

February 18, 2020

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Re: Discussion paper: Developing strategic direction for managing forest pests in Ontario: ERO 019-1005

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 *Discussion paper: Developing strategic direction for managing forest pests in Ontario*. 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.

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.

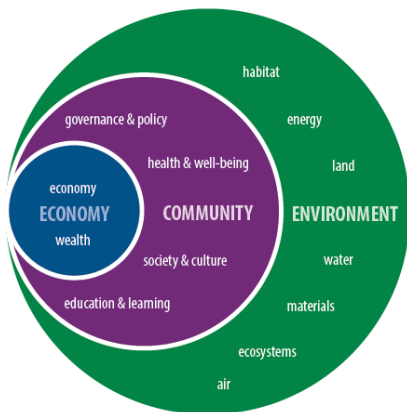


Photo credit: [Future Oxford Community Sustainability Plan](#)

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. This proposal 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. 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 sweep environmental checks and balances under the carpet.

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 Comments on the Discussion Paper on Improving Pest Management:

We welcome this opportunity to comment on the important task of improving Ontario’s ability to manage pests in our forests. As stated in the Province’s discussion paper, the advent of climate change and increased trade brings a higher risk for pest infestations and for the dissemination of new varieties of pests. We therefore fully support the idea of developing a strategic and proactive approach to pest management in view of these increased risk factors.

We agree with your objectives but would recommend adding one more: the preservation of a healthy and diverse indigenous tree canopy to mitigate pest destruction and climate change impacts.

We are also confused by the bullet point at the bottom of page 15, which reads: “Take no action in cases where a pest is likely to become established or intervention is not likely to be successful”. Why would we not take action if a pest is likely to become established? Some clarification on this would be helpful.

Discussion questions

1. How important is it to you that the province maintain an active role in forest pest management?

BurlingtonGreen believes it is very important that the province maintain an active role in forest pest management, particularly in light of increased threats by pests resulting from climate change.

2. What are the effects of forest pests that most concern you?

The following effects are most concerning: potential deforestation which will adversely affect Ontario’s tree canopy and carbon mitigation capacity; increased risk of forest fires due to dead/dying trees; negative effect on wildlife habitat, especially for endangered species.

3. What specific aspects of forest pest management would you like to see improved (e.g.,

prevention, detection, monitoring, risk assessment, response, research, communication)?

All aspects are important and interdependent. Monitoring and detection lead the way to effective risk assessment and response, while research will help to support more effective responses as well as prevention strategies. Effective communication among all stakeholders will be key to ensuring that information is quickly available to support rapid decision-making and appropriate risk management and response to pest infestations.

a. Please list the aspects you would like to see improved in order of priority.

It is very difficult to prioritize when all aspects are critical to effective pest management. At the same time, perhaps prevention is one of the most important aspects, since it will reduce the burden on resources and may help to eliminate some pests before management becomes too costly or difficult.

b. For each aspect you prioritized above, please describe the improvements that are needed.

Ensuring a diverse indigenous tree canopy will help to support pest prevention strategies. Forestry replanting needs to ensure appropriate species diversity so that pest infestation and propagation can be minimized. However, it is difficult to comment on what specific improvements are needed without current performance data as benchmarks. For example, how often are assessments conducted currently? Has this schedule resulted in any missed opportunities to identify and control pest infestations? Lacking this kind of information, it is difficult to offer an informed opinion on what aspects of pest management ought to be given higher priority in the future.

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 shortcomings with regards to consulting the public on decisions with potential impacts on our environment¹. 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).

It is therefore commendable that this opportunity to gain input through an initial Discussion Paper has been offered. While BurlingtonGreen is not in a position to comment with a high degree of specificity, we nevertheless support the initiative to identify potential improvements to pest management in Ontario's forests, and look forward to reviewing the results of the Discussion Paper process when they become available.

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. This must be coupled with carefully considered and appropriate improvements, where needed, to the legislation, policies and processes designed to support and implement a forest strategy.

¹ [Ontario Nature Blog](#)

We must ensure that the systems and resources designed to support our forest sector recognize the threats facing our species and work to address them. An updated and effective pest management strategy that takes into consideration the increased threat to our forests as a result of climate change and global trade impacts will be an important part of any forest strategy going forward. 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