



March 4, 2019

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


RE: 10th Year Review of Ontario's Endangered Species Act: Discussion Paper – ERO#013-4143

AV Terrace Bay considers itself fortunate to operate in northern Ontario where we directly employ some 750 staff and contractors between our NBSK pulp facility and associated fibre supply operations. Although AVTB does not have direct management tenure on Crown forest land in Ontario, we directly operate within an area comprising of more than 5.3 million hectares. Across this area, AVTB is a significant and active partner, working with forest managers towards the development and implementation of sustainable forest management plans.

AVTB considers it of utmost importance to ensure that our operations, and those of our partners, are not only consistent with Ontario's comprehensive forest policy but are conducted in a manner that ensures long-term sustainability and biological diversity. For 25 years, responsible forest companies such as ours have struck the balance between the three pillars of sustainability (social, economic and environmental) while meeting all requirements of the Crown Forest Sustainability Act (CFSA) and the very comprehensive, transparent and knowledge-based forest management framework it employs. Forest management plans are developed with the input of local Aboriginal groups, professional foresters, biologists, ecologists, trappers, resource tourism operators and others who live in and live on the landbases these plans serve. These multi-disciplinary forest management planning teams are tasked with many obligations including the protection of all species of risk and their habitats. The CFSA required this prior to the introduction of the Endangered Species Act (ESA) and will continue to do so in the future.

For these reasons, AVTB suggests that approved forest management plans, prepared in a manner consistent with the requirements of the CFSA, be recognized as a management instrument within the ESA. With this recognition, effective and locally adaptive prescriptions can continue to be authored by teams of professionals, local resource experts and those with traditional ecological knowledge. This recognition of an existing process is an assured path towards the effective implementation of prescriptions that ensure the protection of all species at risk, their habitats and that the three pillars of sustainability remain responsibly balanced.

Thank you for the opportunity to comment and for your consideration.



Ryan Murphy, R.P.F.
Forest Resource Manager
AV Terrace Bay Inc.