



DELIVERED VIA EMAIL

greenbeltconsultation@ontario.ca

November 28, 2022

Re: Proposed Amendments to the Greenbelt Plan
ERO Number 019-6216

Please accept this submission of AEL Advocacy in response to ERO Number 019-6216¹.

A. About AEL Advocacy

Animal Environmental Legal Advocacy (“AEL Advocacy”) is a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

B. Comments on the Proposed Amendments to the Greenbelt Plan

AEL Advocacy is strongly opposed to the Ministry of Municipal Affairs and Housing’s (“MMAH”) proposed changes to the Greenbelt Plan that would remove or redesignate 7,400 acres of land from the Greenbelt.

Ontario’s Greenbelt was created to protect the province’s most environmentally significant regions from development and ensure that critical ecosystems and habitats remained intact. The Greenbelt is home to 78 of over 200 provincially listed species at risk in Ontario, including the monarch butterfly, the red-headed woodpecker, the spotted turtle, and the lakeside daisy.² It includes unique ecosystems that provide irreplaceable wildlife habitat. For example, the Carolinian life zone “is home to some of the most threatened species in the country, many of which are at the northern limit of their range” including eastern fox snake.³ Its unique weather conditions “include warm temperatures, low rates of frost and plentiful rainfall, a combination that has resulted in one of the highest diversity of habitats and species per square inch in Canada.”⁴

The unique ecosystems that exist throughout the Greenbelt are incredibly sensitive to change. Losses of all or parts of these ecosystems will result in habitat

¹ <https://ero.ontario.ca/notice/019-6216>

² Ontario Nature, “Biodiversity in Ontario’s Greenbelt” (2011), online: https://ontarionature.org/wp-content/uploads/2017/10/REPORT-GB_Habitat-Dec2011.pdf at 5 [Ontario Nature].

³ Ontario Nature at 9.

⁴ Ontario Nature at 9.

fragmentation and affect their ability to provide the functions and resources necessary for many species to survive. AEL Advocacy submits it is vital to the ecological integrity of the Greenbelt that it remain intact, as a continuous and permanent land base.

AEL Advocacy further submits that, if approved, this proposal will set a dangerous precedent that more Greenbelt lands can be opened up for development in the future.⁵ This runs directly contrary to the vision of the Greenbelt Plan, which is to give “permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized.”⁶

C. Conclusion

Premier Doug Ford promised never to remove land from the Greenbelt for development purposes. **We urge MMAH to withdraw this proposal and follow through on that promise by protecting the Greenbelt from development.**

We welcome the opportunity to discuss the above comments and recommendations.

Sincerely,



Krystal-Anne Roussel
Co-Director & Counsel, AEL Advocacy

⁵ Ontario Greenbelt Alliance, Statement from Ontario Greenbelt Alliance Steering Committee regarding the Provincial Announcement to Remove Lands from the Greenbelt, online: <<https://www.greenbeltalliance.ca/resources/statement-from-ontario-greenbelt-alliance-steering-committee-regarding-the-provincial-announcement-to-remove-lands-from-the-greenbelt>>.

⁶ Greenbelt Plan, 2017, online: <<https://www.ontario.ca/document/greenbelt-plan-2017#section-2>>.