

January 22, 2007

Debbie Ramsay, Manager  
Species at Risk Legislative Review  
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Dear Ms. Ramsay:

**Re: A Review of Ontario's Species at Risk Legislation**  
**EBR Registry No. AB06E6001**

Via e-mail to [Debbie.ramsay@mnr.gov.on.ca](mailto:Debbie.ramsay@mnr.gov.on.ca)

**Thank you for the Additional Opportunity to Input**

Thank you for the additional opportunity to comment on the Species at Risk legislative review as per the Minister's remarks in December 2006. We appreciated the opportunity to provide on-line feedback regarding the Discussion Paper and its leading edge proposals and we refer you to our July 5, 2006 letter on letterhead as requested of organizations. At this time, we commend the Province of Ontario for taking steps to strengthen Ontario's *Endangered Species Act*. These reforms are long overdue.

**FORCE**

As you may be aware, Friends of Rural Communities and the Environment (FORCE) is a federally registered not for profit corporation. It is a citizen-based advocacy group with hundreds of supporters in Kilbride, Campbellville, Mountsberg, Freelon, and Carlisle. FORCE was formed in June 2004 to protect our natural and built environments in the face of a proposed large-scale, below the established groundwater table, aggregate development in the Northeast Flamborough portion of the amalgamated City of Hamilton. We note upfront that our organization is neither anti-aggregate nor anti-road; indeed, our area is home to some of Ontario and Canada's largest aggregate operations. We do, however, have significant issues with the pending application in its proposed location for substantive reasons; reasons that relate to ground water protection, active and productive agricultural operations, acknowledged fragile natural systems, including species at risk, and existing rural communities.

We also believe that our organization has a responsibility to promote good government in the municipal and provincial arenas and therefore, we have a responsibility to input into the broader planning reform processes which bear upon the application processes for development proposals such as the one before our communities. The revision of Species at Risk legislation is clearly an opportune time to impact the ground rules about how we should be protecting, recovering and enhancing species and their habitats as well as how development proposals should be evaluated and approved in a municipal jurisdiction and by MNR.

## **General Comments**

We are writing to request that the Ministry of Natural Resources (MNR) act now on the recommendations of the Endangered Species Act Advisory Panel regarding new endangered species legislation for Ontario. The ministry has engaged in a fulsome consultative approach providing a variety of means to comment on its Discussion Paper, hosting stakeholder working groups, engaging in dialogue with our First Nations, and appointing the Advisory Panel. Having reviewed the stakeholder consultation summary results and the Advisory Panel's report, we feel that the Panel's report presents a balanced, science-based approach that focuses on protecting endangered species and their habitat while recognizing the need for stakeholder support and participation. We can strongly support their recommendations.

The appointment of the Advisory Panel was a clear indication of the MNR's commitment to update the Act and to make it the best in Canada. Ontario's outdated *Endangered Species Act* is failing to do the job. The vast majority of endangered species receive no protection whatsoever under the existing legislation. It is scientifically documented that many species are facing unprecedented decline and have disappeared from our jurisdiction or are on the way to such an end. The MNR should heed the Panel's advice and move quickly to enact effective legislation that includes:

- Mandatory protection for all endangered (including threatened) species and their habitats;
- An independent, science-based process for including species under the legislation;
- A requirement to prepare and implement recovery plans; and
- Adequate resources to do the job properly.

We urge the MNR to do everything it can to make new endangered species legislation that incorporates the Advisory Panel's recommendations a government priority in the upcoming session of the Legislature which resumes in March 2007.

## **Thank You Again**

Thank you again for the opportunity to input to this important review of Species at Risk legislation. We commend the Province for its sustainability leadership in this area and encourage it to move with dispatch. We look forward to the final product and the impact it will have on the advocacy for and protection of species at risk and their habitats as well as the quality of land use planning decisions.

Respectfully submitted,

A handwritten signature in black ink that reads "G. Flint". The signature is written in a cursive style with a large, looped "G" and a horizontal line underneath the entire signature.

Graham Flint BAsC, P. Eng  
Chair & Spokesperson