**2020-01-15**

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

Dear Mr. Anthony:

I am Chief Forester for Haliburton Forest & Wildlife Reserve and Almaguin Forest Products. We are also associated with Timmins Forest & Wildlife Reserve. Together our companies own or manage over 260,000 ac of crown and private land in Central and Northern Ontario. We employ over 80 individuals and work with a large number of contractors to conduct sustainable forest management, operate our sawmills, and run a renowned tourism business. 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 my own and my companies support for this proposal. Given that the current regulation under the ESA expires this year, I ask that this proposal be approved and finalized. Further delay on this item would dramatically increase the burden on our operations without changing the outcomes.

My support for these changes is based 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).

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. Species at Risk are already heavily regulated and protected under the CFSA manuals, and there would be little to no benefit to species at risk from the duplication, and a considerable increase in burden, obstruction, and cost. This would have the additional negative consequence that Professional Foresters leaving landscape level Forest Management Plans - designed for the benefit of the broader forest and human community – poorly implemented, resulting in the balance of values being a risk.

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. We believe that 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. Ensure that habitat descriptions and guidance provide proven benefit to the values they protect.
2. Consider the impacts of climate change on species at risk habitat.
3. Evaluate the cumulative impacts of species at risk policy on a healthy economy.
4. Contribute to functioning ecosystems and working landscapes.
5. 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 this province working.

Sincerely,

**Thomas McCay, RPF**

**Chief Forester, Haliburton Forest & Wildlife Reserve**

**1095 Redkenn Rd, Dysart et al, ON**

CC 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