

**Finding Balance in the Endangered Species Act
Timmins Chamber of Commerce, Greater Sudbury Chamber of Commerce,
and Sault Ste. Marie Chamber of Commerce**

Issue:

Species recovery strategies and conservation plans created under the Endangered Species Act (ESA) are not subject to socio-economic impact analyses and, as a result, may have significant negative impacts on Ontario's forestry industry and the communities that rely on its vitality.

Background:

Ontario's Endangered Species Act, 2007 (ESA) prohibits damage or destruction of habitat for species classified as 'endangered' or 'threatened' on the list of Species at Risk in Ontario. Corresponding government strategies such as conservation plans and recovery strategies are not subject to socio-economic impact analyses, despite their potential impact on Ontario's forestry industry, which employs 200,000 workers across 260 communities.

The need for such analyses when developing conservation plans under the ESA is best demonstrated by the problems inherent in the Caribou Conservation Plan (CCP). Produced under the Endangered Species Act in 2009, this plan is designed to guide caribou conservation and recovery efforts in Ontario through means that include limiting access to Crown fibre.

Among the CCP's guiding principles is the "consideration of social, economic and environmental concerns in the context of long-term caribou survival." However, the action plan does not mandate the completion of a socio-economic analysis, nor has there been any indication that the government intends to do so.

As a result, the CCP has led to a severe reduction of fibre supply in many regions, a figure that will reach as high as 65% in some areas such as the Abitibi River Forest in northeastern Ontario; this will result in the loss of thousands of direct and indirect jobs, severely hampering the forest industry and the communities it supports. The anticipated blow to the economy has been denounced as "devastating" by a range of municipal and industry groups, including the Northwestern Ontario Municipal Association, the Ontario Forest Industries Association, and the Federation of Northern Ontario Municipalities.

Alternative agreements that have since been struck between environmental groups and industry, such as the Canadian Boreal Forest Agreement, demonstrate that a balanced approach to conservation can lessen fibre supply reductions while providing even stronger opportunities for caribou recovery.

Recommendations:

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Require socio-economic impact assessments for all future conservation plans to be developed under the Endangered Species Act (2007), subjecting results to public review.
2. Conduct a full review of the Caribou Conservation Plan, using a publically reviewed socio-economic impact assessment and defensible science to determine caribou range boundaries.