



Jennifer Chikoski
Senior Policy Advisor
Ministry of Natural Resources
Policy Division
Species at Risk Branch
c/o Centre for Northern Forest Ecosystem Research
955 Oliver Road
Thunder Bay Ontario
P7B 5E1

March 10, 2011

RE: EBR Registry Number: 011-2303

Dear Jennifer,

Thank-you for the opportunity to respond to the Ministry of Natural Resources proposal for habitat protection for Woodland Caribou (forest-dwelling boreal population) under the Endangered Species Act, 2007. Environment North strives to improve and protect the ecological sustainability and socio-economic well being of Northwestern Ontario through leadership, research, partnerships, education, community advocacy, information and community capacity-building. We recognize that Environment North's specific actions and activities revolve around respect and shared responsibility for air, water and land, the essentials of all life. Environment North's 9 member Board consists of residents of the Thunder Bay region, and our membership is mainly comprised of individuals from across northern Ontario.

While we understand that the Province is trying to balance the socio-economic needs of northern Ontario with the protection of woodland caribou habitat, we strongly disagree with the proposed approach which would provide exemptions to most industrial uses. It seems overly complicated to designate different zones for development with some zones requiring permits under the Endangered Species Act, and other not. In addition, the "protection zones", as we understand them, are areas which would not be accessed for forestry until several forest planning and harvesting terms are complete (30-40 years). What will happen if these zones burn and do not supply caribou habitat as currently anticipated? Researchers are expecting significant increases in forest fires in the upcoming decades. To disregard this emerging reality is inappropriate, and potentially significantly detrimental to sustaining woodland caribou in this province. Furthermore, in the "protection zones", mining, as an example, will be required to obtain permits to

operate. As mineral exploration and development increases in northern Ontario, we can expect that demands for access to areas of high mineral value will increase. Permits will likely be issued to support this development, with fragmentation of the so-called “protection zone” occurring on one hand, and fragmentation of the so-called “conservation zone” on the other – both managed under separate approaches, overseen by separate Ministries and completely missing the opportunity to manage based on thresholds at the caribou range.

In addition, exemptions indicate to the public and purchasers of our forest products that we aren’t capable of meeting our own environmental standards. This will likely have significant repercussions for the forestry sector, in particular, as ongoing “do not buy” campaigns are likely to continue or accelerate in such an environment.

As a result, we believe the proposed approach will neither protect caribou nor sustain forestry jobs in northern Ontario. This compromised approach, which is supposed to convey balance, will instead be lose-lose.

Environment North believes that the entire caribou range should be subject to regulations under the Endangered Species Act that requires permitting under the Act, but that the government can do so in a streamlined fashion that does not overly burden industry with red tape. If activities are actually deemed to damage and destroy caribou habitat at the range level, and the Province chooses to allow this development, then at least the decision-making process will be transparent and consistent across northern Ontario.

Sincerely,

Scott Harris
Vice-President, Environment North
www.environmentnorth.ca