



High Park Natural Environment Committee
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May 7, 2025

To: Environmental Registry of Ontario ESAREg@ontario.ca

Cc: Premier Ford premier@ontario.ca, Alexa Gilmour agilmour-gp@ndp.on.ca

Re: Proposed Amendments to the Endangered Species Act, 2007

We strongly object to the Ontario government's proposal to severely weaken the Endangered Species Act in order to make it easier to develop and exploit the province's natural resources. The government has a responsibility to protect our natural heritage for the long term and should be focused on fulfilling this responsibility.

The amendments would shift nearly all species-related authorizations to a registration-first approach. This puts too much responsibility in the hands of developers and apparently eliminates any prior review of a project by government staff.

The removal of "harass" from Section 9 prohibitions against individual species would only leave "kill, harm, or capture" as prohibitions. This could be a significant change for many projects that would cause disturbance (noise, fear response, avoidance of an area, etc.) that severely impact species at risk.

Similarly, "habitat" is being given an extremely narrow definition that does not take into account the fact that species move during different life stages and seasons and use broader territories for foraging, hunting, etc.

The proposed amendments would remove the requirements to develop recovery strategies and management plans, government response statements, and reviews of progress. These amendments would eliminate comprehensive environmental assessment processes and expedite mining initiatives, even in ecologically sensitive and contested territories.

In general, these changes are a big step in the wrong direction – away from protection and toward exploitation. The Endangered Species Act, 2007 was a milestone in Ontario's protection of natural heritage. It should not be undone by the current government's obsession with growth at any cost. We call on the government to take the long view and protect our province's natural heritage, including its endangered species and habitats, for the long term.

Submitted by Karen Yukich
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*The High Park Natural Environment Committee has been educating the public
and advocating for the natural heritage of Toronto's High Park since 1993.*