



January 16, 2020

Re: Comment to EBR posting ERO #19-1020

Thank you for providing an opportunity to comment on the changes to the Crown Forest Sustainability Act. The CFSA has been the basis for conducting forest management in Ontario for the past several decades. Along with comprehensive science supported guides it provides the direction for carrying out forest management in Ontario. It makes sense that the CFSA be relied upon to provide direction on managing for species at risk. Forest activities have never been exempt from managing for species at risk under the CFSA but have had two acts that were not aligned.

This important change aligns the forest management for species at risk on the crown forests where it needs to be through the CFSA and through approved forest management plans written by professional foresters. This is an important step to stabilize the forest industry and confirms the path forward for forest management.

The recognition that the forest must be managed for all species under one set of guidance is key to a holistic ecosystem management approach. With this change, the Ontario government recognizes the existing guidance as appropriate to manage for species at risk (SAR) found in Crown forests and if necessary includes additional guidance during the scheduled guide reviews. In the meantime, it will be critical for government to undertake a robust legal review to ensure this change will withstand challenges if it has not already been done.

This change will provide a durable long-term solution that minimizes the risk of additional legal challenges and provide business certainty for the industry as well as the communities in which we operate.

This change demonstrates your commitment to ***develop a strategy to encourage economic growth within the forestry sector and promote the sector as open for business.*** (2019 Ontario Budget, Protecting What Matters Most, page 211)

Sincerely,

Janet Lane, RPF
SFL Leader