



2 December 2022

The Honorable Steve Clark  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, Ontario  
M7A 2J3

Regarding:  
**ERO 019-6217 Proposed amendments to the Greenbelt Area boundary regulation**

Dear Minister Clark,

Birds Canada is a non-profit charity that aims to drive action to better understand, appreciate, and conserve birds in Canada. We are writing to express our significant concerns regarding the changes proposed under ERO 019-6217 of Bill 23 or the More Homes Built Faster Act, 2022. We believe the proposed changes will harm native Ontario wildlife species and their habitats and will undermine the province's commitments and accomplishments for biodiversity conservation and climate change mitigation and adaptation. We urge the Government of Ontario to provide cities, towns, and rural communities with a mix of ownership and rental housing types that meet the needs of all Ontarians **without** implementing the changes proposed in ERO 019-6217. *We strongly oppose all of the proposed changes under ERO 019-6217 for the reasons summarized below.*

ERO 019-6217 removes lands from the existing Greenbelt and opens them for development, and proposes a "swap" for lands in other areas within the Greater Toronto-Hamilton Area. Lands identified for protection within the existing Greenbelt were carefully chosen as part of a natural heritage and agricultural system. The process for identifying and protecting these lands involved extensive public consultation, and input from provincial and municipal planners, Government of Ontario staff (from multiple ministries), municipalities, developers, and farm and conservation groups. The process was open and fair and created certainty from a planning perspective for all. The intent of the planning process was to minimize land speculation, urban and suburban sprawl, protect vital farmland and natural features, as well as create livable communities with ample green space. Removal of the proposed lands from the Greenbelt will lead to the loss of important natural areas and systems, loss of high-quality farmland, and fuel land speculation and sprawl in an ongoing cycle. Birds Canada welcomes the addition of new lands to the Greenbelt, but we strongly oppose the concept of land swapping among regions because it is fundamentally inconsistent with the goals of the Plan and Act. The existing lands in the current Greenbelt are important for bird conservation, protection of natural features, and for ensuring clean air, fresh water, climate resiliency, flood control, biodiversity, and a reliable local food source (Aziz and Van Cappellen, 2019. Comparative valuation of potential and realized ecosystem services in southern Ontario, Canada. Environmental Science and Policy 100, 105–112). We urge the Government of Ontario to maintain the Greenbelt in its original form so it can achieve its stated purpose. The Government of Ontario should not remove (or "swap") land from the existing Greenbelt and it should not develop land within the existing Greenbelt as proposed in ERO 019-6217.

Birds Canada is extremely concerned that ERO 019-6217 moves Ontario backwards and not forwards with respect to housing, biodiversity conservation, climate change mitigation and adaptation, and the land-use planning process in general. We urge the Ontario Government to maintain or increase, not decrease, protections from development for existing Greenbelt lands and expand existing Greenbelt lands without the use of “swap” processes.

Thank you for the opportunity to provide feedback on ERO 019-6217.

Sincerely,



Laura Irvine  
Director, Ontario Programs



Douglas C. Tozer, PhD  
Director, Waterbirds and Wetlands

c.c. Gregor Beck, Senior Strategist