

November 11, 2025

Species at Risk Branch
Ministry of the Environment, Conservation and Parks
40 St. Clair Ave West
Toronto, ON M4V 1M2

Re: ERO 025-0909 – Proposed Legislative and Regulatory Amendments to Enable the Species Conservation Act, 2025

On behalf of the Federation of Ontario Cottagers' Associations (FOCA), directly representing the voice of 50,000 families and hundreds of community associations across rural and waterfront Ontario, we are pleased to provide comments on the proposed legislative and regulatory amendments under the *Species Conservation Act, 2025* (SCA).

FOCA's vision is to sustain and enhance the cottage experience for generations. Our mandate is to protect natural ecosystems, which directly sustain local economies, water quality, and quality of life. Our constituents represent a powerful economic force, owning over \$75 billion in real estate and spending \$8 billion annually on goods and services beyond their properties.

1. Commitment to Biodiversity and Environmental Protection

FOCA strongly urges the Government of Ontario to commit to fully implementing the **Ontario Biodiversity Strategy**, including providing the necessary resources for its targets and actions. The Strategy sets out the measures required to halt and reverse biodiversity decline across the province.

Key concerns:

- Allowing proponents to register activities that impact protected species, without thorough review, **removes the ability to ensure sustainable operations**.
- Discretionary exemptions in legislation risk prioritizing short-term development over long-term species protection and ecosystem health.

Recommendations:

- Ensure all legislative and regulatory amendments explicitly support the objectives of the Ontario Biodiversity Strategy.
- Require that any activity impacting species or habitat demonstrates avoidance, mitigation, or offsetting measures aligned with biodiversity targets.
- Maintain provincial Species at Risk listings and associated habitat protections as enforceable minimum standards.

2. Habitat Definition and Protection

FOCA emphasizes that habitat protection is critical to species survival, particularly in Ontario's lakes, rivers, wetlands, and shoreline ecosystems.

Key concerns:

- Current amendments may weaken habitat protections by leaving too much to discretion or by allowing registration without rigorous review.
- Habitat definitions must reflect ecological function, connectivity, and cumulative impacts, not only immediate physical boundaries.

Recommendations:

- Apply a **robust, evidence-based approach** to defining habitat, integrating scientific research and Indigenous knowledge.
- Require cumulative impact assessments for all activities that could affect species or habitats.
- Explicitly prohibit exemptions that compromise critical habitat or ecological integrity.

3. Listing and Regulatory Oversight

FOCA supports strong, transparent, and enforceable regulatory oversight.

Key concerns:

- Relying on discretionary powers for species listing or permitting allows inconsistent and potentially harmful decisions.
- Reduced oversight of registerable activities undermines the ability to monitor and enforce compliance with conservation objectives.

Recommendations:

- Reduce reliance on discretionary powers in both listing species and approving activities.
- Ensure **permit and registration processes include mandatory scientific review, public consultation, and Indigenous engagement**.
- Provide clear enforcement mechanisms, monitoring, and reporting requirements to ensure compliance and accountability.

4. Integration with Ontario Communities

FOCA emphasizes that Ontario's natural environment underpins local economies, property values, and community well-being. Legislative and regulatory amendments must reflect this interdependence.

Recommendations:

- Require that any regulatory framework explicitly balances sustainable development with long-term environmental protection.
- Incorporate clear accountability measures, including post-activity audits, to ensure ongoing compliance.
- Ensure transparency in all approvals, registrations, and exemptions to allow communities and stakeholders to participate meaningfully.

Summary:

FOCA urges the Government of Ontario to:

1. Fully implement the Ontario Biodiversity Strategy with appropriate resourcing.
2. Maintain and enforce provincial Species at Risk listings and habitat protections.
3. Apply robust, evidence-based habitat definitions that reflect ecological function and cumulative impacts.
4. Reduce reliance on discretionary powers and eliminate exemptions that weaken species or habitat protection.
5. Ensure the registration and permitting processes include scientific review, Indigenous knowledge, public consultation, transparency, and enforceable compliance mechanisms.

Protecting Ontario's natural environment is essential for sustaining communities, the economy, and biodiversity for future generations. FOCA looks forward to seeing these principles embedded in the final legislative and regulatory amendments.

Sincerely,



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FOCA is the Federation of Ontario Cottagers' Associations, the only go-to provincial advocacy organization committed to sustaining and enhancing the Ontario cottage experience. We work collaboratively to identify and address key issues by providing credible expertise, environmental stewardship, targeted programs and services, and a robust network of strategic partners.

Since 1963, FOCA has united Ontario's waterfront community. We are a non-profit membership organization representing over 550 lake, road, cottage, camp, and rural waterfront associations—together, 250,000 families and voters who steward 15,000 km of shoreline and 50 hectares of privately owned waterfront land from Kenora to Kingston, Lake Erie to north of Temagami. Our [2022 Economic Impact Study](#) confirmed that every 100 waterfront properties generate 63 jobs in Ontario, with 54 of those jobs in the community itself.

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