



May 8<sup>th</sup>, 2018

Honourable Catherine McKenna  
Minister of Environment and Climate Change Canada  
Government of Canada  
200 Sacre-Coeur Boulevard  
Fontaine Building  
Gatineau, QC  
K1A 0H3

Honourable James Carr  
Minister of Natural Resources  
Government of Canada  
580 Booth Street, 21<sup>st</sup> Floor, Room C7-1  
Ottawa, ON  
K1A 0E4

**Re: Ontario Alliance of First Nations and Non-First Nations Request Meeting on the Development of Socio-Economic Impact Analysis to Support Fair, Transparent, and Evidence-Based Species at Risk Policy**

Hon. Minister McKenna and Hon. Minister Carr,

An Alliance of First Nations and non-First Nations leaders representing rights holders, stakeholders, municipal leaders, unions, and Ontario's forest sector was formed in 2017 to defend a way of life, with a mandate to grow the responsible use of natural resources in Northern and Rural Ontario. Alliance members represent over 350 Ontario communities, over 500,000 unionized employees from across the country, several First Nations, and 38 forest product companies and forest managers.

Alliance members are concerned about the potential social, economic, and environmental impacts of species at risk (SAR) policy and, in particular, the current direction being proposed for managing and conserving caribou. The Government of Ontario has taken these concerns very seriously and have committed to achieving a better understanding of the impacts of climate change on SAR, the cumulative impacts of all SAR on a broad, dynamic landscape, and a much better appreciation of the socio-economic impacts. However, delivering on this commitment will take time. The Alliance remains very concerned that the window of opportunity being provided by the Ontario Government is now being placed into jeopardy by our Federal Government.

Alberta's Ministers of Environment and Parks, Energy, and Agriculture and Forestry expressed a shared concern in their letter addressed to you in March of this year. Alberta has suspended the consideration of conservation lands pending an outcome of a socio-economic study and has requested more time to avoid

prematurely implementing federal protection orders that will not seek effective outcomes for all Albertans. We believe that more provinces will join Alberta in voicing their concerns.

As identified in your April 30<sup>th</sup> progress report on woodland caribou, since 2012, Ontario has taken real and practical steps in managing caribou habitat on the ground. This includes the use of a “Dynamic Caribou Habitat Schedule” to ensure a sustainable supply of caribou habitat over space and time. However, a focus on habitat “protection”, rather than habitat renewal, and the continued reliance on an out-of-date disturbance threshold has doomed Environment and Climate Change Canada (ECCC) to failure. The Alliance is concerned that the conclusions reached in this report will form the foundation of an eventual Emergency Protection Order or Section 11 Conservation Agreement here in Ontario. The Federal Government can not inject itself into local/provincial jurisdictions while solutions are currently being developed.

Outright protection through the prohibition of human intervention or activities combined with the suppression of natural disturbances, will be detrimental to the sustainability of our managed forests and caribou populations. To conserve and improve ecosystem health, disturbance must occur. Carefully planned harvesting, in particular, is a mechanism that allows for an effective critical reset of forest age in order to maintain ecological integrity across the landscape, while having the added benefit of storing carbon in long-term wood products.

As forests in the boreal become older, they begin to decline, fall down, transition to different forest types that are less suitable for caribou, and release carbon dioxide. Other Canadian jurisdictions, where policy has also focused on habitat protectionism, have seen a trend towards older and more unhealthy forests. This has contributed to catastrophic natural events such as the insect outbreaks and wildfires we have seen recently in British Columbia.

We were disappointed to learn that ECCC did not use the April 30<sup>th</sup> report as an opportunity to include a discussion on the other factors that contribute to caribou herds being “*self-sustaining*”. Instead, ECCC continues to focus solely on disturbance thresholds, which was the only metric by which Canadian jurisdictions were judged.

The impacts of climate change on caribou herds, for example, is becoming more well known. Masood et al. (2017) found that caribou range extent was projected to contract by 57.2-99.8% by 2050, and a complete loss of boreal caribou in Ontario if winter temperatures increase by more than 5.6°C by 2070, regardless of changes in anthropogenic disturbances. Any habitat or population management intervention will be likely be ineffective when viewed from this perspective.

We are concerned that the role of Traditional Ecological Knowledge (TEK) has largely been absent from ECCC caribou policy development. Indigenous communities and rights holders within Ontario are taking on an increasingly important leadership role in the management of Ontario’s Crown forests, investing in the sector and, in some cases, becoming the forest manager and license holder. If, through a federal emergency order or Conservation Agreement, the Federal Government steps into traditional and provincial lands to prescribe how forests will be managed, there is a high risk that the progress we have made will be lost.

