

November 10, 2025

Public Input Coordinator – Species at Risk Protection
Ministry of the Environment, Conservation and Parks
Species at Risk Branch
40 St Clair Ave West
Toronto, ON M4V 1M2

To Whom It May Concern

Re: OPPI Feedback on ERO 025-0908: Developing guidance on section 16 activities under the Species Conservation Act, 2025 and ERO 025-0909: Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of the Environment, Conservation & Parks (MECP) request for comments on the above ERO postings.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, developers, municipal governments and within the Ontario Public Service, other community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario—in communities ranging in size from small to large.

ERO 025-0908

In this posting, the Ministry is seeking feedback on information that would be helpful in developing a Guidance Document on section 16 activities under the new *Species Conservation Act, 2025*. OPPI has the following two points for your consideration.

- Technical guidance will need to include descriptions of the extent of habitat that is protected by the Act, and how those limits are determined or defined. Guidance will need to include a definition and description of “the area immediately around a dwelling place described in subclause (i) that is essential for the purposes set out in that subclause.”
- Clarity will be required on how habitats can be confirmed for animals whose ‘dwelling-place’ is often hidden, such as nesting sites for Blandings turtles.

ERO 025-0909

In this posting, the Ministry is seeking input into five new proposed regulations to implement the new *Species Conservation Act, 2025*. It is also looking to facilitate a registration-first approach while maintaining strong environmental safeguards. OPPI has the following comments for your consideration.

- Species that are proposed to be excluded from this legislation because they are federally protected could have unintended consequences. The province should prioritize the management of all protected species in Ontario.
- Exclusion of “special economic zones” should be struck. Protected species should be managed in concert with economic priorities.
- In preparing exception / registration / permitting regulations it is important to underscore the importance of a healthy and biologically diverse natural environment in the municipality and the benefit to its residents. If the result is unbalanced growth there may be adverse impacts to present and future generations.
- Many species at risk are culturally significant to First Nations communities. If there are fewer protections afforded to these species by provincial legislation, First Nations may expect more to be done to address aboriginal and treaty rights and protections for these species through individual development approvals. This could impact trust, time, and certainty for proponents, and there could be further impacts if the province limits municipal ability to address such matters through enhanced development standards.

Thank you for the opportunity to provide feedback on ERO 025-0908 and 0909. We would be pleased to meet with you to discuss our recommendations and/or to answer any questions. If you would like to schedule a meeting, please do not hesitate to contact me directly at 647-326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Susan Wiggins, CAE, Hon IDC
Executive Director