



Environment North
PO Box 30107
Thunder Bay, Ontario
P7B 6T8

September 25, 2008

Jason Travers
Manager, Ministry of Natural Resources
Natural Resource Management Division
Fish and Wildlife Branch, Species at Risk
300 Water Street
Peterborough, ON K9J 8M5

cariboufeedback@ontario.ca

Dear Mr. Travers,

Re: Development of MNR policy to guide Woodland Caribou conservation and recovery efforts in Ontario, EBR registry number: 010-4421

Since 1972, Environment North has functioned as a regional coalition of environmental organizations and individuals, based in Thunder Bay. Through research, education and community advocacy we promote sustainable communities and conservation of our resources. Our 9 member Board is comprised of people who live in northern Ontario, and we now have more than 100 members. On September 23, 2008, I attended the Caribou Conservation Plan Stakeholder session in Thunder Bay on behalf of Environment North. I have some grave concerns regarding the plan that is currently under review and the approach taken by the Ministry of Natural Resources to consult with the public on this issue. The presentation at the stakeholder session **over-represented the forest industry** with multiple representatives from the Ontario Forestry Coalition who have already made strong statements that they are unwilling to entertain any changes to the way forest harvesting is conducted in order to meet the requirements of the new Endangered Species Act. In addition, the invitation was sent without very much notice (2 weeks), and as a result, our group, which is largely comprised of volunteer members, struggled to attend the session due to scheduling conflicts. Most disconcerting, the Ministry of Natural Resource staff seemed to suggest that they were expecting very different results from the northern and southern workshops, which begs the question as to the purpose of the workshops. I attended expecting that MNR was genuine in trying to find solutions between varying values and

expectations from our forests, but dividing what this Ministry considers “northern” versus “southern” Ontario interests seems doomed to fail.

We were impressed with the Scientific Panel’s report posted with the EBR, however, despite the MNR’s claim that the Caribou Conservation Plan reflects the current science, it is clear that the Ministry has only selected those parts of the report that are consistent with current management, and ignored statements made by the Scientific Panel, included the experimental nature of the current management approach. In addition, we share the concern of the Scientific Panel that MNR is promoting a “false assertion that society must choose between the economy and the environment ... In reality, the “jobs versus the environment” choice is a false dichotomy: the real choice is between short-term gain and long-term, sustained prosperity... Economic development and prosperity hinge upon maintaining an adequate flow of essential services provided by natural ecosystem”.

Nonetheless, Environment North is pleased to provide comments on the above-noted strategy and hope our comments will be considered during the development of the Caribou Conservation Plan. Ensuring the health of caribou populations is critical. Not only are they indicators of healthy forests, but we have a moral obligation to sustain these populations. Woodland caribou’s steady disappearance from half of their historical range is an indication of the significant loss of ecological integrity that has accompanied the industrialization of our northern landscape. There is no question that human beings have played a significant role in the loss of caribou habitat, and that needs to change.

In your discussion paper you ask for our opinion regarding the goals of the conservation plan. The following are the key components we would like to see:

- 1) We support the goal put forward by the Woodland Caribou Science Review Panel: “Self-sustaining populations of forest-dwelling woodland caribou should be maintained wherever they exist in Ontario, declining populations should be strengthened, and woodland caribou should be re-established on strategically chosen ranges.”
- 2) The Conservation Plan must reflect a two-pronged approach. First, a survival strategy which will recognize the fact that current forest management has inherent risks, and for the most part, we will not know the implications for woodland caribou populations until after the impacts have already occurred. As such, in this survival strategy, MNR must protect all existing high caribou use areas (areas that caribou are actually using in the winter, larger than 5,000 ha, with no roads), and connecting habitat. This may prove to be a medium-term solution as we wait to see how caribou actually repopulate harvested areas. The longer term plan is the harvesting experiment, which may continue in areas already fragmented and not used by woodland caribou.
- 3) As promised during Ontario’s Living Legacy, sub-regional planning needs to be completed in areas where timber harvesting is licensed. This is critical to understand the needs of species at risk, such as caribou, as well as opening up the dialogue to new community-based economic opportunities. Given the dramatic decrease in wood

demand, there should be ample supply to identify new uses. We must seize this opportunity to make change.

- 4) In the original Thunder Bay and Nipigon District planning, it was agreed by stakeholders that all roads would be designated permanent or temporary during the planning process to provide clarity to the public. This was arbitrarily removed when these were put into the Crown Land Use Atlas. We would like to see this included in planning as it moves forward, since the decommissioning of roads will be critical to woodland caribou survival. We also need a commitment for roads planning to occur at the regional level.
- 5) In areas where caribou habitat is currently unroaded, we suggest an extensive management approach, which applies rotation cycles beyond the current 100 year cycle to ease the pressure on these systems. These areas may also overlap with remote tourism and, with good management agreements in place, could result in economic development that has a lower impact on woodland caribou. In currently roaded areas, MNR could consider more intensive, yet sustainable, timber harvesting.

We appreciate the opportunity to provide input into the policy direction for Ontario's Caribou Conservation Plan, and look forward to your response.

Sincerely,

Lynn Palmer, RPF
Board of Directors
Environment North