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LONG-TERM THINKING FOR TODAY'S ISSUES

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May 18 2019

The Honourable Rod Phillips,  
Ministry of Environment, Conservation and Parks  
11th Floor, Ferguson Block, 77 Wellesley St. W.  
Toronto, ON, M7A 2T5  
Delivered via email: minister.mecp@ontario.ca

**Re: ERO 013-5033 10th Year Review of Ontario's Endangered Species Act: Proposed changes**

Dear Minister Phillips,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming.

CFFO appreciates the opportunity to comment on your government's decision to proceed with its proposed amendments to the Endangered Species Act, 2007, which are intended specifically to "streamline approvals and provide clarity to support economic development."

As Christian farmers we are committed to our God-given responsibility to steward all resources. We therefore work daily to produce food and at the same time do our best to meet that responsibility. It is not conceivable for us to consider the sensibility of simply paying a fee, as you propose for developers, to make way for economic development at the cost of habitat loss. Furthermore, we are concerned about the apparent intention to speed decisions via Ministerial discretion, even without scientific evidence.

We cannot support the core intention of your changes to the Endangered Species Act, 2007, that prioritizes short-run economic development and developer profitability goals at the expense of long-run stewardship of our shared scarce resources, including species that are at risk or already endangered. This is short-sighted policy. We need more effort by government to more creatively design effective protections for species, and all resources, that also support economic growth. CFFO farmers work towards these joint goals daily and we ask that the government does so as well.

Respectfully yours,

Clarence Nywening, President  
Christian Farmers Federation of Ontario  
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cc: Hon. Doug Ford, MPP, Premier of Ontario  
Hon. Ernie Hardeman, MPP, Minister of Agriculture, Food and Rural Affairs  
Hon. Steve Clark, MPP, Minister of Municipal Affairs and Housing  
Hon. Caroline Mulroney, MPP, Attorney General