



October 27, 2021

The Honourable David Piccini
College Park 5th Floor,
777 Bay St,
Toronto, ON
M7A 2J3

Re: Minister's Order for temporary suspension of protection upon the listing of Black Ash under the Endangered Species Act

In response to the recent proposal from the ministry to suspend the protections for Black Ash in Ontario, we have the following questions and concerns to bring to your attention.

We understand the need to gather the evidence on socioeconomic implications of the proposed changes but are concerned that the Black Ash will continue to decline in number because of this postponement. Are there any protections and/or measures that could be afforded to provide some protection (i.e., require an ESA permit for removal) during the creation of the recovery strategy?

We also believe that protection of this species is crucial for the species recovery. According to the 2020 Evaluation Report for Black Ash from COSSARO 25% of the global range is in Ontario. Postponing the protection of the species under the ESA will negatively impact the species because there will be no limitations for removal of the species during the suspension.

Additionally, development of a Recovery Strategy while the protections are suspended does not prevent the species from being affected. We are concerned that not having the species protected will result in further loss and make for a more difficult recovery period.

Finally, with regards to the proposed amendment to the General Regulations under the ESA, we believe that each species should be individually assessed based on their COSSARO status. All species are variable and individual exemptions will vary based on each individual status. We fear that blanket approval of the existing conditional examples does not afford the species the necessary protection as determined by COSSARO.

We strongly oppose this proposal for the reasons listed above. We believe that protection of species such as the Black Ash is of utmost importance and will be in jeopardy if this proposal is enacted.

Thanks for your time and consideration,

A handwritten signature in black ink, appearing to read 'Michael Berry'.

Michael Berry
Ecological Stewardship Coordinator
Ruthven Park National Historic Site
Signed on behalf of the Lower Grand River Land Trust Inc.

CC Ron Gowland, President, Lower Grand River Land Trust Inc.