

May 16, 2025

To: Premier Ford, Minister of Environment Conservation and Parks Todd McCarthy, Minister of Natural Resources and Forestry Graydon Smith and all PC MPPs:

Since 2007, BurlingtonGreen has worked with the community through advocacy, action and awareness to protect the environment, mitigate climate change and to create a healthier, more environmentally responsible Burlington. Together with other environmental advocacy organizations and engaged residents, we strive to protect what we have and reverse the damage caused by human activity while there is still time. To date we have advocated on more than 200 environmental issues, and we have planted almost 80,000 native plants and trees, and removed a countless number of invasive plant species from the region to restore habitat and improve local biodiversity.

The protection of species and their habitat, benefits the people of Ontario that your government serves. It ensures a healthy ecosystem that supports clean air, clean water, carbon sequestration, flood-resistance, and a more stable climate, to name a few. These benefits are essential to the health and well-being of the people of Ontario and thus we urge you to scrap the proposed Bill 5 and instead strengthen biodiversity protections.

Ontario has been a laggard, dragging its heels on new protected areas and enacting “pay-to-slay” provisions for species at risk to benefit industry.

As identified by Ontario Nature, a number of the proposed measures of Bill 5 are notable for their weakening of endangered species protections and potential implications for the rights of Indigenous Peoples. Some of these include:

- i. Redefining “habitat” to just immediate dwellings like dens or nesting sites will remove protections from large areas of habitat upon which species depend for their survival;
- ii. The discretionary listing of species removes an essential independent and science-based assessment process;
- iii. Offloading responsibility for migratory birds and aquatic species to the federal government is an unprecedented abrogation of provincial responsibility and negates the essential collaboration between both levels of government;
- iv. Allowing developers or industry to simply register and then operate without clear conditions or binding requirements removes the province's ability to ensure sustainable operations and avoid adverse impact on endangered species;
- v. Eliminating recovery strategies makes it nearly impossible to assess, mitigate and avoid harms to species;
- vi. The proposal to terminate the environmental assessment process for the Eagle’s Nest mine in the Ring of Fire creates the potential for developments without the consent of impacted Indigenous Peoples; and,

vii. The text and preamble of the Species Conservation Act (SCA) creates an impression that it is purely performative and is not intended to prevent the ongoing decline of endangered species in practice,

Additionally, exempting some developments from archeological assessments may result in negating required consultation with Indigenous communities and First Nations governments.

The consequences of this Bill are far reaching, permanently changing Ontario for the worse. We urge you to halt this proposal and instead strengthen the ESA so that species can flourish, communities can benefit from conservation, with Indigenous rights being respected.

Sincerely,

A handwritten signature in cursive script, reading "Amy Schnurr".

Amy Schnurr
Executive Director
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