



Timmins, November 5, 2021

Public Input Coordinator
Species at Risk Branch
300 Water Street
5th Floor, North tower
Peterborough, ON
K9J 8M5
Canada

Public Input Coordinator,

EACOM Timber Corporation has reviewed the Ministry of Environment, Conservation and Parks (MECP) policy proposal (ERO# 019-4278) *Minister's Order for temporary suspension of protection upon the listing of Black Ash under the Endangered Species Act*. I am pleased to submit comments on behalf of the Company.

With 6 manufacturing facilities in the Province, EACOM is a proud member of Ontario's forest sector. To support our operations, we are responsible for the management of 2 single entity Sustainable Forest Licences (SFLs) and involved in the management of 4 co-op SFLs in Northeastern Ontario.

EACOM did complete and submit the Black Ash survey in May 2021. Our input aligned with the need for time to develop a thoughtful and flexible recovery strategy based on the following:

- The widespread occurrence of the species across the boreal forest in northern Ontario; it is generally found in small isolated unmapped patches;
- Forest Management Plans contain *conditions for regular operations* as directed by the *Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales* for specific minimizing operational impact on the species when encountered during road construction, harvest, and silviculture operations;
- The *Forest Management Guide to Silviculture in the Great Lake-St. Lawrence and Boreal Forest* provides further direction for management of Black Ash;
- The recovery strategy should focus on building ecosystem resilience through active management of black ash stands that includes a range of actions; and
- The forest sector is well positioned as forest managers to contribute our expertise and experience towards an effective recovery strategy.

EACOM supports the proposal to make a regulation that would temporarily suspend protections for Black Ash afforded under the Endangered Species Act for a period of two



years from the time the species is added to the Species at Risk in Ontario list. We hope this period allows for more discussions and we remain available to assist the MECP in this regard.

Thank you for the opportunity to participate in this consultation.

A handwritten signature in black ink that reads "Jennifer Tallman".

Jennifer Tallman

Jennifer Tallman, R.P.F.
Chief Forester, Ontario