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**January 20, 2020**

Troy Anthony  
Ministry of Natural Resources and Forestry  
70 Foster Drive  
Sault Ste. Marie, Ontario  
P6A 6V5

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

Dear Mr. Anthony:

As the Chief Forester of Resolute Forest Products I would like to 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. At Resolute we pride ourselves in sustainably managing over 5.5 million hectares in Northwestern Ontario. When we talk about sustainability we think about protecting species at risk with the appropriate regard to balancing environmental, social and economic considerations. When the habitat requirements of a species and its interactions with other species is not well understood, the harm to the ecosystem and the economic/social fabric can be devastating and sometimes irreversible.

Ontario's Crown Forest Sustainability Act (CFSA, 1994) is a world class framework that considers economic, social and environmental management objectives, including the protection of species at risk (SAR). The CFSA considers biodiversity values at coarse and fine scales, temporally and spatially. The CFSA requires substantial public and stakeholder consultation opportunities. It also requires that prescriptions, to ensure the protection of habitat, are established for all species to ensure a balanced approach to maintain and improve habitat across the landscape.

The Endangered Species Act (ESA, 2007) is specifically designed to protect individuals of species at risk and their habitat. The ESA does not consider overall biodiversity or the impacts of sustainable management for other species at risk on the landscape. The ESA also places individuals of species at risk requirements/management above socio-economic considerations. From its inception, the Ontario Government has granted several, time limited, Section 55 Rules and Regulation for forestry to continue to be managed under the CFSA but no permanent solution. These temporary solutions recognized that the CFSA already provided protection of species at risk and met the intended purpose of the ESA.

**I commend this government in finding a permanent solutions and thereby support this proposal.**

However I make the following comments; the changes to the CFSA should not come with conditions and the groups currently working on changes to manuals and acts be given all the resources necessary (including financial) to complete their tasks post haste.


The proposed permanent solution will provide a predictable regulatory environment for species at risk in Ontario's managed forests. This is a complex issue that needs to address biodiversity and balance the habitats for all species as well as the socioeconomic impacts. Resolute has been protecting wildlife and managing habitat for many decades. Our experience can contribute to the collective knowledge on finding a path forward.

With a regional economic impact of nearly half a billion dollars, annually, Resolute is not only a major contributor to the socio-economic well-being of Northwestern Ontario, but also a large employer and driver of economic growth and prosperity in the Province. Our pulp and paper mill, three (3) sawmills, wood pellet plant, bio-refinery and woodlands operations make us by far the largest forest products company operating in Ontario. We produce approximately 600,000 Megawatt hours of power every year, the majority from renewable biomass. Our close to 900 employees have an annual payroll of \$85 million, and 3,000 indirect jobs are associated with our operations.

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 vibrant 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 for ensuring positive outcomes with respect to species at risk, and for keeping people in this province working.

Yours sincerely,



Tom Ratz R.P.F.  
Forestry Manager & Chief Forester Ontario  
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CC Minister John Yakabuski, Ministry of Natural Resources and Forestry  
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks