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May 15, 2019

Public Input Coordinator

Ministry of the Environment, Conservation and Parks
Species Conservation Policy Branch
300 Water Street, Floor 5N
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BY ENVIRONMENTAL REGISTRY OF ONTARIO (ERO) SUBMISSION ONLY

To whom it may concern,

Re: Proposed Changes to Ontario's Endangered Species Act (ERO number: 013-5033)

On March 5th, Aroland First Nation submitted a joint comment letter to the Ministry of Environment, Conservation, and Parks (MECP) regarding the Ministry's review of the Endangered Species Act (ERO number: 013-4143). The submission focused on ways to improve safeguards for Species at Risk under the *Endangered Species Act* and ensure a more meaningful role for Indigenous peoples and their unique traditional ecological knowledge in these efforts. In addition to comments addressing each of the four areas of focus in the discussion paper, we provided comments about the need for legislation and regulations that require true collaboration with First Nations regarding Ontario's Species at Risk protection and recovery efforts.

We have completed a review of the MECP's proposed changes to the *Endangered Species Act* and are deeply concerned by them. Specifically, we believe that they are regressive in terms of protections for Species at Risk and that **our comments regarding the engagement of First Nations people in Ontario in the protection of Species at Risk were not addressed in any meaningful way**. We oppose the proposed changes regarding relaxing protections on species and their habitat, elevating Ministerial decision-making power over species listings and mechanisms of protection, and extending timelines for provincial obligations for protection and recovery planning, and are concerned that they will negatively impact our rights.

In light of our above concerns we are resubmitting our comments and urging the MECP to demonstrate more meaningful engagement with Indigenous peoples on this highly important and valued legislation.

Sincerely,

Councillor Mark Bell
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Public Input Coordinator
Ministry of the Environment, Conservation and Parks
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March 5, 2019

PLEASE NOTE: This is a revised version of the comment letter submitted on March 4, 2019 (Comment ID: 23760). Please refer to this version (letter dated March 5, 2019) moving forward.

Dear to whom it may concern:

Re: 10th Year Review of Ontario's *Endangered Species Act*: Discussion Paper (ERO number: 013-4143)

The First Nations listed below, are putting forward this submission to the Ministry of Environment, Conservation, and Parks (MECP) regarding the 10th Year review of Ontario's *Endangered Species Act*. Our submission focuses on the involvement of First Nations, including those involved in Indigenous Guardians programs, in Species at Risk protection and recovery in Ontario, as well as more effective integration of Traditional Ecological Knowledge in species listing and recovery planning efforts.

Our comments are the result of a unique and rapid engagement process among the undersigned, to meet the short deadline for comments provided by the MECP. This engagement process was facilitated and supported by technical experts from Shared Value Solutions Ltd.¹, who consulted with lawyers from Olthius, Kleer, Townshend LLP. Along with comments organized in parallel with the four areas of focus in the Endangered Species Act Discussion Paper, we provide a primary comment on the need to have legislation and regulations that require true collaboration with First Nations regarding Ontario's Species at Risk protection and recovery efforts. First Nation stewardship activities contributing to the conservation of species should be recognized and supported as an integral element in Ontario's efforts at preventing species from becoming at risk, and helping threatened species recover.

¹ Experts from Shared Value Solutions Ltd. supporting these comments include Richard Baxter, B.Sc.; Meaghan Langille, B.Sc., EPT; Allie Mayberry, M.A., B.Sc; Don Richardson, Ph.D.; Jeremy Shute, M.A.,RPP, and; Rachel White, M.Sc.

We note, for the record, that notification of the comment period on the 10th Year Review of Ontario's Endangered Species Act and invitation to an input gathering session towards the 10-year review of such an important Act should not be considered in anyway to be consultation with any First Nation. In the absence of "pro bono" services from Shared Value Solutions Ltd., our First Nations would not have the capacity to provide comments toward the review of such an important Act within a 45-day comment period. Each of First Nations require direct engagement on this review by MECP: this engagement cannot occur before the comment window is closed, but the MECP can make the time required, and provide the capacity required, for meaningful and thorough engagement. Further, the MECP should provide assurance to each First Nation that the Ministry will accommodate and incorporate input from such future engagement sessions within its 10-year review.

