stress, and emergency response.

In addition, hydropower development permanently removes forest cover, fragments watersheds, mobilizes mercury, and degrades water quality, imposing downstream costs on drinking water systems, fisheries, recreation, tourism, and Indigenous food security. These are not abstract environmental losses; they represent real and ongoing economic liabilities borne by municipalities, conservation authorities, Indigenous Nations, and taxpayers. Treating hydropower as an economic asset while excluding these costs from analysis constitutes a fundamental misrepresentation of its true economic performance. An economic framework that ignores the escalating costs of a warming and destabilizing climate is not unlocking prosperity—it is locking Ontario into long-term fiscal exposure.

Any economic policy that accelerates hydropower development without requiring proponents to internalize these costs transfers risk from private actors to the public and violates basic principles of sound fiscal governance.

9. The Need for Integrated Assessment of All Four EROs:

ORA reiterates that ERO-025-1141 cannot be assessed in isolation. It is the economic instrument that binds together land-use, forestry, and regulatory streamlining reforms into a single deregulatory architecture. Assessing each posting separately obscures cumulative impacts and undermines informed decision-making.

Ontario’s rivers do not experience impacts in silos, and neither should policy review.

10. ORA Recommendations:

Ontario’s rivers and Crown lands are long-lived public trust assets. Regulatory reform must not facilitate new hydroelectric dams that degrade watershed resilience, accelerate climate change, and impose irreversible ecological, economic, and public-safety costs on present and future generations:

- 1. Withdraw ERO-025-1141:**
Pending a fully integrated assessment of all four Natural Resources Regulatory and Permit Reform Initiative postings.
- 2. Reject Economic Framing of Environmental Safeguards as “Red Tape”:**
Explicitly recognize the role of environmental safeguards in risk management, public safety, and fiscal responsibility.
- 3. Retain independent Crown oversight:**
Reject reliance on proponent-retained professionals as substitutes for regulatory review.
- 4. Align Economic Policy with Ontario Climate Change Impact Assessment:**



Ontario's Energy for Generations, and economic policy has totally ignored freshwater science, its own 2023 Ontario Climate Change Impact Assessment, and intergenerational equity obligations.

- 5. 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.
- 6. No New Dam-Based Hydroelectric Development:**
Explicitly prohibit new hydroelectric development that uses dams or impoundments on Crown or public land, recognizing that dam construction is the primary driver of methane emissions, degraded water quality, methylmercury production, habitat fragmentation, and long-term decline of iconic fish populations in Ontario rivers.
- 7. Exclusion from Fast-Tracked or Streamlined Pathways:**
At a minimum, exclude all dam-based hydroelectric projects from any fast-tracked, streamlined, registration-only, or preferential regulatory or economic pathway, including Crown land prioritization, permit-by-rule frameworks, or procurement-driven approvals.
- 8. Watershed-Scale Cumulative Effects Assessment:**
Mandate watershed-scale cumulative effects assessment for all 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.
- 9. Alignment with Ontario's Climate Change Impact Assessment (2023):**
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.
- 10. Up-Front, Secured Decommissioning and Restoration:**
Require enforceable, legally binding end-of-life plans for all hydroelectric facilities, including full dam removal, sediment management, and river restoration, backed by fully secured, up-front financial assurance sufficient to cover all future costs, adjusted for inflation and climate risk.
- 11. Effective, Demonstrated Fish Passage:**
Prohibit approval of any hydroelectric project where effective, multi-species fish passage across all life stages cannot be demonstrated under current and projected climate-driven flow conditions, recognizing fisheries as ecological, cultural, and economic assets.
- 12. Rejection of Proponent-Retained "Qualified Professional" Substitution:**
Reject reliance on proponent-retained "qualified professionals" as a substitute for independent Crown oversight, particularly where cumulative effects, public safety, Indigenous rights, and long-term ecological risk are at issue.
- 13. 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.

14. Rejection of Energy for Generations as a Planning Basis:

Explicitly prohibit reliance on *Energy for Generations* as a needs-assessment, climate-alignment, or justification document for hydropower or Crown land decisions unless and until it is independently reviewed and updated to reflect current methane science, cumulative effects research, and Ontario's Climate Change Impact Assessment.

15. 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.

16. Recognition of Healthy Rivers as Climate-Resilience Infrastructure:

Establish a provincial position recognizing free-flowing rivers 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 exceeding the short-term gains of new dam-based hydropower.

11. Closing Statement:

ERO-025-1141 crystallizes a policy direction that treats Ontario's rivers, forests, and Crown lands as expendable inputs to an "energy superpower" narrative rather than as foundational public-trust assets. When combined with concurrent reforms, it creates a foreseeable surge in hydropower development that externalizes ecological, climate, and public-safety risk while narrowing the Province's ability to say no. Unlocking Ontario's economic potential cannot—and must not—come at the expense of its rivers, its climate commitments, or the well-being of future generations.

An economic agenda that accelerates infrastructure which fuels climate change while offloading its long-term costs onto the public is not prosperity-building; it is deficit creation by another name.

An economic strategy that continues to permit new hydroelectric dams—despite overwhelming evidence of their climate, ecological, and fiscal harm—is not unlocking Ontario's economic potential; it is entrenching long-term public liability in an era of accelerating climate crisis.

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.**

This government must decide whether it wishes to leave an environmental and economic legacy it can defend, or one that will, in the near future, be recognized as a failed experiment in deregulation that accelerated climate damage, degraded Ontario's rivers, and imposed long-term costs on the public. Responsibility for that outcome will rest squarely with the policy decisions made under this government.

Thank you for this opportunity to comment!



Respectfully,

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MNR – ERO-025-1134, Forest Management Policy – Forest.Policy@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 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>