



January 20, 2020

Mr. Troy Anthony,  
Supervisor, Crown Forests and Lands, Policy Branch  
Ministry of Natural Resources and Forestry  
70 Foster Drive  
Sault Ste. Marie, Ontario  
P6A 6V5

Submitted Online Via the [Environmental Registry of Ontario](#)

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

Dear Mr. Anthony:

I am writing to provide comments on behalf of Goulard Lumber on the proposed changes to the application of the Endangered Species Act (ESA) as it applies to forest management in Ontario.

Goulard Lumber operates a red and white pine sawmill in Sturgeon Falls. We employ approximately 45 people and we harvest on four Crown units in northeastern Ontario. We are very familiar with the protection of Species at Risk (SAR) through our forest operations, and we support your initiative to streamline approvals under the CFSA. We believe the Crown Forest Sustainability Act (CFSA) act has worked very well at ensuring the management, creation and protection of species at risk. That act also balances species protection with social and economic considerations in the province. Given that the current regulation under the ESA expires this year, I ask that this proposal be approved and finalized as soon as possible. There can be no further delay on this item.

Goulard's support for these changes is contingent on the finalized language containing no additional conditions, restrictions, or requirements, beyond what is already contained within the CFSA or O. Reg. 242/08 under the Endangered Species Act (ESA). While removing this duplication is a critical and essential first step, species at risk prescriptions contained within existing forest management guidance continues to limit access to a renewable and sustainable supply of timber. That remains a concern.

The CFSA already provides landscape, stand, and site-level direction for managing, conserving, and protecting species at risk. Having two acts attempting to accomplish the same outcome represents the single greatest piece of red tape and duplication to this sector. While a permanent, legislative change

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to the CFSA is an essential and important first step; in order to unleash the full potential of the sector, improvements need to be made to forest management guidance (e.g. landscape guides and the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales) delivered under the CFSA.

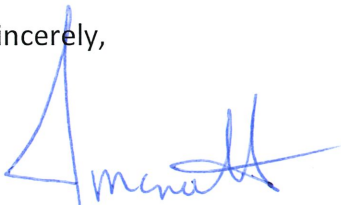
I understand that MNRF is currently undertaking a review of forest management guidance and manuals and expect the finalized products to:

1. Consider the impacts of climate change on species at risk habitat.
2. Evaluate the cumulative impacts of species at risk policy on a healthy economy.
3. Contribute to functioning ecosystems and working landscapes.
4. Undertake, share, and consider socio-economic impact analysis.

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 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 to ensuring positive outcomes for species at risk while keeping people in this province working.

Sincerely,



John McNutt, M. Sc. For., R.P.F.  
Woodlands Manager, Goulard Lumber (1971) Ltd.

CC Minister John Yakabuski, Ministry of Natural Resources and Forestry  
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks  
Jamie Lim, President & CEO, Ontario Forest Industries Association