

February 15, 2019

The Honourable Rod Phillips
Minister of the Environment, Conservation and Parks
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto, ON
M7A 2T5

RE: Review of Ontario's Endangered Species Act

Dear Minister Phillips,

For more than a century, the Ontario Chamber of Commerce (OCC) has supported economic growth in Ontario by advocating for business priorities at Queen's Park on behalf of our diverse 60,000 members, including local chambers of commerce and boards of trades in over 135 communities.

Responsible natural resource management drives economic development in Northern and rural Ontario. The forest sector alone supports 170,000 jobs across more than 260 communities and generates \$15.5 billion in economic activity for this province. With only 0.2 percent of Ontario's Crown forests harvested each year, there is room for the sector to grow while remaining a world leader in sustainability.

Ontario's forest sector needs reliable and affordable access to wood fibre. The Government of Ontario's ongoing review of the *Endangered Species Act, 2007* (ESA) provides a critical window of opportunity to unlock the sector's economic potential. The following recommendations were developed in consultation with Ontario's business community.

- First, formally recognize equivalency between the *Crown Forest Sustainability Act* (CFSA) and the ESA to allow the forest sector to operate under a single act. Under the CFSA, industry is required to minimize landscape disturbances and adverse effects on plant and animal life. Duplication between the two acts creates unnecessary red tape. We encourage you to recognize equivalency through a legislative change or permanent regulation under Section 55 of the ESA. Coupled with reasonable and workable prescriptions, this is the best way to protect both the long-term health of Crown forests and the habitats of species at risk.
- Second, while working under the CFSA, ensure that all species at risk policies and prescriptions are subject to socioeconomic impact analyses and account for the impacts of

climate change. The results of those analyses should be communicated to relevant stakeholders, including Indigenous communities and businesses, prior to implementation of any policies or prescriptions.

- Finally, we are deeply concerned that the Government of Canada might intervene, either through an unworkable Section 11 Conservation Agreement under the *Species at Risk Act* or an Emergency Protection Order. Federal interference would infringe on provincial jurisdiction at a time when local stakeholders are engaging in productive efforts to find a solution. We therefore urge you to work with the forest industry and Indigenous communities to reach an agreement well before the federal government posts any draft Conservation Agreement to a public registry.

Thank you for the opportunity to comment on the ESA review. We look forward to continuing to work together to support evidence-based policies that support sustainable economic growth across Ontario.

Sincerely,



Rocco Rossi
President and CEO
Ontario Chamber of Commerce

cc:

Serge Imbrogno, Deputy Minister, Ministry of the Environment, Conservation and Parks
Rick Roth, Chief of Staff, Ministry of the Environment, Conservation and Parks
Andrea Khanjin, Parliamentary Assistant to the Minister of the Environment, Conservation and Parks
Hon. John Yakabuski, Minister, Ministry of Natural Resources and Forestry
Luca Bucci, Chief of Staff, Ministry of Natural Resources and Forestry