



**ONTARIO  
RIVERS  
ALLIANCE**

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4 February 2020

Joe Maure  
Forest Sector Strategy  
Ministry of Natural Resources and Forestry  
70 Foster Drive, Suite 610  
Sault Ste Marie, ON  
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By email: [ForestryStrategy@Ontario.ca](mailto:ForestryStrategy@Ontario.ca)

Dear Sirs:

Re: ERO-019-0880 Ontario's Forest Sector Strategy (Draft)

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization working to protect, conserve and restore healthy riverine ecosystems.

The ORA is pleased to provide comments on Ontario's Forest Sector Strategy, Draft (Strategy) to "*support existing businesses and help create more opportunities and prosperity in northern and rural Ontario while ensuring high standards of sustainable forest management*". The Strategy is a very broad and sweeping proposal to double logging in Ontario; however, it lacks any detail on what environmental safeguards and mitigation measures would protect water quality, species at risk and habitat.

The Strategy boasts of "*Ontario's globally recognized sustainable forest management system*"; however, this claim can only be made because of the rigorous environmental regulatory process that has been in place over the years.

Instead, "*the government's stated priorities of red tape reduction, job creation, and promoting economic growth and prosperity across the province*" makes no mention of what red tape will be cut. The Strategy claims to have "*a comprehensive system of legislation, regulations, policies, standards and guides*" to ensure sustainable forest management. However, reducing the regulatory burden on the forestry industry is very short sighted and will come at a high cost in terms of biodiversity, species at risk and the province's purported aim to reduce greenhouse gas emissions.

The Strategy makes no mention of how it will address the environmental impacts resulting from a doubling of tree harvesting from 15 million to 30 million cubic meters of wood per year by 2030. It makes no mention of how species at risk will be protected from such drastically increased habitat loss.

The Strategy doesn't address the impacts that increased clear-cutting would have in a warming climate, with the increasing frequency and intensity of extreme rain events and the erosion and run-



off that would negatively impact on our lakes and rivers. The Strategy offers no information on potential mitigation measures or what the net ecosystem benefits of a healthy forest would be.

ORA also objects to Ontario ratepayers and/or taxpayers having to subsidize electricity pricing and capital expenditures for industry and private corporations. This Strategy focuses only on the economic benefits of doubling the harvest, without looking at the trade-offs or balancing that with equal measures to maintain a healthy environment. This is the only way to maintain the claim of sustainable forest management in Ontario.

There is no mention of any limits on habitat loss to protect and recover species at risk, or no meaningful analysis of how doubling the harvest could affect our commitment to reduce GHG emissions. These environmental red tape cuts are coming at a time when we should be building resilience into our forests and freshwater resources.

It's time for the Ontario government to take a wholistic approach to economic development, one that recognizes the benefits of maintaining a healthy and resilient environment. It is time for private industry and corporations to come up with a Strategy that finds that healthy balance.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
(705) 866-1677

Cc: The Honourable John Yakabuski, Minister of MNRF - [Minister.MNRF@Ontario.ca](mailto:Minister.MNRF@Ontario.ca)