We approach the 10-year review with the impression that the MECP may have already predetermined the desired outcome of the *Endangered Species Act* review process; to achieve a relaxed *Endangered Species Act* with longer species listing times, longer time frames in which to develop recovery strategies and government response statements, and more regulatory by-passes and "work arounds" for industry. The examples of questions provided in the Discussion Paper used to help guide reviewers in developing comments, appear to be biased to representing industry-first perspectives and possibly MECPs desired outcomes of the *Endangered Species Act* review². In general, we fear that this review, and MECPs potentially desired outcomes, will achieve a streamlined process that will largely benefit industry/economic priorities and have little to no positive gains for the protection of species at risk or their habitats.

As we were preparing and reviewing these comments, Grandmother Josephine Mandamin, passed away on February 22, 2019 at the age of 77. We lost a visionary who made it her life's work to call for cleaner water and greater water protection for the benefit of all species. She logged more than 17,000 kilometres on sacred water walks around the perimeter of all five of the Great Lakes and numerous other waterways around the world to raise awareness about the need to protect water. She completed her final sacred water walk in 2017. Honouring the spirit of Grandmother Josephine and her work, we provide these comments, and we look forward to seeing MECP staff and the Minister including changes derived from our comments into Ontario's *Endangered Species Act* and related regulations.

First Nations Signatories Providing These Comments:

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² e.g. the examples provided in the second bullet points on page 4, 1 and 3 bullet points on page 5, all bullets point example on page 7.

First Nations Signatories Providing These Comments (continued):

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Primary Comment: Legislative and Regulatory Requirements for First Nations Collaboration in Species at Risk Recovery and Protection

First and foremost, there is a need for true collaboration with First Nations regarding Ontario's Species at Risk protection and recovery efforts. True collaboration begins with meaningful communication, notification, consultation, and leads to joint planning and work to protect Species at Risk and related habitat. Currently there are no legislative or regulatory requirements for such collaboration or engagement to occur in Ontario: a major deficit in protection for species at risk given the fact that First Nations peoples have been caring for the wellbeing all species from time immemorial, have unique knowledge of the habitat and characteristics of species at risk, and have a high abundance of species at risk within Traditional Territories.

Ontario's Species at Risk recovery and protection legislation must include legislative and regulatory requirements for Ontario agency staff to directly engage and collaborate with First Nations in recovery and protection programs. Such legal requirements are best co-developed between regulators and First Nations. Failure to take this initial step could lead, at best, to weak integration of Indigenous knowledge and perspectives, and at worst, to a continual decline in Species at Risk through missed opportunities for implementing joint Ontario-Indigenous recovery efforts. This is made clear in a recent study conducted by Hill, Schuster, and Bennett in 2019³ where the authors found that despite federal legal requirements, the Government of Canada is repeatedly missing opportunities to improve the status of listed species at risk by failing to co-ordinate recovery efforts with Indigenous partners, or accessing traditional knowledge that could aid in the understanding of species' traditional ranges and current status.

³ Cassandra J.Hill, Richard Schuster, and Joseph Bennett, 2019. Indigenous involvement in the Canadian species at risk recovery process. *Environmental Science & Policy*. Volume 94, April 2019, Pages 220-226.
<https://www.sciencedirect.com/science/article/pii/S1462901118310906>

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Our experiences with Ontario mirror what Hill, Schuster, and Bennett found with federal government Species at Risk programs.

