



Quinte Field Naturalists

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

2020 12 18

Ministry of Municipal Affairs and Housing
Queen's Park

Dear Minister Steve Clark:

The Quinte Field Naturalist Association, consisting of 99 members, is strongly opposed to the Government's proposal of new regulations to enable use of the Species at Risk Conservation Fund and to establish a provincial agency to administer the Fund.

In Ontario, there are over 230 plant and animal species that are at risk of extinction or of disappearing from our province. This number is growing every year. Every species makes valuable contributions to the functioning of a balanced ecosystem. How will the option of allowing a proponent of development to pay into the Species at Risk Conservation Fund help all of these species? How will the selection of only 6 eligible species help to protect vital habitats, habitats which will become rarer as development proceeds? What criteria were used to select these species?

The option of contributing to a fund is not a good solution: it does not ensure comparable ecosystem benefits to the affected species. In the proposal, the bar is set too low because the quality and functions of the replacement habitat are not considered. It is possible that some communities will see natural areas destroyed or degraded, with no local reparation. Even when restorative attempts are made in other locations, they may not provide the same level of benefit elsewhere. According to the International Union for the Conservation of Nature, biodiversity offsets generally have very limited success and net gains have rarely been realized in practice.

As the Human population on our planet continues to grow, some carefully placed development is needed. In the initial stages of securing property for development, it should be recognized that the natural habitats, the ecosystems of which the species at risk are representative, are all also vitally important for the people of Ontario, now, and in the future. Ecosystems, such as forests and wetlands, provide essential services for all of life, including us. They are purifiers of ground water, storehouses of carbon that mitigates the effects of global warming, providers of water storage & flood protection and they all are treasure houses of biological diversity. The wide array of ecosystems, ecological processes and species is essential to our existence and will be required by generations to come. Considering the value of biodiversity, the trend worldwide is to set aside natural areas for protection, to conserve the critically important services they provide.

In Ontario, wise decisions need to be made to preserve our natural heritage now. We implore the Government of Ontario to use foresight, to emphasize the protection of Nature in its plans for development, to **not streamline the ESA by the option of the Species at Risk Conservation Fund.**

Sincerely,

George Thomson
QFN President