



**ONTARIO  
RIVERS  
ALLIANCE**

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Leanne Jennings  
Species at Risk Branch  
Species at Risk Recovery Section  
300 Water Street  
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Peterborough, ON K9J 3C7

By Email: [Leanne.Jennings@Ontario.ca](mailto:Leanne.Jennings@Ontario.ca)

Re: ERO-019-1749, Developing GRSs for nine Species at risk under the Endangered Species Act, 2007

Dear Ms. Jennings:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization acting as a voice for several stewardships, organizations, private and Indigenous members who have come together to protect, conserve and restore Ontario riverine ecosystems.

The province is proposing Government Response Statements (GRSs) outlining the actions government will take and support to protect and recover nine species at risk in Ontario. Blanding's Turtle Eastern Whip-poor-will, Little Brown Myotis, Northern Bobwhite, Northern Myotis, Spiny Softshell Spotted Turtle, Tri-colored Bay and White Wood Aster.

The ORA supports all of the draft GRSs under this Environmental Registry posting. The recommended actions all seem to be in alignment with each species' recovery and if implemented properly should play a key role in protecting these species and Ontario's biodiversity.

However, ORA objects to one statement that appears in all of the draft recovery strategies under 'Implementing Actions', which states, "*Implementation of the actions may be subject to changing priorities across the multitude of species at risk, available resources and the capacity of partners to undertake recovery activities*". This single sentence places all of the above GRSs and recovery strategies in a state of uncertainty.

A perfect recent example was in the recent Environmental Registry posting, ERO-019-1620 – Proposed amendment to a regulation under the Endangered Species Act (ESA), 2007, relating to Forest Operations in Crown Forests. This proposal amounted to a blanket exemption to the ESA for logging activity in Crown Forests. Yet the ERO in its 'Proposal details' states, "*Ontario is committed to providing strong protections for species at risk and improving outcomes by modernizing and improving the effectiveness of the Endangered Species Act, as committed to in our Made-in-Ontario Environment Plan*". This statement is misleading when instead the proposed amendment would set aside the ESA for an entire industry when logging on Crown land.



This ERO proposal describes the GRSs as providing “*stringent protections for species at risk and their habitats under the Endangered Species Act*”, but how stringent are these protections when the legislation can be so easily set aside? This means that protection and recovery under the ESA is uncertain for all species at risk.

ORA objects to this above statement being included in the GRS, and strongly recommends that it be removed.

Respectfully,

Linda Heron  
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