

January 12, 2020

Troy Anthony
Ministry of Natural Resources and Forestry
70 Foster Drive
Sault Ste. Marie, Ontario
P6A 6V5

Submitted Online Via the Environmental Registry of Ontario

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

Dear Mr. Anthony:

As an employee of Resolute Forest Products, thank you for the opportunity to comment on the *Proposed Changes to the Crown Forest Sustainability Act (CFSA)*, Environmental Registry of Ontario number 019-1020. At Resolute, our approach to sustainability is driven by the three pillars of sustainable development: environmental, social and economic. Ensuring the sustainability of the forests in our care and collaborating on forest management planning and innovation drive our approach to forestry.

With a regional economic impact of nearly half a billion dollars, annually, Resolute is not only a major contributor to the socio-economic well-being of Northwestern Ontario, but also a large employer and driver of economic growth and prosperity in the Province. Our pulp and paper mill, three (3) sawmills, wood pellet plant, bio-refinery and woodlands operations make us by far the largest forest products company operating in Ontario. We produce approximately 600,000 Megawatt hours of power every year, the majority from renewable biomass. Our close to 900 employees have an annual payroll of \$85 million, and 3,000 indirect jobs are associated with our operations.

I am writing to you today to express overwhelming support for proposal ERO# 019-1020. Given that the current regulation under the ESA expires this year, I ask that this proposal be approved and finalized as soon as possible. There can be no further delay on this item.

My support for these changes is contingent on the finalized language containing no additional conditions, restrictions, or requirements, beyond what is already contained within the CFSA or O. Reg. 242/08 under the Endangered Species Act (ESA). While removing this duplication is a critical and essential first step, species at risk prescriptions contained within existing forest management guidance continues to limit access to a renewable and sustainable supply of timber.

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 this sector. While a permanent, legislative change to the CFSA is an essential and important first step, in order to unleash the full potential of the sector, improvements need to be made to 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.

I understand that MNRF is currently undertaking a review of forest management guidance and manuals and expect the finalized products to:

1. Consider the impacts of climate change on species at risk habitat.

2. Evaluate the cumulative impacts of species at risk policy on a healthy economy.
3. Contribute to functioning ecosystems and working landscapes.
4. Undertake, share, and consider socio-economic impact analysis.

I look forward to working with your government to improve the effectiveness of species at risk policy and ensure a balanced approach between a healthy environment and vibrant economy. This change to the CFSA has the potential to significantly reduce administrative burden, costs, and business uncertainty, while ensuring a continued commitment to the highest standards of sustainable forest management.

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

Sincerely,



Dave Halushak

Resolute Forest Products – Thunder Bay Operations

CC Minister John Yakabuski, Ministry of Natural Resources and Forestry
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks