

**January 10, 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](https://ero.ontario.ca/notice/019-1020)

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

Dear Mr. Anthony:

I'm writing to you on behalf of my family business, the McRae Lumber Company. We have been in operation since 1885, and I am currently the 5th generation of my family to own and operate the business. We have been operating and harvesting from the same land-base in the Upper Ottawa Valley near Algonquin Park for the past 135 years. We currently employ roughly 70 people in our sawmills and have another 40 people working as contractors in the forestry operations. I'd like to think that our longevity has allowed us a certain insight into how forestry exists on the landscape. I'd also like to think that it demonstrates in factual terms how true sustainability is not a topical buzzword in the forest industry but an ethos by which we work and live by.

I would like to 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. I am writing to you today to express overwhelming support for this proposal. 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.

Since its implementation, I have had many concerns with the ESA but I believe the greatest problem with the Act is actually its inherent design and how that is enacted upon the landscape. The ESA is a species specific form of ecosystem management, and as a result it has trouble “seeing the forest for the trees”. All forest ecosystems are dynamic and complex environments that need to be managed by a high level landscape level plan. The CFSA does a much superior job of looking at the needs of the forest as an ecosystem and a collection of species. This broad-based approach allows for the greatest degree of compromise between the needs of different species. This ensures a balanced approach towards the variety of interests and needs that our modern forests require.

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 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 like to express my gratitude for the opportunity to comment and share my views regarding the ESA and CFSA. I believe that the government has started down the right path that, with determination and perseverance, should lead us to a world with a competitive forest industry, healthy forest ecosystems and prosperous Northern and Rural Ontario communities.

Sincerely,

Jamie McRae