The Government of Ontario has estimated the impacts of caribou policy and found that up to 2800 jobs, \$271 million in gross domestic product, and \$166 million in tax revenue could be lost, despite a great deal of uncertainty that these actions will result in self-sustaining populations of caribou. This will disproportionately impact areas of Ontario that are already facing large social and economic inequalities when compared to the rest of the province.

On Wednesday, May 2<sup>nd</sup> the Northwestern Ontario Municipal Association (NOMA) passed the enclosed resolution at their annual conference, urging the Federal Government to hit the pause button and to allow for more time in developing solutions to SAR in Ontario. At the conference, delegates heard from health professionals who said socioeconomic status is a well-established predictor of human health outcomes. By limiting economic development in areas of Northern Ontario that already experience shorter life expectancies, higher death rates, and generally poorer health conditions and behaviours the Federal Government will be reinforcing a cycle of inequity in this country.

In Prime Minister Justin Trudeau's 2015 mandate letters to his Cabinet, it is stated,

*"We made a commitment to invest in growing our economy, strengthening the middle class, and helping those working hard to join it... I expect Canadians to hold us accountable for delivering these commitments, and I expect all ministers to do their part – individually and collectively – to improve economic opportunity and security for Canadians."*

In the strongest of terms, we urge the Federal Government to live up to this mandate. The Alliance, along with practitioners and licensed professionals, have solutions to these complex issues. We would be happy to meet with you at your earliest convenience to discuss a path forward and to ensure success for all Canadians.

Sincerely,



Mayor Wendy Landry  
Municipality of Shuniah  
NOMA President



Mayor Al Spack  
Town of Kapuskasing  
FONOM President



Chief Edward Wawia  
Red Rock Indian Band



Peter Moen  
General Manager  
Boundary Waters



Charla Robinson  
President  
Thunder Bay Chamber of Commerce



Jacques Jean  
1<sup>st</sup> Vice-President  
United Steelworkers



Gary Bragnalo  
National Representative  
Unifor



Chief Joseph Ladouceur  
Bingwi Neyaashi Anishinaabek



Mayor Ron Holman  
Township of Rideau Lakes  
ROMA Chair



Jason Lacko  
Union Representative  
United Steelworkers



Jamie Lim  
President & CEO  
Ontario Forest Industries Association

Encl. Northwestern Ontario Municipal Association Resolution #2018-24  
Alberta Ministers Letter, March 2018

cc Hon. Jonathan Wilkinson, Parliamentary Secretary, Environment and Climate Change Canada  
Jamie MacDonald, Senior Policy Advisor, Environment and Climate Change Canada  
Hon. Anthony Rota, Nipissing - Timiskaming  
Hon. Charlie Angus, Timmins – James Bay  
Hon. Don Rusnak, Thunder Bay – Rainy River  
Hon. Marc Serre, Nickel Belt  
Hon. Paul Lefebvre, Sudbury  
Hon. Patty Hajdu, Thunder Bay – Superior North  
Hon. Robert Nault, Kenora  
Hon. Terry Sheehan, Sault Ste. Marie  
Hon. Minister Bill Mauro, Ontario Ministry of Municipal Affairs  
Hon. Minister Glenn Thibeault, Ontario Ministry of Energy  
Hon. Minister Michael Gravelle, Ontario Ministry of Northern Development and Mines  
Hon. Minister Nathalie Des Rosiers, Ontario Ministry of Natural Resources and Forestry  
Hon. Minister Margaret McCuaig-Boyd, Alberta Ministry of Energy  
Hon. Minister Oneil Carlier, Alberta Ministry of Agriculture and Forestry  
Hon. Minister Shannon Phillips, Alberta Ministry of Environment and Parks  
Lisa Wardley, Chair, Northwest Species at Risk Committee (NWSAR)  
Eric Jorgensen, Member, Northwest Species at Risk Committee (NWSAR)  
Derek Nighbor, CEO, Forest Products Association of Canada  
Keith Murray, Director, Industry/Government Relations, Alberta Forest Products Association

### **Literature Cited**

Masood S, Van Zuiden T. M., Rodgers A. R., Sharma S. 2017. “*An uncertain future for woodland caribou (Rangifer tarandus caribou): The impact of climate change on winter distribution in Ontario.*” Rangifer 37:11. doi: 10.7557/2.37.1.4103