The Province of Ontario needs to look to the Hill, Schuster, and Bennett study to learn from the findings, and do better at working with First Nations to develop a Made in Ontario Treaty Lands approach to Species at Risk recovery efforts and actions. In practice, we recommend the following set of mechanisms as methods to be included in legislation and regulations for improving the province's relationship with First Nations on SAR recovery efforts. Please note that this is not an exhaustive list and that decisions ought to be made in consultation with First Nation peoples. The mechanisms we recommend for consideration are:

- Significant, cross-Ontario Indigenous Knowledge Holder Membership on the Committee on the Status of Species at Risk in Ontario (COSSARO).
- Include a standing item on the meeting agendas of COSSARO and the Program Advisory Committee (PAC) regarding the inclusion of Traditional Ecological Knowledge (TEK).
- Develop guidance documents with First Nations peoples for:
 - how to effectively incorporate Indigenous knowledge in Species at Risk protection and recovery;
 - how to assess, evaluate and provide inclusive consideration for species considered to be at risk by First Nations people due in relation to food security, harvesting, teaching, medicine and spiritual needs; and
 - how to collaborate effectively with Indigenous Guardians on Species at Risk monitoring, protection, and recovery.
- Adapt the structure of species recovery teams to create a team dedicated to Traditional Ecological Knowledge integration AND move to have Traditional Knowledge holder representatives on all species recovery teams.
- When developing or updating species recovery strategies and government response statements include a First Nation engagement and collaboration component that includes travelling to communities to learn and transfer species at risk knowledge allowing the *braiding* of Indigenous and western science.
- As part of the development, updating, and/or evaluating the success of a species recovery strategy and government response statements, include conducting Species at Risk inventories for those species on First Nation traditional territories, including reserve lands. This should be done in full collaboration with First Nations and include the involvement of local Indigenous monitors and/ or guardians.
- Continue to administer the Species at Risk Stewardship Fund (SARSF), especially to support Indigenous-led Species at Risk recovery efforts, which also generates the added benefit of local employment and capacity building within First Nations across the province of Ontario.

Area of Focus 1: Landscape Approaches

A landscape-level approach could better integrate Indigenous worldviews into the Endangered Species Act and harmonize with existing federal processes, if it were implemented in tandem with single-species approaches.

It is not a coincidence that you often find concentrations of Species at Risk on First Nation surveyed reserve lands and traditional territory lands managed by First Nations across Ontario. First Nation peoples have roles and responsibilities to manage the land base within the surveyed reserve lands, and traditional territories. Doing so upholds our rights to the continued existence of all species and habitats.

Populations of Species at Risk in Ontario have continued to decline over the past decade. A landscape-level approach will protect multiple species will provide a more effective way to reach Ontario's conservation targets, with the result of more effectively preserving habitats and species that are of significance to Indigenous peoples in Ontario. For instance, protecting habitats on a landscape-scale will benefit Species at Risk across traditional territories, and non-listed species that are also important to First Nations, such as moose and deer.

Federal, provincial and territorial governments have agreed to a set of principles in the Pan-Canadian Approach to Transforming Species at Risk Conservation in Canada⁴ to guide collaborative work and to operationalize the transformation to multi-species and ecosystem-based approaches, building on existing collaboration through the Accord for the Protection of Species at Risk⁵, and federal-provincial/territorial bilateral agreements on species at risk conservation. Through the Accord, Ontario has made a commitment to ensure multi-jurisdictional cooperation for the protection of species through the development and implementation of recovery plans, and we understand this multi-jurisdictional cooperation must include First Nations.

The eight guiding principles in the Pan-Canadian Approach to Transforming Species at Risk Conservation in Canada include, "Principle 4: Indigenous Engagement:

- Planning and implementation approaches will aim to renew relationships and strengthen collaboration between our governments and Indigenous peoples, by:
 - Recognizing and respecting the role of Indigenous peoples in the conservation of species at risk and biodiversity more broadly;
 - Increasing capacity for Indigenous-led community stewardship planning and action; and
 - Co-developing stewardship agreements.

⁴ Pan-Canadian Approach to Transforming Species at Risk Conservation in Canada, 2018.

<https://www.canada.ca/content/dam/eccc/documents/pdf/species-risk/pan-canadian-approach-transforming-species-risk-conservation-canada.pdf>

⁵ Federal, Provincial and Territorial Accord for the Protection of Species at Risk, 2014. <https://www.canada.ca/en/environment-climate-change/services/species-risk-act-accord-funding/protection-federal-provincial-territorial-accord.html>

Harmonizing the Federal, Provincial, *and* Indigenous approaches for protecting species and habitats will leverage the benefits of joint planning and implementation, maximize the ability to protect and recover species at risk.

