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March 16, 2022

Public Input Coordinator
Landscape Species Recovery Section
Species at Risk Branch
Ministry of the Environment, Conservation and Parks
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Submitted via email. borealcaribouconservation@ontario.ca

Strategic Priorities Directorate
Canadian Wildlife Service
Environment and Climate Change Canada
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Submitted via email. ec.eccc-caribou.ec@canada.ca

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

At Resolute Forest Products, we pride ourselves in managing the forests sustainably and recognize the benefits not only to our business, but more broadly to all of society. We also recognize that in order to sustain a healthy business, we need to manage in a world of climate change, taking all values including species at risk into account and build this into our planning and management for the future.

Ontario has a world-class forest management regulatory framework. This has been confirmed through independent internationally recognized sustainable forest management certification standards such as SFI, CSA, and FSC. These forest management standards all include a requirement to protect species at risk. The validity of the approach for managing species at risk in Ontario, including woodland caribou has been assessed and validated. In Northwestern Ontario, strategies and prescriptions to protect caribou have been in place since the early 1990's. Dynamic Caribou Habitat Schedules (DCHS) has been in place in forest management plans for over 30 years. Data does not support caribou range retraction, and there is evidence that caribou are returning to previously harvested areas. The current ranges and the southern Caribou line need to be reviewed with all current science, including climate change, and refined using the knowledge of those working on the land. We are therefore supportive of the Section 11 Agreement's focus on getting this done. With the next round of Forest Management Plans approaching quickly the earlier in the 5-year period of this agreement this can be done the more likely that it can be incorporated seamlessly into the plans.

Resolute along with other stakeholders have pursued, with their own funding and that from ECCC, a project to determine the animal count on the Brightsand and Churchill ranges.

Currently the Brightsand range fecal DNA is complete, the project is waiting on funding for the Churchill range. This method of using fecal DNA appears to be a more cost effective method of determining animal counts. If the Section 11 can provide funding to assess more ranges and for at least two more times we could then know if in fact the caribou populations are increasing, decreasing or stable. This information can be collected using our current knowledge while simultaneously informing the refinement of the range boundaries.

In this era of post-truth politics, it is critical that science-based decision making be at the core of all decision making. In Ontario, many caribou ranges are currently above the 35% disturbance threshold but support high levels of recruitment (MNR State of the Woodland Caribou Resource Report Part 2 - 2014). The correlation between disturbance is extremely weak in Ontario and including data, substantially from Alberta, to manage a different landscape is not realistic. Recognizing that in Ontario disturbance is not the only factor that influences caribou recovery (e.g. nutrition, predation, hunting, climate change) is important which is why the 35/65 federal disturbance threshold in the preamble and implied elsewhere should be more of an avenue for discussion and research than a concrete indicator of health. We are supportive of Ontario's balanced approach to caribou management with disturbance being only a possible indicator of habitat health.

We appreciate that the proposal speaks to the importance of social and economic values. In the fire suppression regime that we have in Ontario the predictable effector of change that will ensure a constant, supply of habitat, both spatially and temporally is the forest industry. The fact that the proposal promotes protective areas is of great concern. Woodland Caribou Provincial park is a prime example of how letting nature renew the landscape can have dire effects on caribou habitat. In addition, Wabikimi is another example where the forest has been transitioning to more hardwoods due to fire suppression and not harvesting to renew the forest. Recognizing Other Effective Conservation Measures would be a positive step towards sustainable management of the ecosystems.

We should also recognize that we do not live in a caribou centric landscape and that there are other species (some of them SAR) and the entire ecosystem needs to be managed. Using the Section 11 to further a multispecies approach would benefit all species not one at the detriment to others.

At Resolute we support a workable agreement that ensures the best outcome for not only aribou but all species and the citizens of Ontario. Balanced decision-making, including an assessment of the social and economic impacts, should be the cornerstone of all public policy and legislation.

Yours sincerely,



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