



January 16, 2026

Public Input Coordinator
Ministry of Natural Resources | Fish and Wildlife Policy Branch
300 Water St, 2nd Floor, South Tower
Peterborough, ON
K9J 3C7
Canada

Re: Conservation Ontario's comments on "Natural Resources Regulatory and Permit Reform Initiative: Updates to natural heritage technical guidance for renewable energy projects" (ERO#025-1146)

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management and land conservation and management. These comments are not intended to limit comments submitted individually by CAs on this proposal.

The Ministry of Natural Resources (MNR) is proposing updates to the Natural Heritage Assessment Guide for Renewable Energy Projects ("the Guide"), to align with proposed changes to Ontario Regulation 359/09 under the *Environmental Protection Act*.

Under O. Reg. 359/09, applicable renewable energy projects are required to complete a Natural Heritage Assessment (NHA), guided by the evaluation technical criteria and procedural guidance set out in the Guide. This process requires proponents to analyze available information from various levels of government and agencies, including Conservation Authorities, to determine the presence of significant natural features to inform decisions about site feasibility for renewable energy projects.

Proposed updates to the Guide include alignment with wetland evaluation criteria in the 2022 Ontario Wetland Evaluation System manuals, incorporating content from the Bird and Bird Habitat and Bat and Bat Habitat Guidelines, clarification on MNR's roles and responsibilities, and housekeeping changes to update out of date content.

Conservation Ontario and Ontario's 36 Conservation Authorities share the Province's commitment to supporting timely and safe development of renewable energy projects, while protecting natural features and systems. The Guide provides positive

recognition for how CA watershed information and science can support informed decision-making for renewable energy projects.

The MNR is proposing to update the Guide to “improve clarity and readability and to **update or remove out of date content**” (emphasis added).

References to CAs within the Guide require updates to ensure conformity with the amended *Conservation Authorities Act* and Ontario Regulation 41/24 (Prohibited Activities, Exemptions and Permits), the latter replacing the previous individual CA “Development, Interference and Alteration” Regulations. **Recommended edits are provided in Attachment 1.**

Conservation Ontario supports references in the Guide for proponents to “contact the local conservation authority early in the NHA process for specific application requirements and for permissions”. As watershed management organizations, CA’s work collaboratively with renewable energy project proponents to provide timely reviews and approvals for projects in accordance with their legislative mandate (see subsection 28.1(6) of the *Conservation Authorities Act*). Early and ongoing engagement can help ensure project proponents request relevant CA technical information and confirm necessary permitting requirements early in the process, helping to inform decisions for the renewable energy project.

Thank you for the opportunity to review and provide comments on “Natural Resources Regulatory and Permit Reform Initiative: Updates to natural heritage technical guidance for renewable energy projects” (ERO#025-1146). We would be pleased to further discuss these comments at your convenience.

Sincerely,

Nicholas Fischer

Nicholas Fischer
Policy and Planning Specialist

c.c: Conservation Authority CAOs/GMs

Attachment 1: Proposed updates to select references to Conservation Authorities in the “Natural Heritage Assessment Guide for Renewable Energy Projects”.

Section	Current Text (NHA Guide)	Recommended Edit(s)
<p>1.4.1 Conservation authority permissions</p>	<p>Renewable energy projects may require permission from the local conservation authority (where one exists). Through conservation authorities' <i>Development, Interference and Alteration Regulations</i>, under Section 28 of the <i>Conservation Authorities Act</i>, conservation authorities are empowered to regulate development and activities in or adjacent to wetlands, river or stream valleys, watercourses, Great Lakes and large inland lakes shorelines and hazardous lands. Development taking place on these lands may require permission from the conservation authority to confirm that the control of flooding, erosion, dynamic beaches or pollution is not affected. Conservation authorities also regulate the straightening, changing, diverting or interfering in any way with the existing channel of a river, creek, stream, or watercourse, and changing or interfering in any way with a wetland. It is recommended that applicants contact the local conservation authority early in the NHA process for specific application requirements and for permissions.</p>	<p>Renewable energy projects may require a permit from the local conservation authority (where one exists). Through Section 28.1 of the <i>Conservation Authorities Act</i> and Ontario Regulation 41/24, conservation authorities are empowered to regulate development and activities in or adjacent to wetlands, river or stream valleys, watercourses, Great Lakes and large inland lakes shorelines and hazardous lands. Development activities taking place on these lands may require permission from the conservation authority to confirm that the control of flooding, erosion, dynamic beaches, unstable soil or bedrock is not affected. Conservation authorities also regulate the straightening, changing, diverting or interfering in any way with the existing channel of a river, creek, stream, or watercourse, and changing or interfering in any way with a wetland. It is recommended that applicants contact the local conservation authority early in the NHA process for specific application requirements and for permits.</p>
<p>5.5 Wetlands and coastal wetlands</p>	<p>Resources for conducting site investigations of wetlands</p> <p>Conservation Authorities</p>	<p>Conservation Authorities</p> <ul style="list-style-type: none"> conservation authorities maintain regulated area mapping, depicting the location of various natural hazard features, including wetlands. These mapping resources may be

	<ul style="list-style-type: none"> many conservation authorities have identified wetlands as part of their regulation mapping and may be able to provide information to support the site investigation process 	able to provide information to support the site investigation process.
B.1.2 Conservation organization information sources	Provincially Significant Wetlands and Significant Coastal Wetlands <ul style="list-style-type: none"> Conservation authorities may be able to provide mapping of the area within their jurisdiction that is subject to their Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation, which may assist applicants in identifying unevaluated wetlands. 	Provincially Significant Wetlands and Significant Coastal Wetlands <ul style="list-style-type: none"> Conservation authorities may be able to provide mapping of the area within their jurisdiction that is subject to Ontario Regulation 41/24, which may assist applicants in identifying unevaluated wetlands.