



February 7, 2018

Species Conservation Policy SAR & Bio Protection
PUBLIC INPUT COORDINATOR
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough Ontario
K9J 8M5

Re: EBR No. 013-1669 - *Amendments of Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) relating to forest operations in managed Crown forests, incorporating species recently listed to the Species at Risk in Ontario List, and safe harbour.*

The Federation of Northern Ontario Municipalities (FONOM) is pleased to have the opportunity to provide comments on the above noted regulatory amendment notice posted on the Environmental Bill of Rights Registry on January 19, 2018.

The forest industry is a vital sector in many communities across Northern Ontario. Not only does forestry support thousands of hardworking families, it also plays a positive role in addressing climate change. A healthy and well-managed forest has the potential to be one of the best tools to mitigate the adverse effects of climate change by sequestering carbon.

The notice proposes amending s. 22.1 of O. Reg. 242/08 to extend the current regulation by two years for forest operations in managed Crown forests. We continue to ask that the government implement a 5 year extension. We are concerned that a 2 year extension will not provide certainty and stability which is critical to ensuring that capital investments will be made, particularly given the ongoing softwood lumber dispute with the United States.

This is a complex policy issue that requires careful consideration. This past AMO Conference in Ottawa, the government recognized that they needed to have a better understanding of the impacts of climate change on habitat, the cumulative impacts of all the ESA policy on the sector/communities and ensure a socio-economic impact analysis is conducted.

FONOM

The Federation of Northern Ontario Municipalities

The government appears to be following through with their commitment to establish an independent stakeholder panel to review socio-economic impacts and provide advice on species at risk in Crown forest management. However, we feel it is important to highlight the need for the panel to be made up of those who have direct experience or will be directly impacted by any decision moving forward. This includes ensuring that community and traditional ecological knowledge from our Indigenous neighbours becomes a part of the discussion.

Finally, we ask that the government make a decision swiftly and avoid further uncertainty. We believe a deadline date of March 30, 2018 is both fair and reasonable.

We hope that you take our comments into careful consideration and look forward to future communications.