

ERO 025-0909 & 0908 Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025; 025-0908 Developing guidance on section 16 activities under the Species Conservation Act, 2025. Nov 10/25 timeline

I appreciate the goal of modernizing Ontario's approach to species protection. However, we are deeply concerned that the proposed *Species Conservation Act (SCA)* under Bill 5 would weaken long-standing safeguards for Ontario's most vulnerable species and habitats.

While efficiency is important, it must not come at the cost of ecological integrity or public trust. The new SCA would allow many activities that harm species or habitats to proceed through self-registration or broad exemptions, with limited oversight under the *Environmental Bill of Rights*. This shift away from the former *Endangered Species Act's* "protect first" approach prioritizes development speed over science-based assessment and accountability.

Key outcomes are alarming: 64 "special concern" species would lose all protection; 42 aquatic or migratory species would be removed from provincial oversight; and industry-developed "conservation plans" would replace independent review. These changes fragment Ontario's biodiversity framework at a time when ecosystems are already stressed by climate change and habitat loss.

Healthy ecosystems are our natural climate allies, storing carbon, buffering floods, and sustaining clean water. I urge Ministers to retain science-based permitting, precautionary habitat protection, and public participation rights. Protecting species protects all Ontarians.

Sincerely,
[Your Name]