



March 4, 2019,

The Honourable Doug Ford
Premier of Ontario
Legislative Building, Room 281
Queen's Park
Toronto, ON M7A 1A1

The Honourable John Yakabuski
Minister of Natural Resources and Forestry
Whitney Block 6th Floor, Room 6630
99 Wellesley Street West
Toronto, ON M7A 1W3

The Honourable Rod Phillips
Minister of Environment, Conservation and Parks
Ferguson Block 11th Floor
77 Wellesley Street West
Toronto, ON M7A 2T5

Re: Town of Hearst's Request for a Permanent Recognition of the CFSA as an Equivalent Process to ESA.

Premier Ford, Minister Phillips, and Minister Yakabuski,

On behalf of the Town of Hearst, thank you for the opportunity to comment on the *10th Year Review of Ontario's Endangered Species Act: Discussion Paper*, ERO number 013-4143. We look forward to working with your government to improve the effectiveness of the Endangered Species Act (ESA) and ensure a balanced approach between a healthy environment and a healthy economy.

The Town of Hearst has depended on forestry for almost a century. Due to the resiliency of its residents and forest operators, the Town was able to overcome economic cycles up to this day. Although the forest sector remains vulnerable to globalization and new market trends, the domestic political framework is becoming an even larger concern for this industry and forest-dependent towns like Hearst. For the past decade, the Town of Hearst's officials have expressed their concerns over the measures taken to protect the woodland caribou which, in our opinion, has not balanced current science, traditional indigenous knowledge and community interests.

The most important action the government should take is a permanent recognition of the Crown Forest Sustainability Act (CFSA) as an equivalent process to the Endangered Species Act (ESA); either through a perpetual Section 55 Regulation or legislative change to the ESA. The CFSA already provides landscape, stand, and site-level direction for managing, conserving, and protecting species at risk. Having two acts attempting to accomplish the same outcome represents the single greatest piece of red tape and duplication to the forest sector.

Once this essential first step has been accomplished, we must also ensure the following requirements be embedded in a new, modernized ESA:

1. Consideration of Climate Change on habitat in all species at risk policy to ensure that policy positions resources-based communities to continue to thrive in a changing climate of the future;
2. Cumulative impact of all species at risk policy on a healthy economy
3. Socio-economic impact analysis must be completed and shared with impacted stakeholders and First Nations prior to any species at risk policy being implemented

The forest sector will continue to operate under the CFSA which, by law, requires, forestry operations to follow an approved forest management plan. Guides delivered under the CFSA include operational prescriptions and conditions, which may include reserves, modified operations, or specific conditions on road use and construction in the area near a species at risk and their habitat.

Once a permanent Section 55 Regulation has been passed, or other legislative change made to the ESA recognizing equivalency between the two acts, more work must be done on species at risk policy currently being delivered under the CFSA. Overly precautionary prescriptions for habitat protection for woodland caribou, for example, results in what's causing over 42,00 square kms in our region that is not occupied by caribou to be governed by restrictive caribou measures.

It is our understanding that the Ministry of Natural Resources and Forestry (MNRF) is responsible for species at risk prescriptions currently being delivered under the CFSA. We seek that unworkable prescriptions, such as the caribou example provided above, will be addressed and improved regardless of any future changes made to the ESA.

The Town of Hearst truly believe in maintaining good relationships with First Nations. It is our opinion that the Government need to fulfill its duty to consult with First Nations relative to any developments that take place within our territory.

Further, we remain extremely concerned about role of the Federal Government and potential negotiations with Ontario on Conservation Agreements. For example, a MNRF socio-economic analysis determined that up to 2800 jobs could be lost and 8 mills could close as a result of the province meeting the federal disturbance thresholds for caribou. We believe that Ontario should consult with us well in advance of any draft and will not enter into a Conservation Agreement with the Federal Government that will result in lost jobs and lost opportunity.

In order to avoid catastrophic socio-economic impacts, we need permanent recognition that the CFSA is an equivalent process to the ESA, while developing workable species at risk policy.

We would be happy to meet with you at your earliest convenience to discuss the best path forward to ensuring positive outcomes for species at risk while keeping people in this province working.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger Sigouin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Roger Sigouin
Mayor

c.c. Minister Vic Fedeli, Ministry of Finance
Minister Greg Rickford, Ministry of Energy, Northern Development and Mines, Ministry of
Indigenous Affairs
MPP Ross Romano, Parliamentary Assistant to the Minister of Indigenous Affairs
Minister Todd Smith, Ministry of Economic Development, Job Creation and Trade
Giles Gherson, Deputy Minister of Red Tape and Regulatory Burden
Jamie Lim, President and CEO, OFIA