



May 25, 2016

Hon. Kathleen Wynne
Premier
Minister of Intergovernmental Affairs
Legislative Building, Room 281, Queen's Park
Toronto, ON M7A 1A1
SENT VIA EMAIL:
premier@ontario.ca

Dear Premier Wynne,

The Federation of Northern Ontario Municipalities (FONOM) and the Northwestern Ontario Municipal Association (NOMA) are both deeply concerned with proposed revisions that would see language from the Endangered Species Act (ESA) inserted into the Forest Management Planning Manual (FMPM) which is part of the Crown Forest Sustainability Act (CFSA).

FONOM and NOMA met with Minister Mauro on May 13, 2016 to discuss the proposed revisions to the FMPM as well as the lack of consultation on the ESA component. In 2013, the government acknowledged the need to create a stakeholder panel to address the ESA. It is now 2016, and we have yet to see this panel created much less actually addressing the language around endangered species. While Minister Mauro is limited in his authority to authorize the creation of the panel, he did commit to working with the Ministry to determine the possibility of putting a group together to address the ESA language. Given that the timeline is short, Minister Mauro also committed to examining the possibility of having ESA language removed at this time and re-inserted into the FMPM prior to the January 1, 2018 deadline should the stakeholder panel and government not reach consensus.

We appreciate the efforts of Minister Mauro to address our concerns, however, we have heard repeatedly that final direction will come from your office. In recent comments made to the Timmins Daily Press, you recognized the importance of forestry to the province. However, allowing the ESA language to remain in the FMPM would send a strong signal otherwise to industry and many Northern communities that depend on a sustainable forestry sector.

While we acknowledge that MNRF must adopt revisions to the FMPM on July 1st to keep in line with the Declaration Order, we are concerned that the FMPM will go ahead as currently written. MNRF is not bound to the content within the revisions, only that they be adopted. Therefore, we ask that there is a complete removal of the ESA language from the revisions and immediately request that the stakeholder panel be created to conduct constructive discussions around the ESA. Furthermore, while the federal recovery strategy does set some direction to the provinces, it also acknowledges that a timeframe of 50 to 100 years is required to reverse ecological processes detrimental to caribou. Action plans, which are required under the federal Species at Risk Act (SARA) also require an evaluation of socio-economic costs and benefits to be derived from its implementation.

Madam Premier, you are well aware that our priority as Northerners' is to ensure we have a healthy and sustainable boreal forest. This is, after all, where we live, work and play. We believe it is imperative that our voices be heard and our concerns addressed.

We understand that we only have until the end of May to have the language removed before the FMPM moves through the legal process to meet the July 1 deadline. **Your immediate attention to this issue is critical.** Should you have any questions or concerns, we would welcome the opportunity to further discuss this at your convenience.

Sincerely,



Alan Spacek
FONOM President



David Canfield
NOMA President

cc: Ministry of Natural Resources and Forestry, Honourable Bill Mauro
Ministry of Natural Resources and Forestry, Chief of Staff, Brent McCurdy

attach: Letter to Minister Mauro, dated May 4, 2016



May 4, 2016

Hon. Bill Mauro
Ministry of Natural Resources and Forestry
Whitney Block, 6th Floor, Room 6630
99 Wellesley Street West
Toronto, ON M7A 1W3
SENT VIA EMAIL:
minister.mnrf@ontario.ca

Dear Minister Mauro,

RE: Request for Meeting during the FONOM/MMAH Northeastern Municipal Conference in Timmins

The Federation of Northern Ontario Municipalities (FONOM) and the Northwestern Ontario Municipal Association (NOMA) provided submissions to the Environmental Registry (No. 012-5973) in response to the *Proposed Revisions to the Forest Management Planning Manual for Crown Forests in Ontario, Forest Information Manual and Forest Operations and Silviculture Manual*.

The proposed revisions contain changes to the regulated Forest Management Planning Manual (FMPM) that demonstrates a significant shift in forestry policy direction at a time when the sector is recovering from a sustained economic downturn.

Revisions that include inserting the Endangered Species Act (ESA) language into the FMPM which is part of the Crown Forest Sustainability Act (CFSA) is concerning. These changes signal that the ESA will take primacy over the CFSA. This is indirect conflict with a 2007 commitment from the Ministry of Natural Resources that made these two acts equivalent. It was understood that the protection of an individual species at risk and its habitat at the expense of other forest management objectives would not be considered sustainable under the CFSA.

In 2013, the government made a commitment to establish a panel to review the linkages between the ESA and the CFSA with members from Aboriginal communities, the forest industry, municipalities, and environmental organizations. However, this panel has never been created.

It is important to note that there was a lack of consultation prior to the EBR being posted in regards to these significant changes. As important stakeholders, it is imperative that our communities be consulted to ensure that any proposed changes to the Forest Management Planning Manual (FMPM) will not negatively impact the forest sector and the northern and rural communities that rely on it.

Minister, we must ensure that this does not become another example of a change to legislation or regulation that will have unintended consequences on municipalities and the forest industry.

While we acknowledge that MNRF must adopt revisions to the FMPM on July 1st to keep in line with the Declaration Order, we are concerned that the revisions to the FMPM will go ahead as they are currently written. MNRF is not bound to the content within the revisions, only that they be adopted. Therefore, we ask that there is a complete removal of the ESA language from the revisions.

We respectfully request a meeting with you during the FONOM/MMAH Northeastern Municipal Conference in Timmins to discuss this further.

We look forward to hearing from you. Please do not hesitate to contact us should you have any questions.

Sincerely,



Alan Spacek
FONOM President



David Canfield
NOMA President

cc: Premier of Ontario, Honourable Kathleen Wynne
Ministry of Natural Resources and Forestry, Chief of Staff, Brent McCurdy