



P.O. Box 867, New Liskeard, Ontario POJ 1PO

Ph. (705) 680-0033

January 20th, 2019

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

SUBJECT: Comment and Support for ERO# 019-1020

Dear Mr. Anthony,

Thank you for the opportunity to provide comments on ERO#019-1020. Timiskaming Forest Alliance Inc. (TFAI) and its shareholder companies (forest industry and First Nation shareholders) would like to thank you for the opportunity to comment on proposed changes to the CFSA. Also, TFAI has been involved in discussions related to Species at Risk (SAR) since its inception and have been achieving successful outcomes for species at risk for over two decades.

TFAI has been responsible for the successful forest management of approximately 1 million hectares in Northeastern Ontario for over 25 years. This submission represents TFAI's 25 years of experience and knowledge managing and conserving this renewal resource across a large landscape.

We would like to express our support for the proposed changes to the Crown Forest Sustainability Act (CFSA) and reaffirm our commitment, as stewards of Ontario's public forests, to the highest standards of sustainable forest management.

TFAI's 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 MNR 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 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 Northeastern Ontario working.

Sincerely,

TIMISKAMING FOREST ALLIANCE INC.



Yves Vivier, R.P.F.
General Manager of TFAI

cc

Minister John Yakabuški, Ministry of Natural Resources and Forestry
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks
Jamie Lim, President & CEO, Ontario Forest Industries Association
TFAI Board of Directors