

February 6, 2013

Krista Adams
Ministry of Natural Resources
Policy Division - Species at Risk Branch, Permits and Agreements Section
300 Water Street, Floor 2
Peterborough ON K9J8M5
Via email: esa.permits.agreements@ontario.ca

Dear Ms. Adams:

SUPPORT FOR EBR POSTING #011-7696

The Northwestern Ontario Municipal Association represents the interests of 37 municipalities from Kenora and Rainy River in the west to Wawa and Hornepayne in the East.

We strongly support the transition measure for the forestry sector in EBR posting #011-7696 because it recognizes the need to provide certainty to a valuable renewable resource that employs over 200,000 hard working Ontarians in over 260 communities. It also recognizes that Ontario's forest sector already provides for the needs of species at risk through the Crown Forest Sustainability Act (CFSA) and that the forest sector is required to continuously update their management practices to be consistent with provincial recovery strategies developed under the Endangered Species Act (ESA).

"Ontario is a world leader in sustainable forest management. Less than one-half of 1% of Ontario's forests are harvested each year and by law plans to renew the forest must be in place prior to harvest and that planned renewal must occur. More than that, wood is renewable, reusable and recyclable." (MNR website, Ontario Wood, 2013)

We support the EBR posting #011-7696 for the following reasons:

1. To date, the ESA has resulted in unnecessary costs and the unnecessary loss of economic development. Government policy should be based on sustainable development and consider the socio- economic impact on hardworking families and the communities they call home.
2. It acknowledges that there are challenges/issues with the implementation of the ESA that need to be addressed and that a five year transition measure will provide the necessary time to improve the ESA's implementation.
3. Ontario's sustainable forest sector is a vital part of Ontario's green economy. In addition, Ontario's renewable forest sector already provides for the protection of species at risk and their habitat – a fact that the Ministry of Natural Resources has already recognized.



Our support requires that the regulation for the forest sector must:

- a) Last at least five years – this is the minimum amount of time necessary to provide the forest sector with certainty.
- b) Ensure that forest operations are approved under a Forest Management Plan developed under the Crown Forest Sustainability Act (CFSA). The CFSA already ensures the protection of species at risk and their habitat and requires that the forest sector continuously updates their management practices to be consistent with provincial recovery strategies.
- c) Create a panel, which will include elected municipal officials, to review the linkages between the ESA and the Crown Forest Sustainability Act.
- d) Not create any additional uncertainty for the forest sector. Any new surprises will create uncertainty.

We look forward to the adoption of this very important measure that will support the growth of our communities.

Sincerely,

A handwritten signature in black ink, appearing to be 'RN', with a long horizontal stroke extending to the right.

Ron Nelson
President
/cr

