



A2A

Algonquin to
Adirondacks
Collaborative

<http://www.a2acollaborative.org/>

A2A Endangered Species Act submission, May 2019

Re: ERO # 013-5033

The Algonquin to Adirondack Collaborative is an environmental charity which works to protect wildlife and to maintain habitat connectivity for wildlife through the broad region from Algonquin Park in Ontario to the Adirondack Park in New York State. We have over 50 partner organizations and 200 members which we collaborate with throughout the A2A corridor. We envision an Algonquin to Adirondacks region that is a resilient, with an ecologically connected landscape, which sustains a full range of native wildlife for now and for future generations of the people who live here. A critical component of this vision is protecting our most endangered species at risk based on objective scientific evidence and respect for wildlife.

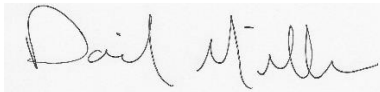
As an organization which focusses on protecting habitats and species in this critical biological corridor, we are greatly alarmed by the proposed changes to the Endangered Species Act, 2007. In particular:

- The Act and its protective provisions under the proposed changes would become much more discretionary rather than science based. The ability of the Minister to second guess recommendations of the Committee on the Status of Species at Risk in Ontario (COSSARO), and delay listings based on social or economic considerations compromises the science-based approach. This is unacceptable in a world where a million species could become extinct in the near future.
- Numerous changes are aimed at delaying possible listing and implementation, time which can make the difference between effective protection of species and significant species and habitat loss. The 3 year delay for economic and social considerations, the one year extension for review of COSSARO recommendations, the one year delay for application of protective provisions for existing permit holders, provisions allowing for indefinite delay of Government Response Statements to Recover Strategies, and the Ministerial discretion proposed for carrying out a review of progress (rather than the current 5 year requirement) all point to loss of protection and a movement away for an objective, science-based approach to endangered species. This is also unacceptable in a world where a million species could become extinct in the near future.
- Provisions that limit the geographic extent of assessments – in particular the requirement that COSSARO assessments be based not on the status of species in Ontario, but on status across a “biologically relevant range” – ignores the importance of transitional areas at the edge of ranges. A2A represent a significant and rich biological area in part because it is a transitional zone between northern and southern species. If an extended range is applied to the assessment of species, significant protection could be lost in the A2A area and a key factor in adjusting to climate change (the protection of species as they adjust to changes climate zones) will

threatened. These provisions would make much of the work A2A and other conservation organizations do ineffective, and should be struck from any new legislation.

- Recommended changes that make it easier to obtain permits for harmful activities also threaten the integrity and purpose of the Act. Such measures as providing a fee-in-lieu of protection option, removal of the requirement for the Minister to consult independent experts prior to issuing permits that are deemed to provide social or economic benefits, creation of landscape agreements for multiple harmful activities throughout an area, and removal of protections for individual members of a species, all limit the ability to ensure that permits do not result in the incremental loss species by providing a much broader scope, both geographic and political, for the issuing of harmful activity permits. At this critical time for wildlife, Ontario should be taking a lead in saving species, not allowing them to be harmed.

In conclusion, the Algonquin to Adirondacks Collaborative is greatly alarmed by all of the changes outlined above. We foresee significant negative impacts in the A2A region, which is home to a high number of species at risk. Preserving connected wildlife habitat is key to protecting the A2A region, a significant biological corridor in a transitional area, that is still relatively intact. We strongly urge the Ontario Government to withdraw these proposals and undertake further work to ensure an effective and science-based approach to protection of our endangered and threatened species.

A handwritten signature in black ink, appearing to read "David Miller", is centered on a light gray rectangular background.

David Miller

Executive Director, A2A, on behalf of the A2A Board of Directors

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