We stress that a landscape-level approach could better integrate Indigenous worldviews into the Endangered Species Act and harmonize with existing federal processes, if it were implemented in tandem with single-species approaches recognized by the in the Pan-Canadian Approach to Transforming Species at Risk Conservation in Canada, *and* if it avoids development approvals that impact species at risk with no oversight or consideration for species-specific habitat requirements, and lowering the standard of protection.

Area of Focus 2: Listing Process and Protection for Species at Risk

A) Improve the process of species listing by the Committee on the Status of Species at Risk in Ontario (COSSARO) by ensuring the incorporation of Traditional Ecological Knowledge (TEK) into western science-based decision-making in practice, not just on paper.

The *Endangered Species Act (2007)* c.6, s.5(3) states that “COSSARO shall classify species based on the best available scientific information, including information obtained from community knowledge and aboriginal traditional knowledge”, however there is no clear information on the mechanisms for retrieving, adequately considering, and incorporating aboriginal traditional knowledge (ATK) or traditional ecological knowledge (TEK) into the listing process. For example, none of COSSARO’s current members are identified as Indigenous or identified as experienced in braiding TEK with western science. Further, there is no formal COSSARO ATK subcommittee dedicated to addressing these shortcomings. Finally, Ontario has no publicly available written guidelines for incorporating ATK into the species assessment process. As recently shown by Hill, Schuster and Bennett (Ibid), there is a distinct lack of Indigenous involvement in species at risk legislation and decision-making at the federal level – and we know at the provincial level. First Nation involvement in species at risk legislation and decision-making at the provincial level will only improve through the provision of “clearer and more precise guidelines for the inclusion of Indigenous knowledge and perspectives [... and] transparency in the way Indigenous involvement is documented” (Ibid, p. 225).

We recommend that the Ministry of Environment, Conservation, and Parks (MECP) review the *Endangered Species Act* with the goal of improving the process of assessing and classifying species by providing more transparency on the retrieval, adequate consideration, and incorporation of ATK and TEK. This can be done using a number of strategies including, but not limited to:

- providing COSSARO membership spots to First Nations people or ATK and TEK holders, and adequate capacity funding to facilitate their participation;
- creating written guidelines on how ATK and TEK are retrieved, adequately considered, properly protected, and incorporated into braided science-based and Indigenous Knowledge based species assessments;

- establishing a formal COSSARO TEK subcommittee responsible for retrieving ATK and TEK and assisting western scientific experts with its inclusion in species assessments;
- ensuring there is a standing agenda item for discussion of ATK and TEK at all COSSARO meetings; and
- requiring COSSARO members (with western scientific expertise) to attend TEK learning sessions or workshops with knowledge holders.

B) *Make information on species listing as well as automatic species and habitat protections more accessible to, but not open for debate by, the public.*

In the “10th Year Review of Ontario’s *Endangered Species Act*: Discussion Paper”, the MECP attributes many of the asserted “challenges” associated with the Act to uncertainty, a lack of information, or lack of transparency. However, the Discussion Paper simultaneously suggests processes that would further muddy the waters. For example, revising the Act to allow for Ministerial discretion on whether or not to apply species or habitat protections (versus automatic provisions upon listing) would only contribute to a further lack of transparency and confidence in the process. To uphold the purpose and spirit of the *Endangered Species Act*, decision-making regarding the status of at-risk wildlife in Ontario (and their subsequent level of protection) should be left to an independent panel, whose members base decisions on evidence-based science and ATK/TEK, and a process that is straightforward and objective. Ontario should absolutely avoid a process where special interest lobbyists are given the opportunity to contest species listing and automatic protection, or to put political pressure on the Minister to do so.

