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**Chippewas of Rama First Nation comments on the 10-year review of the Endangered Species Act**

Hello. I am the Chippewas of Rama First Nation’s Community Consultation Worker.  We have numerous concerns regarding the 10-Year Review of the Endangered Species Act. They are as followed:

**Area of Focus 1 – Landscape Approaches**

Species that have been listed under Ontario's Endangered Species Act vary greatly. They are all unique and often need special consideration when it comes to habitat protection. It is nearly impossible to create a blanket landscape approach that would successfully protect all species listed under the act. If a landscape approach is to be utilized it should only be used in the beginning stages of species protection. Certain measures can be implemented using this approach to change the way a landscape is protected. However, as previously stated each species is unique, and often each one needs special consideration when it comes to protection. Change the way activities are done on a landscape approach but protect individual species with a case-by-case approach. Taking case-by-case protection away from individual species will not fix the act but hinder its ability to function.

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

The Endangered Species Act lists species automatically once they have been assessed as at risk. Species that are to be potentially listed are reviewed by a panel of experts. These experts have an understanding of these species and their current status in Ontario. The assessment process is rigorous; species are only listed if they are in dire need of protection.

Alerting the public that a species is going to be listed puts that species at a greater risk. Doing this, would allow businesses or individual people time to potentially eradicate that species, in order to avoid the implications that go along with having a species at risk on their property.

"High uncertainty" and "costly impacts" to businesses and the public should be of little concern. Human activity is the reason these species are being assessed in the first place. To ignore a threatened species because of cost impacts is ridiculous. If we continue to do whatever we want many species that need protection will be wiped from the earth. Businesses and the public need to adapt their activity approaches in a more environmentally appropriate way. It may be a burden but people need to be held accountable to the natural world in which we all rely.

**Area of Focus 3 – Species Recovery Policies and Habitat Regulations**

Allowing the Government nine months to create a Response Statement after a species is listed under the Endangered Species Act is reasonable. An unspecified extension to this timeline would allow the government to put species protection on a back burner, offering little protection to the species' that need it the most. A quick response is needed to ensure proper protection.

The requirement put on the Government to conduct a Review of Progress for a listed species within 5 years is also reasonable. Again species that are at risk are in dire need of protection. The review keeps the government accountable to the protection of species at risk.

The development of a habitat regulation is needed regardless of general habitat protections. General habitat is broad and often does not take all of a species needs in to consideration.

**Area of Focus 4 – Authorization Process**

While the authorization processes under the Endangered Species Act may create administrative burdens or delays, these processes are needed to ensure businesses and the public are approaching their activities in a responsible way. These processes ensure that businesses and the public do not do whatever they want without regard to their activities' impacts on the environment and to the species listed under the act.

The fact that businesses and the public can get authorizations at all should be good enough. The government should not make it easier to get authorizations since the proposed activities likely have detrimental impacts on Species at Risk and the environment at large. Businesses need to evaluate their activities and ask themselves if it is worth going through the processes to receive authorization.