

March 21, 2022

Landscape Species Recovery Section  
Species at Risk Branch  
Ministry of the Environment, Conservation and Parks  
435 James St. South, Ground Floor  
Thunder Bay, ON P7E 6T1  
[borealcaribouconservation@ontario.ca](mailto:borealcaribouconservation@ontario.ca)

Attention: Public Input Coordinator

**Re: ERO 019-4995 Conservation Agreement for Boreal Caribou Ontario**

Dear Public Input Coordinator,

As a proud member of Ontario's forestry sector, Interfor is pleased to provide comments to ERO posting 019-4995, *Conservation Agreement for Boreal Caribou Ontario*. Interfor supports a well-structured workable agreement developed in a provincial context that guides our collective actions to manage caribou recovery into the future.

Interfor supports a conservation agreement that reflects a balanced approach, and we therefore recommend the following:

- Provide a specific mechanism in the Appendix B: Conservations Measures to evaluate, monitor and report on the impacts to social and economic values related to caribou recovery measures.
- Recognize climate change by including it as a Principle in Section 3.0. Implementing conservation measures within the context of climate change is unavoidable as we continually evolve & adapt management of forest to support caribou populations.
- Complete the range boundary review in Year 1; the results of the review are critical to inform the implementation of many of the other conservation measures.
- Ensure the ability to have *nimble* adaptive management throughout the implementation of the conservation agreement. For example, the range scale approach to habitat restoration measures and protected areas initiative should reflect the final outcome of the range boundary review. It is important to ensure

that there is the opportunity for any new information to influence the conservation policies and approaches be retained as outlined in the draft conservation agreement.

- Any reference to the 65% undisturbed habitat threshold be qualified as "current" direction that is subject to change, based on new information, going forward.
- Include recognition of other effective area-based conservation measures (OECMs) as a tool in the protected areas initiative. Existing mechanisms to create parks and protected areas are inflexible and face jurisdictional challenges. OECMs offer a flexible, inexpensive, and pragmatic approach to confirm and quantify lands meeting biodiversity conservation objectives.
- Continue to engage & involve those that live and work in the caribou ranges - Indigenous communities, municipalities, and all other forest users on the implementation of the conservation measures.

When reviewing the submission, we were pleased to see the following:

- The inclusion of 7.1.2. commitment to collaborate with other jurisdictions such as Manitoba and Quebec, and we recommend this text be maintained in final version of the agreement.
- The reference to Ontario's existing and progressive regulatory framework and recommend it be maintained in the final version of the agreement.

In closing, thank you for MECP and MNDMNRF's time and effort representing Ontario in development of the conservation agreement (CA). We view an effective agreement as an excellent opportunity to bring coordinated focus, scientific review, local input and financial resources to achieve the mutual objectives of effective caribou conservation and growing and prosperous communities and forest sector in Ontario.

Should you have any questions or concerns, please contact us.

Respectfully,

**Interfor Corporation**



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

c.c. Hon. Greg Rickford, Minister of Northern Development, Mines, Natural Resources, and Forestry