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Ministry of Municipal Affairs and Housing  
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Subject: **Environmental Registry Policy Proposal 019-6216,  
Proposed Amendments to the Greenbelt Plan**

For over 80 years, Ducks Unlimited Canada (DUC) has been Canada's leader in wetland conservation. Using sound science, DUC works with landowners, government, public agencies, Indigenous groups, and many partners to protect, enhance and restore wetlands and associated habitats. In Ontario alone, DUC has conserved more than one million acres of vital habitat that contributes to Ontario's critical natural infrastructure that supports resiliency against flooding, improved water quality, increased biodiversity, species at risk recovery, and access to healthy outdoor spaces for people.

DUC has reviewed the **Environmental Registry Policy Proposal 019-6216, *Proposed Amendments to the Greenbelt Plan*** and offers the following comments. These comments should also be considered by the Ministry of Municipal and Affairs and Housing in relation to **Environmental Registry Policy Proposal 019-6217 *Proposed Amendments to the Greenbelt Plan Area Boundary Regulation*** and **Environmental Registry Policy Proposal 019-6218 *Proposed Redesignation of Land Under the Oak Ridges Moraine Conservation Plan***.

DUC understands the government's commitment to help enable an increased supply of housing for Ontarians. Consistent with our input to the Province's *Housing Affordability Task Force*, DUC is generally supportive of some aspects of the *Action Plan 2022-2023*, particularly proposals that:

- encourage community intensification and reduce sprawl/greenfield development,
- make best use of existing provincial and municipal infrastructure,
- capitalize upon existing and future transit systems

DUC is concerned, however, about the proposal to remove or redesignate the 15 noted parcels of land from the Greenbelt Plan. Our concerns are three-fold.

- Many of the 15 parcels contain wetlands and other natural heritage features. Given the extent of loss of natural heritage features in the Greater Golden Horseshoe, the function of these remaining natural features and systems is vital to maintaining an ecologically healthy Lake Ontario,
- By proposing to remove and re-designate parcels of land from within the Greenbelt Plan, the government is signalling to Ontarians that the permanent protections afforded by the 2005 Greenbelt Plan are in question and can no longer be relied upon. We are concerned that this could lead to future land speculation, land use uncertainty, demands for other removals and land use planning conflict, and,

- The attached report *Protecting Greenbelt Wetlands: How Effective is Policy* concludes the Greenbelt and Oak Ridges Moraine Conservation plans play invaluable roles in helping to ensure the long-term protection of wetlands and related natural heritage systems. Due to a lack of comprehensive, legislated, protections for Ontario's wetlands, those wetlands that lie outside of the Greenbelt and Oak Ridges Moraine plans have far fewer safeguards and we see continued loss. We call attention to a survey of municipal planners in section 4.1 of the Report who asked, as far back as 2012, for the province to:

- **Provide better guidance on system-based planning**
- Develop new **technical guidelines for connectivity and natural heritage system planning**;
- Develop a consistent wetland definition for all agencies that delineate wetlands;
- **Ensure that the necessary data and mapping resources are available to planners**;
- Strengthen policies to address land-use activities that are still threatening wetlands,

Such requests are consistent with concerns DUC has pointed out in other recent ERO submissions including Changes to Conservation Authority Regulations and the proposal to update OWES. To undertake any proposed changes to regulatory process, evaluations or existing protections such as those offered by the Greenbelt Act with ***no comprehensive provincial wetland policy*** in place, and without having undertaken important work related to natural heritage planning policy and associated guidance documents, the ability of municipalities to undertake good planning is severely compromised.

While not as replacement for the 15 areas to be removed or redesignated from the Greenbelt Plan, DUC generally supports the proposed addition of the Paris/Galt Moraine lands to the Greenbelt, particularly given the uncertainty that Bill 23 and concurrent ERO policy proposal posting 019-6177 (Review of a Place to Grow and PPS) causes about the future of the Province's land use planning approach to natural heritage systems and wetland protection.

Finally, we note that any analysis of natural heritage features within the Greenbelt completed within the past decade have likely been undertaken in the context of Greenbelt plan protections, and not in anticipation of residential development. Noting the accelerated construction timing referenced in ERO policy proposal 019-6216, it is imperative the Province ensure municipalities have sufficient capacity and time to undertake the pre-requisite and critically important watershed, sub-watershed and natural heritage systems studies necessary to support climate-resilient communities.

DUC is committed to working with government, municipalities, conservation partners and other stakeholders to conserve our residual wetland base across the province of Ontario, and put more habitat back on the Ontario landscape, particularly in those areas of the province that are highly threatened and where we simply cannot afford to lose more than what has already been lost. In so doing, we are open to help find win-win policy solutions that help the province deliver on its housing supply priorities, while ensuring the stated Ontario government commitment to net positive outcomes for wetlands and other natural heritage features and reverse the decades long trend of natural heritage loss.

Thank you for your consideration. If there are any questions regarding this DUC submission, Ministry staff may feel free to contact me directly.

Yours truly,



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Copy: Pat Kehoe DUC Director of Conservation Programs, Jim Brennan, DUC National Policy Director  
 Attachment: *Protecting Greenbelt Wetlands: How Effective is Policy*