

February 28, 2022

Minister David Piccini
5th Floor
777 Bay Street
Toronto, ON
M7A 2J3

Minister Steven Guilbeault
Fontaine Building 12th floor
200 Sacré-Coeur Blvd
Gatineau QC K1A 0H3

RE: ERO Posting 019-4995, Conservation Agreement for Boreal Caribou in Ontario

Minister Piccini and Minister Guilbeault,

On behalf of the Ontario Forest Industries Association (OFIA) and its membership, I am writing to you today regarding ERO Posting 019-4995/(add the federal consultation), Conservation Agreement for Boreal Caribou in Ontario. We appreciate the work that both of your Ministries have put into consultation, and we look forward to more conversations to ensure a workable agreement for all parties.

Ontario's forest industry is committed to conserving boreal caribou, and we support a workable agreement that ensures the best outcome for the citizens of Ontario. However, the framework provided in the registry posting is not a finalized agreement. We ask that you consult with the forest industry, regulated professionals, directly impacted stakeholders, and Indigenous communities on the details of a finalized CA before signing. Working collaboratively with the Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNR), Ministry of Environment Conservation, and Parks (MECP), Indigenous Affairs Ontario (IAO) colleagues, and Environment Canada and Climate Change (ECCC), we ask that the parties address the topics outlined below.

Ultimately, Ontario and Canada are proposing a 5-year CA for one species. Over 230 species of plants and animals are considered at-risk in Ontario, and forest management planning takes place on 100-year plus horizons. Hypothetically, each species could have its own CA, renewed every 5-years, placing us on a continual treadmill of agreements and consultations. This is not sustainable and a clear failure of the federal *Species at Risk Act* (SARA). The SARA is broken legislation and should be modernized to respect provincial frameworks and constitutional authority over forest resources. Specifically, SARA must consider Ontario's species at risk legislative and policy framework an equivalent process.

Through signing and finalizing this CA for boreal caribou, Ontario and Canada are, in many respects, avoiding an actual solution. Through Ontario's Timber Class EA, the *Crown Forest Sustainability Act* (CFSA), its regulated manuals and guides, and commitment to active adaptive management, Ontario has already found its solution to managing species at risk while balancing other important societal values. This process needs to play out at a provincial level without federal meddling or intervention. If the SARA prevents this from occurring, it must be changed and modernized.

We ask to prioritize caribou range boundary re-delineation before implementing other conservation measures. Range boundaries are the foundation on which all caribou conservation measures are built. Undertaking habitat measures before re-delineating range boundaries will set the CA up for failure. The

boundary review must be completed before any other conservation actions are implemented, as it will dictate what each range's specific needs are.

We ask both parties to recognize that forest management must balance and consider all forest values, such as social, economic, and environmental impacts. While an important consideration, we do not believe Ontario's forests should be managed solely to support boreal caribou. One could read the ERO posting and come away with the impression that that is the entire purpose of our forests. Caribou are one of many species that make up complex ecosystems, and while they are an important consideration, they are not the only consideration. Boreal caribou conservation can only work in forests that are managed for these diverse values.

We ask that the CA provide more significant consideration for the impacts of a changing climate on boreal caribou habitat. Studies have found that under various climate change scenarios, only small, isolated pockets of Ontario's far north will support suitable caribou habitat, if any. Efforts should be prioritized in areas where suitable habitat has the highest chances of persistence in a changing climate, rather than potentially wasting resources creating habitat in the southern extent of administrative boundaries.

Finally, we ask that the parties clearly outline and demonstrate that the working forest landscape and wood supply to mills will not be impacted because of expanded parks or protected areas. We do not believe a causal link has been established in the scientific literature that would suggest more protected areas achieve better outcomes for caribou. Conversely, some areas of the province with extensive federal and provincial park networks are suffering some of the greatest losses of caribou habitat (e.g., catastrophic fires in Woodland Caribou Provincial Park), suggesting that more forest management, not less, is the more appropriate path forward.

Our members are looking to you and your governments to ensure that the final agreement addresses these concerns in collaboration with the forest industry. I look forward to meeting with your officials to discuss our concerns further and work towards a favourable outcome for boreal caribou and all Ontarians.

Sincerely,



Ian Dunn, R.P.F.
President & CEO
Ontario Forest Industries Association