



February 22, 2019

Public Input Coordinator  
Species Conservation Policy Branch  
300 Water Street, Floor 5N  
Peterborough ON K9J 3C7

RE: EBR Registry #013-4143

EACOM Timber Corporation welcomes the *10<sup>th</sup> Year Review of Ontario's Endangered Species Act: Discussion Paper*, and I am pleased to submit comments on behalf of the Company.

Since 1994, the *Crown Forest Sustainability Act (CFSA)* has governed forestry in this province to 'provide for the sustainability of the Crown forests,' consistent with 'large, healthy, diverse and productive Crown forests and their associated ecological processes and biological diversity'. The CFSA establishes a robust framework with inventories, planning, monitoring, compliance and auditing. Ontario's forest management system offers a solid and comprehensive statutory, regulatory and policy guidance framework for species at risk (SAR).

At first glance, the ESA and the CFSA appear to have similar conservation objectives. Yet, since its introduction a decade ago, the ESA has proven challenging to implement and particularly so in a forest management context. The Committee on the Status of Species at Risk in Ontario's often arbitrary listings trigger reactive, siloed single-species processes that ignore an existing CFSA framework designed to achieve comprehensive sustainability objectives. This has created significant administrative burden with little to no added value for SAR.

Following years of attempts at harmonization, we offer that the path forward is to recognize Forest Management Plans (FMPs) within the ESA and work to implement SAR guidance through the CFSA. Of Ontario's 243 listed SAR, EACOM is responsible for the planning of prescriptions for 9 species, most of which are SAR birds. As we already plan actions to protect the species and their habitats through forestry activities, EACOM requests the opportunity to work with the ministry to develop appropriate actions that achieve conservation results for all these species through our FMPs.

We applaud the government's efforts to improve SAR guidance in Ontario through this review.

Thank you for the opportunity to participate in this consultation.

A handwritten signature in blue ink, appearing to read 'C. Leduc', is written over a large, faint circular watermark that resembles a tree ring pattern.

**Christine Leduc**  
Director, Public Affairs

Cc Minister Phillips, Ministry of Environment, Conservation & Parks  
Minister Yakubuski, Ministry of Natural Resources & Forestry