



Species at Risk Legislation Review
Ministry of Natural Resources
Species at Risk Unit

June 20, 2006

To Whom it May Concern:

Environment North supports conservation-first solutions for Northern environmental, and economic issues. We have functioned as a regional coalition of organizations and individual members since formation in 1972. Our areas of focus include the boreal forest, energy use and generation and conservation of various resources, including the conservation of Species at Risk that rely on Ontario's boreal forest. We have a strong belief that economic prosperity can be achieved in parallel with the maintenance of ecological integrity, in fact, the protection of our ecosystems is a prerequisite for community prosperity.

With our focus on Ontario's boreal forest, we have specific concerns for the survival of woodland caribou and wolverine populations in Ontario's north, and want to ensure that wide-ranging species are properly considered in the new legislation. Both species have lost more than half of their historical habitat, primarily in the past 50 years. The survival of these species relies on much more than simply protecting a single den or calving area. They require vast tracks of intact boreal forest, and are extremely sensitive to industrial development, particularly new road infrastructure. A combination of legislated protected areas and careful management of areas where resource extraction is occurring is essential to avoid the extirpation of these species from Ontario. We have the following suggestions in regard to the discussion paper on the proposed Species at Risk Legislation. We support the following proposed amendments:

- Establishing the Committee on the Status of Species at Risk in Ontario (COSSARO) as the official assessment body, with suggested list of requirements (the official list in Ontario should be based solely on the expert recommendations of COSSARO), this provision should be strengthened, by providing immediate protection for significant habitat that already has been identified in COSEWIC status reports or as part of recovery planning processes;
- Emergency listing (to include species on the official list of Species at Risk in Ontario (SARO) on an emergency basis), immediate protection to all Endangered, Threatened and Extirpated species on the official SARO list and their residence, while allowing for Ministerial discretion in exceptional cases;
- Emergency orders, with suggested list of conditions (to provide immediate protection for a Threatened, Endangered or Extirpated species or part of its habitat, by granting the minister the authority to restrict or prohibit activities that may affect it or by requiring actions to protect it);
- Recovery planning (including the identified timelines, the ecosystem-based approach, and the prescription of basic elements to be included in recovery strategies);
- Reporting (to prepare regular, public reports on species at risk and actions taken on their behalf);
- Strengthened enforcement and greater penalties.

Thank-you for the opportunity to provide input, we look forward to reviewing the draft legislation.

Sincerely,
Julee Boan
Environment North - Board of Directors