



LONG-TERM THINKING FOR TODAY'S ISSUES

November 7, 2021

Public Input Coordinator
Species at Risk Branch
Ontario Ministry of the Environment, Conservation and Parks
300 Water St.
5th Floor, North Tower
Peterborough, ON, K9J 8M5
Via email: ESAReg@ontario.ca

Re: ERO 019-4278 Minister's Order for Temporary Suspension of Protection upon the Listing of Black Ash under the Endangered Species Act

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

As significant landowners in the province, farmers will be vital to the ongoing success of protection and future prosperity of Black Ash trees. Farmers should be fairly supported in their stewardship efforts on private property undertaken for the broader benefit of society, the environment and Black Ash as a species.

The CFFO supports the government proposal of a Minister's Regulation to pause protections under the Endangered Species Act on Black Ash for a period of two years. As the proposal outlines, Black Ash are currently still widespread across the province, and the main risk to Black Ash, the Emerald Ash Borer (EAB), is not a human-caused threat. There may be challenges to effectively protect both the habitat and individual trees in the face of this threat. The CFFO supports measures that will protect the future survival of this species while also maintaining economic and cultural uses. An effective response may need to be more nuanced than what is currently prescribed through an "endangered" listing under the Species at Risk in Ontario list.

The CFFO asks that the ministry consider impacts to agriculture and tree nursery trade. In particular the CFFO recommends that:

- Voluntary landowner stewardship should be encouraged and supported.
- Black Ash should still be able to be bought and sold in the nursery trade.
- Landowners should continue to be allowed to cut ash trees on their property, including to help control EAB and maintain overall woodlot health and sustainability.

- Harvested Black Ash from properties associated with a valid FBR number should still be eligible for sale.

Voluntary Stewardship

The CFFO recommends that during this two-year period, the government introduce a voluntary stewardship program for landowners to support the protection and future prosperity of these trees. This program could include initiatives such as the following:

- Information for landowners on risks to Black Ash and effective solutions to protect the species.
- Funding to support woodlot-specific assessments for resistant trees.
- Funding to support consultation with forestry professionals to establish management plans for existing ash trees in woodlots.
- Funding to support research and breeding based on resistant genetics.
- Funding for practices that may protect individual trees from EAB attack.

Nursery Trade

Nursery trade in Black Ash should be allowed to continue as a way to promote planting of new trees. In particular, trees with genetics that have proven to be resistant to EAB should be promoted and sold to replace lost trees where possible.

Farmer Woodlot Management

One of the strategies to prevent the spread of EAB and to sustain the overall health and sustainability of existing woodlots has been to selectively remove ash trees. Under professional advice, this often includes reducing but not eliminating the ash tree population and replacing them with a mix of other suitable species. Practices such as this should be allowed to continue.

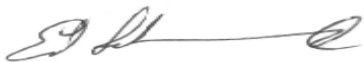
Farmers have often invested significant time and resources into long-term management of their woodlots. They should be allowed to harvest and sell Black Ash and derive appropriate income from their management efforts while this is still possible. This will support ongoing good management of woodlots into the future.

Conclusion

The CFFO recommends that support for voluntary stewardship of Black Ash trees, Black Ash habitat and EAB-resistant genetics should be implemented. Black Ash should still be able to be bought and sold in the nursery trade. Farmers with woodlots should continue to be allowed to cut Black Ash trees on their property and sell the harvested wood. This will promote better overall woodlot management and sustainability into the future.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario