

Department of Development &  
Property



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January 17, 2020

Ministry of Natural Resources and Forestry  
70 Foster Drive  
Sault Ste. Marie ON P6A 6V5

Submitted Online Via the Environmental Registry of Ontario

**RE: Support for ERO# 019-1020, Proposed Changes to the Crown Forest Sustainability Act, 1994**

Dear Mr. Anthony:

The County of Renfrew thanks you for the opportunity to comment on the Proposed Changes to the *Crown Forest Sustainability Act* (CFSA), Environmental Registry of Ontario Number 019-1020. There are approximately 6,900 people in Renfrew County directly or indirectly employed by the forest sector, a significant number for this area with a total population of just over 100,000 and about 43,000 households. We are writing to you today on behalf of the County of Renfrew to express support for this proposal. We hope that this revision is approved in a timely and effective manner so that it may serve as a permanent resolution to the expiration of the Section 55 regulation of the *Endangered Species Act* (ESA) in 2020.

The CFSA 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 serious challenges to the forest sector in our area. While a permanent, legislative change to the CFSA is an essential and important first step; we hope to see continual improvement in forest management guidance (e.g. landscape guides and the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales) delivered under the CFSA, to fully realize the potential of the forest sector, while continuing to provide for the ecological sustainability of Ontario's forests.

We understand that MNRF is currently undertaking a review of forest management guidance and manuals and hope the finalized products will:

- Consider the impacts of climate change on species at risk habitat.
- Evaluate the cumulative impacts of species at risk policy on a healthy economy and other forest landscape goals.
- Contribute to functioning ecosystems and working landscapes.
- Undertake, share, and consider socio-economic impact analysis.

The proposed changes to the CFSA have the potential to significantly reduce administrative burden, costs, and business uncertainty while ensuring a continued commitment to the highest standards of sustainable forest management. We appreciate MNRF's efforts in working toward this solution and look forward to seeing the proposed changes take effect in a timely manner.

Sincerely,



Craig Kelley, CMO, Dipl.M.M., Ec. D  
Director of Development & Property



Lacey Rose, R.P.F.  
County Forester

c: Minister John Yakabuski, Ministry of Natural Resources and Forestry  
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks  
Jamie Lim, President & CEO, Ontario Forest Industries Association