Lack of transparency should not be used as an excuse to have special interest lobbyists assert undue political influence over a science and ATK based process. If there is a perceived lack of information or lack of transparency that is perceived to create barriers for the public or industry to pursue recreational or economic development pursuits in a way that respects and accounts for the *Endangered Species Act*, the MECP should explore ways to better **educate** those lacking understanding on species listing and automatic protection clauses so they may avoid harm to at-risk wildlife in their pursuits. This may include, but should not be limited to:

- Hiring more ministry staff, including First Nation staff, dedicated to responding to public inquiries about the *Endangered Species Act*; or
- Establishing more public-friendly interfaces (e.g. website, infographics, help telephone line or email address, etc.) to improve knowledge and understanding of the *Endangered Species Act*, including the approaches to braiding ATK/TEK with western science as we advocate here.

Area of Focus 3: Species Recovery Policies and Habitat Regulations

Species at Risk do require habitat protections and effective recovery activities do ensure the species can both survive and thrive for generations to come. Species recovery strategies, government response statements, and habitat regulations must be carried out in a way that promotes species protection, survival, and recovery. It is not about the timelines of the recovery strategy and government response statement, but rather ensuring these tools contain activities and mechanisms that truly enable SAR recovery.

The Discussion Paper rightfully points out that the development of Government Response Statements and Recovery Strategies, as well as the progress evaluations of these tools, are a sometimes time consuming and complex process. However, the main issue with these tools is not the timeline but rather **the ability for these tools to effectively deliver on species recovery outcomes**. A key component to ensuring effective delivery on recovery actions is a collaborative approach between the Government of Ontario, scientists, and First Nations peoples with knowledge of the species in question that leverages the unique knowledge, resources, and talents of all parties involved. This includes ensuring Indigenous ATK/TEK is included, and an inventory of the SAR in question is conducted on Indigenous lands, involving local Indigenous knowledge holders and leaders who are carrying out recovery efforts in those areas. The some of the complexity and much of the time involved in developing Government Response Statements can be eliminated once effective collaborative tables, with Government of Ontario, scientists, and First Nations peoples are established, resourced and supported through legislation and regulation.

The Discussion Paper states that the 9-month time limit is too short for the government to develop Government Response Statements, and that there is no option under the Act to extend this timeline when needed. This not correct. There is already a measure in the Act to extend this timeframe for complex species and impacts. For example, Ontario has continually extended its legal timeline for developing a Government Response Statement for the important and valued American eel for this reason. Using the Act to delay developing recovery strategies and Government Response Statements on principles that the species is complex, that additional engagement is required with businesses, Indigenous peoples, landowners and conservation groups etc. must not continue to be used as scapegoat technique.

In terms of habitat regulations, it is incredibly problematic that the Discussion Paper suggests that habitat regulations should not be warranted when said regulations impact the certainty of business interests. The purpose of habitat regulations is to protect Species at Risk habitat. It has been argued that these regulations are not necessary and could be replaced by key habitat descriptions. However, this argument has been made without an evaluation of the effectiveness of key habitat descriptions in lieu of habitat regulations. As a result, we recommend that habitat regulations continue to be a requirement until an evaluation of the effectiveness of key habitat descriptions has been conducted. In addition, we wish to note that development has the potential to occur within areas under habitat regulations: the key

is that the development is designed in a manner that avoids impacts to the Species at Risk within the habitat regulations. The above considerations together lead us to recommend that habitat regulations continue to serve as the mechanism for protecting Species at Risk, and that when development in these areas occurs the appropriate mitigation and impact reduction measures are taken, in collaboration with impacted Indigenous communities.

Area of Focus 4: Authorization Processes

A) While economic development is important and necessary in Ontario, the purpose of the Ontario Endangered Species Act is not to promote or ease economic development in Ontario but to protect and recover Species at Risk and ensure that authorized development activities do not negatively impact Species at Risk or their habitats.

The assessment, protection and recovery of Species at Risk in Ontario is a complex process that can take significant time and effort to successfully achieve. It is recognized that the process of authorization can be also complex, take time to complete, and conflict with the planned schedules of development projects. It is possible that an increase in government resources to review these applications could speed authorizations times. In addition, several exemptions have already been provided to specific industrial sectors and activities that have streamlined or reduced the complexity and time needed for the authorization process, generally at the expense of consideration for protection to Species at Risk and their habitats. It is possible that a more standardized authorization approach for routine development activities and or more commonly encountered Species at Risk could be employed, provided that these approaches are geared towards species protection and recovery.

