



The Vermilion Forest Management Company Ltd.

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January 20th, 2019

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

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

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

Dear Mr. Anthony:

As the General Manager of the Vermilion Forest Management Company Ltd. (VFM), I 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.

VFM holds the Sustainable Forest License for the Sudbury Forest Management Unit in Ontario #542442, which directly employs 10 staff by assisting 11 Forest Resource License Holders meet their forest management obligations in the Sudbury area. We also work with over 15 contractors completing a range of silviculture, forest operations and monitoring activities on an annual basis.

I am writing to you today to express overwhelming support for this proposal. 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.

My 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.

A next step to properly protecting species at risk in Ontario is to strengthen the effectiveness of COSSARO as a resource to the government in determining which populations in fact require modification to forest management practices. On the Sudbury Forest, we are experiencing the abundance of several species listed in Ontario, and question whether a sound scientific approach has been used in determining risk status. Better use of data available, technical forest management specialism partnered with local knowledge of species and their patterns can bring accurate and reliable information forward to ensure the correct species are being considered in listing recommendations.

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 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,

A handwritten signature in black ink, appearing to read 'MLA', is positioned above the typed name and title.

Mark Lockhart, RPF

General Manager

The Vermilion Forest Management Company 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