

February 12, 2015

Office of the Environmental Commissioner of Ontario 1075 Bay Street – Suite 605 Toronto, Ontario M5S 2B1

Algonquin Park's Sustainable Forest Management Operations Should Be Celebrated.

To the Office of the Environmental Commissioner,

On Thursday, January 22, 2015, the Ontario Forest Industries Association (OFIA) participated in the Sustainability Network's webinar featuring the Environmental Commissioner of Ontario's (ECO) 2013-2014 Annual Report. The OFIA and its members remain concerned with the ECO's ideological recommendation to ban forestry in Algonquin Park.

Statements made by the ECO during the webinar, such as "There is quite a bit of logging in Algonquin Park. It is a significant amount of activity," continue to show a fundamental lack of understanding for the sustainable forestry operations within Algonquin Park. Harvesting activities take place on approximately 1% of the forested area of the Park in a given year.

To date, the ECO has remained unable to make the case that forest management is compromising the ecological integrity of Algonquin Park. In fact, the ecological benefits of forest management in the Park are well documented, while the negative impact of such activities are not apparent. Hence, the recommendation to ban forestry in the Park is grotesquely unscientific and philosophical. The OFIA and its members - companies that have been operating in the Park for generations - maintain that sustainable forest management is consistent with the maintenance of ecological integrity in Algonquin Park.

The ECO's Annual Report 2013-2014 failed to acknowledge the socio-economic importance of forestry in the Park and its recommendations exhibited complete disregard for the socio-economic impacts. Yet during the webinar, the ECO stated, "This is a future recommendation. A lot of people make their living managing timber in Algonquin Park and I recognize that. We have to deal with economic realities, we can't move on this recommendation right now. There has to be other wood found outside the Park. There is no question we need to solve this problem before we can be successful."

We appreciate that these statements were made as a result of the feedback received to the ECO's 2013-2014 Annual Report from the OFIA and the multitude of companies and communities that depend on Algonquin Park's fibre. It is critical for the ECO to understand the implications of such a recommendation and not overlook the very real benefits that are derived from sustainable forest

The ECO's misunderstanding about fibre availability in central Ontario is apparent. Fibre from adjacent forest management units simply cannot substitute fibre from Algonquin Park, which represents over 40% of the total wood supply in the region. For example, over 30% of Ontario's total Sugar maple wood supply comes from Algonquin Park and is irreplaceable in terms of quality and quantity. Even small reductions to species specific wood supply can jeopardize the viability of the nine mills that receive part or most of their supply from the Park on a regular basis and can compromise the sector's overall ability to practice proper sustainable forest management.

The OFIA, the Algonquin Forestry Authority (AFA), and the Ontario Ministry of Natural Resources and Forestry (MNRF) have all established that further reductions to the available forest management area would be detrimental to both businesses and livelihoods and would irrevocably damage current and future sustainable economic development opportunities in communities throughout central Ontario.

During the webinar, the ECO suggested that "fire in the Park should be allowed." Given the Park's multi-use operating model, this is unrealistic, impractical, and unnecessary, as forest management can emulate the effects of natural disturbances like fire. Forestry and recreation co-exist in the park and these activities are complementary rather than conflicting.

The OFIA was pleased to finally hear comments from the ECO that showed support for Ontario's forestry practices: "I praise the Crown Forest Sustainability Act (CFSA) as a very progressive piece of legislation in my report. We do very good forest management in Ontario." Leading from this comment, we would expect the ECO to realize that Algonquin Park's exceptional forest management operations are governed by the CFSA and should be celebrated as an achievement of sustainable multi-use land stewardship, not destroyed as a perversion of the Provincial Parks and Conservation Reserves Act.

We welcome any opportunity to further discuss the important environmental, social, and economic aspects of forest management in Algonquin Park and in Ontario. Furthermore, we look forward to working with you to ensure that sustainable forestry in Algonquin Park continues to support the 10,000 citizens and their families who rely on it.

Regards,

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Ontario Forest Industries Association

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cc Hon Bill Mauro, Minister of Natural Resources and Forestry