



Quinte Field Naturalists

The Quinte Field Naturalists Association is affiliated with Ontario Nature, a non-profit organization sponsoring nature education, conservation and research.

May 16, 2019

Public Input Coordinator
Ministry of the Environment, Conservation and Parks
Species Conservation Policy Branch
300 Water Street
Floor SN
Peterborough, ON
K9J 3C7
Cc: MPP Todd Smith
Minister Rod Phillips
Premier Doug Ford

Dear Sir/Madam,

We, the members of the Quinte Field Naturalists, strongly urge the Government to remove Schedule 5 entirely from Bill 108. We plead with you not to proceed with the proposed changes to the Endangered Species Act (ESA).

A strong ESA is a trademark of a progressive government, a government that understands and values the strands of relationships between the natural world and humanity, relationships that will become increasingly vital in the years to come, in the lives of our children, grandchildren, great grandchildren and for generations after. Our descendants will judge us by the actions we have taken, or not taken, to protect the natural environment. All creatures who dwell in our natural surroundings, including each of our species at risk, have an important purpose in the complex web of life. A strong ESA is vital.

The current work of COSSARO is very valuable and should not be downgraded in any way. There should be no delay in the listing of species assessed by COSSARO. Delay puts species at risk and the habitats they live in at ever greater risk. The Minister's

proposed ability to second guess COSSARO decisions would make the opportunity to challenge these decisions easier and easier. The requirement that COSSARO assessments be based not on the status of a species in Ontario but instead on its status across its “biologically relevant geographic range” would be simply ‘passing the buck’. What if a species becomes endangered in other jurisdictions? What if other jurisdictions withdraw protections for the species? Furthermore, COSSARO membership should consist solely of scientific experts. They are the people who have the knowledge to make the decisions to list species. Decisions would be ‘watered down’ with discussion clouded by the input of non-experts.

The implications of any change must be reviewed in depth, taking into account all of the effects of actions, both short and long term. Changes such as delaying or limiting protections for species at risk and their habitats would allow short-sighted or political interests to override the protection and recovery of species at risk. The ESA, through the permitting and exemptions process, already provides ample flexibility for the interests of industry and development. Also, proposed changes to the ESA that would delay required policies and reports, such as the Minister’s ability to delay the development of a Government Response Statement (GRS) indefinitely would erase from the public eye the transparency of Government actions, exclude Ontarians from consultation processes, eliminate accountability of the Government to the people and would lessen greatly the protection of species at risk.

In conclusion, the proposed changes to the ESA would make it easier for industry and development proponents to proceed with harmful activities. The purpose of the ESA is to protect species at risk, not to help industry and development. The current ESA allows flexibility for industry and development to proceed: the changes in the proposed ESA shift the advantage far too much to industry and development.

We strongly urge the Government to remove Schedule 5 entirely from Bill 108, for the sake of the species and habitats at risk and for the sake of our children and future generations.

Yours truly,

George W. Thomson
President
Quinte Field Naturalists