

February 18, 2020

John Sullivan
Crown Forests and Lands Policy Branch
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Re: Proposed revisions to the Forest Manuals regulated under the Crown Forest Sustainability Act (ERO Number: 019-0715)

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 *Proposed Revisions to the Forest Manuals regulated under the Crown Forest Sustainability Act (ERO Number: 019-0715)*. 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.

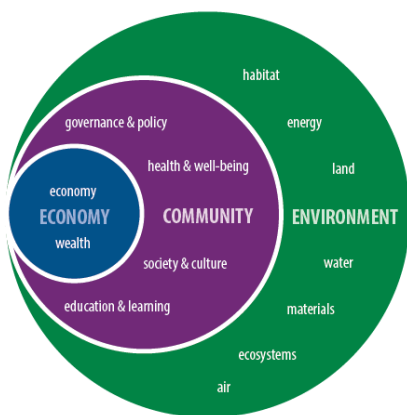


Photo credit: Future Oxford Community Sustainability Plan

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. 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 Position on Proposed Revisions to Forest Manuals:

BurlingtonGreen agrees with and supports the proposal to update planning requirements to better use modern technology, e.g. internet. But while we can see benefits to a more streamlined process for public and government review, we would not agree to an outright elimination of in-person information sessions, particularly in areas where broadband internet is not readily available or accessible, such as remote and rural communities which may be most affected by changes such as new logging roads etc. It will be important that consultation processes do not disadvantage those with little or no access to modern technology.

We are opposed to the amendment to remove the process for requiring an individual environmental assessment on specific planned forest operations in an approved Forest Plan. This removes an important check and balance to safeguard against new threats to endangered species and species diversity which may not have been identified when the Forest Plan was approved. This is particularly critical now that climate change is having an increasing impact and when more rapidly changing conditions are likely to require more environmental oversight, not less.

We also object to the removal of the requirement to post notices on the Environmental Registry at each consultation stage: this compromises transparency and opportunities for public awareness and input. And we vehemently oppose any removal of the 10-year limit for forest aggregate pits, on the grounds that the environmental impact of these operations on local species must be reviewed and curtailed to avoid species depopulation. As mentioned in our earlier [submission](#) on Aggregates, we believe there is no shortage of or unmet demand for aggregates in Ontario that cannot be met within parameters that also safeguard our environment, so we see no need to extend aggregate operations beyond their slated lifetime.

In the proposal, we found some areas unclear and vague, and request further detail and clarification, as follows:

- the proposal is vague about the level of flexibility there will be to carry over harvest areas from an approved Plan to a new Plan (“bridging operations”): what safeguards will be in place to avoid “rubber stamping” and to ensure that changing conditions and ecological factors are taken into account from one Plan to another, over time?
- species at risk – we are concerned about the reference to consistency with Bill 108 “More Homes More Choice” legislation, and the government’s record of attempting to remove environmental safeguards in the name of reducing ‘red tape’. Further, the references to “streamlining” the processes are vague and again, leave us fearful that important environmental reviews may be eliminated. More information is needed on what streamlining means.
- Impact Statement on Environment: this offers no supporting evidence to back the claim that the proposal will have positive environmental consequences. This is a vague ‘motherhood’ statement that lacks any scientific backing. The public has a right to know on what basis this claim is being made.

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. In this case, while BurlingtonGreen supports some of the proposed changes to the Forest Manuals regulated under the Crown Forest Sustainability Act, such as the inclusion of climate change in the Manuals and the use of technology such as the internet to improve public consultation and communication, we are opposed to the removal of important checks and balances in the manuals, and are looking for a greater degree of specificity and detail to support a number of the proposed changes.

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. 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