

February 5, 2020

Joe Maure
Forest Sector Strategy,
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 610
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Re: Draft Ontario Forest Sector Strategy (ERO Number: 019-0880)

Introduction

[BurlingtonGreen Environmental Association](#) is a citizen-led, nonpartisan, registered charity in the City of Burlington. We are pleased to submit our comments on the draft [Ontario Forest Sector Strategy](#). BurlingtonGreen regularly provides comments and recommendations to the government on issues pertaining to environmental protection and environmental policy. We believe that all levels of government must work to protect Canadians against the growing threat of our climate change and species extinction. Our concerns echo those raised by many partners and stakeholders in the environmental advocacy realm, including Ontario Nature and the David Suzuki Foundation, and the broader public.

Climate Change and Our Forests:

Climate change is the biggest challenge facing Ontarians. To achieve progress on climate action, climate change mitigation must drive all government decision-making. This calls for a complete transformation of the current decision-making framework, placing climate action as a top priority. A shift from the traditional framework to one that prioritizes our impact on the environment is necessary. A nested circle framework recognizes that social and economic activity occurs within ecological limits.

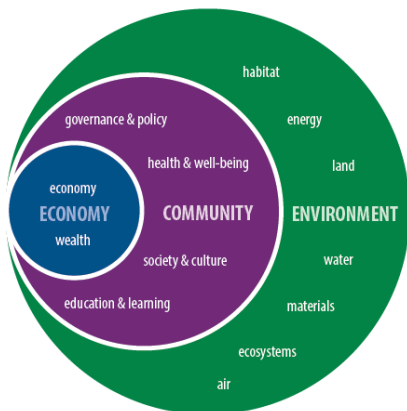


Photo credit: Future Oxford Community Sustainability Plan

BurlingtonGreen recognizes the economic contribution of the forest sector to the Province's economy. At the same time, we are facing new climate realities. The Intergovernmental Panel on Climate Change's (IPCC) most up to date recommendation is a 50% carbon reduction by 2030 and achieving carbon neutrality by no later than 2050. The draft Forest Sector Strategy is another example of how the Province prioritizes being "Open for Business" above the health of our habitats and species and the over-arching target of lowering our carbon emissions. Furthermore, in light of the fact that current logging licences are operating well below quotas (currently, most of the unharvested but available wood in Ontario is "committed" to license holders, and most of the license holders do not fully use the available wood – [on many forests less than 50% of the planned harvest is cut within a plan period](#)), it is unclear whether there is actually a business case to be made for any of the proposed changes. But more importantly, at no other time in history has it been more critical to recognize that short-term economic benefits, if they exist at all, will be far outweighed by the huge costs of climate change impact, which we are already seeing and which will intensify in the decades to come. Should we fail to meet our GHG emission commitments, we are just 10 years away from natural tipping points and runaway climate change. Now is not the time to loosen nor relax environmental checks and balances, on the contrary, governments need to amplify and enhance environmental protection measures.

The Threat to our Species and Habitats

A critical ecological issue we are currently facing is what scientists have termed a sixth mass extinction of plants and animals on Earth. But unlike past extinctions, this one is being caused by human activity. According to the [Centre for Biological Diversity](#), "as many as 30 to 50 percent of all species are possibly heading toward extinction by mid-century", and since "most of biodiversity's benefits take place at a local level, conserving local populations is the only way to ensure genetic diversity critical for a species' long-term survival". This means that wherever we are thinking of introducing human activity, such as logging, it is vital that a comprehensive environmental impact assessment be completed to determine whether any at-risk species are involved, before approval is given on a proposed project.

Now more than ever before, it is critical that we ensure the need of the forest sector for growth is governed within the parameters of responsible environmental stewardship in order to achieve a truly sustainable model for this sector. BurlingtonGreen, in agreement with Ontario Nature, contends that the draft Forest Sector Strategy aspires to double the amount of logging in the province from 15 million to 30 million cubic metres of wood per year, with no commitments to set aside more forests to support wildlife conservation¹. Current logging levels are already hampering opportunities for habitat protection. Scientists have directly linked excessive consumption of the world's resources to the climate crisis and are calling for increased protection and restoration of our ecosystems, including remaining primary forests. The strategy also overlooks the link between habitat fragmentation, which is too often the result of cutting through and across important wildlife transit and migratory routes by introducing new roads and intensive human and machine activity, and species decline. The way forward lies in [sharing the forest](#), and there's room for that.

The Need for Stronger and More Meaningful Public Consultation

In the face of the growing climate crisis, the government must engage in a robust and transparent consultation process with Ontarians to ensure that the public's priorities and feedback are heard and considered. The recent [Auditor General's Report](#) on the Environment highlighted the government's

¹ [Ontario Nature Petition](#)

shortcomings with regards to consulting the public on decisions with potential impacts on our environment². The report indicated that half of the proposal notices posted by the Natural Resources, Municipal Affairs, and Energy and Mines ministries in 2018/19 “did not adequately describe important aspects of the proposal, such as the environmental implications” (page 34). Furthermore, the initial ‘consultation’ process held to inform the development of the proposed Forest Sector Strategy consisted of roundtables which were not open to the public but were conducted on an invitation-only basis – a completely unacceptable method for gaining broad and unbiased input. The government’s approach, especially at a time that calls for all stakeholders to come together – government, industry and the public – on decisions that impact the health and survival of our habitats and species, flies in the face of the Auditor General’s recommendations and signals a disturbing trend on the part of the Government of Ontario.

Conclusion

We urge the Government of Ontario to put forward a sustainable, forward-looking strategy for managing our forests that carefully balances support for our industries and communities with improved, not weakened, conservation opportunities. We need a strategy that recognizes the threats facing our species and works to address them. It is time to acknowledge the need for and a commitment to a sustainable future for all, and a shift from a “Business as Usual” model that is unsustainable to a model that prioritizes action on climate and species preservation, thereby safeguarding the health and well being of our habitats and biosphere, now and for future generations.

Sincerely,

BurlingtonGreen Advocacy Team
BurlingtonGreen Environmental Association

CC: Jane McKenna, MPP, Burlington
John Yakabuski, Minister of Natural Resources and Forestry

² [Ontario Nature Blog](#)