Removal of duplication in legislation designed to protect and recover Species at Risk in Ontario would be a good practice to conserve resources, provided the purpose of protecting and recovering these species is met.

Collaborative opportunities with First Nations peoples in Ontario will be beneficial to the authorization process. The Ontario *Endangered Species Act* should include an obligation to consult with First Nation communities that may be impacted by an authorization, and proceeding with an authorization should not occur until this happens. In working with First Nations there may also be opportunities to work in harmony with federal agencies responsible for managing Species at Risk that may straddle First Nation reserve lands, and traditional territories found outside of provincial jurisdiction. In addition, we recommend Ontario explore Indigenous Guardians programs as a more strategic and collaborative enforcement mechanism that enhances both the level of participation of First Nations while protecting Species at Risk in more substantive manner rooted in Indigenous knowledge and reconciliation.

B) The ecological complexity needed to sustain Species at Risk in living ecosystems is married to First Nations' cultural relationships to place, and is largely incompatible with having businesses paying into a conservation fund dedicated to species at risk conservation, or allowing conservation banking to enable addressing requirements for species at risk prior to activities.

The Discussion Paper asks: “What new authorization tools could help businesses achieve benefits for species at risk? (e.g., in lieu of activity-based requirements enable paying into a conservation fund dedicated to species at risk conservation, or allow conservation banking to enable addressing requirements for species at risk prior to activities.)” Some answers to this question may lead to conservation banking where species/habitat losses and gains become assets that are bought and sold as market commodities.

The idea that ecosystem attributes can be identified and made interchangeable does not match our First Nation understanding of the ecological complexity needed to sustain all species, including Species at Risk in living, dynamic ecosystems attached to our cultural relations to place. Conservation banking does not work well with many of the certain uncertainties we have come to know and understand: the uncertainties of future rates of loss; the uncertainties of climate change; the uncertainties of invasive species; the uncertainties of ever increasing cumulative effects of generations of industrial development on species and ecosystems, and; the uncertainties of such changes in the context of the sensitivity of wildlife populations to various new development projects.

Some may claim that conservation banking or “offsetting” will be used only as a “last resort” within a mitigation hierarchy (where avoidance, minimizing adverse effects, and restoration must be considered first). Others may claim that conservation banking will improve areas beyond industrial development, areas that are not of interest to industry that might benefit from conservation activities. Environmental organizations will be keen to support conservation banking because it may improve their financial situations if they become part of the conservation banking system. But we are concerned that even the existence of conservation banking or offsets will lower the threshold for approving projects with significant effects, and the earlier stages of the mitigation hierarchy will simply be passed over if offsetting is better for industry and business.

Any move toward conservation banking by the Government of Ontario should only proceed with the Free, Prior and Informed Consent of First Nation rights-holders to ensure that the many issues we have with this approach, including governance, First Nation oversight, limits to offsetting, equivalence approaches to calculating offsets, and equitable distribution of costs and benefits among affected communities, are fully considered. We have recently seen the previous Ontario government’s approach to carbon offsetting, through which First Nations were virtually excluded from determining the methods for the approach, and virtually excluded from receiving any economic benefits. The current Ontario government recognized the myriad of issues with a banking approach to carbon offsetting (and hopefully understood those issues from the perspective of First Nations), and moved to quickly cancel the program. We urge the current Ontario government to reflect carefully on this experience before advancing down the path toward conservation banking.

Closing Remarks

As First Nations putting forward these comments, we fully expect to be continually engaged and informed in Species at Risk recovery efforts. More specifically, we expect the Province of Ontario to take progressive steps towards enhancing the involvement of Indigenous knowledge holders and land users through meaningful integration of TEK and collaboration with Indigenous guardians in SAR recovery efforts across the province, but especially within our Traditional Territories. Given the unique connection we have to our lands and waters, and the species that inhabit them, we are well positioned to collaborate with Ontario to enhance SAR recovery efforts.

We expect these comments will be thoughtfully considered and look forward to an ongoing dialogue on the involvement of First Nations peoples in Species at Risk protection and recovery efforts across Ontario.