



October 29, 2014

Gord Miller  
Environmental Commissioner of Ontario  
1075 Bay Street, Suite 605  
Toronto, Ontario  
M5S 2B1

**Re: *Managing New Challenges: Annual Report 2013-2014, Section 3.4: Cutting into Ecological Integrity: Commercial Logging in Algonquin Park***

Dear Mr. Miller

The Canadian Institute of Forestry/Institut Forestier du Canada (CIF/IFC) would like to respond to the report released by the Office of the Environmental Commissioner of Ontario (ECO) on October 7<sup>th</sup>, 2014, entitled *Managing New Challenges: Annual Report 2013-2014*. In particular, the CIF/IFC would like to address specific claims made in Section 3.4, *Cutting into Ecological Integrity: Commercial Logging in Algonquin Park*.

First, the CIF/IFC would like to address the ECO's claim that logging compromises the ecological integrity of Algonquin Park. The June 2013 amendment to the Algonquin Park Management Plan entitled "*Lightening the Ecological Footprint of Logging*," has taken special consideration regarding the ecological integrity of the Park, and included increased protection of important park values, which include habitat connectivity, brook trout waters, species at risk, and under-represented ecosystems. More importantly, the silvicultural systems used within the recreation/utilization zone of Algonquin Park are designed to emulate natural disturbance patterns that result from tree mortality, wind events, or forest fires. This practice of natural disturbance pattern emulation ensures natural forest cover is maintained, diversity in forest age and structure is created, and essential habitat and ecosystem characteristics are protected. Natural disturbance is not present on the landscape in the majority of Ontario parks, due to a culture of fire suppression. In Algonquin Park, forestry operations emulate the forest fires and other disturbances that are required to maintain the forest and its diversity. For example, logging provides the disturbance mechanisms required to regenerate pine under the constraints of fire suppression within the Park. One only has to look at the story of the Big Pines Trail along highway 60 in Algonquin Park to witness the demise of old growth white pine in protected areas.

Algonquin Forestry Authority's sustainable forest management (SFM) policy and plan are certified to the CSA Z809 SFM standard, and their environmental management system (EMS) is certified to the international ISO 14001 environmental standard—both are the result of annual third party certification audits. The forest management planning process that takes place in Algonquin Park is carried out in accordance with the Crown Forest Sustainability Act (CFSA). This provides stringent guidelines for forest management, and requires meaningful consultation with the public, Aboriginal peoples, and other stakeholders. Forest management objectives, which are outlined in the Forest Management Plan have the goal of balancing environmental, social, and economic criteria, and consider a significant number of ecological indicators—maintaining ecological integrity is built into sustainable forestry targets. Forest Management Plans are rigorously prepared, and consider multiple values, including wildlife, biodiversity, recreation, ecosystem management, and social-cultural values. Indeed, the forest management and certification process in Algonquin Park, and across Ontario, is world class and one that Ontarians and its government should be proud of.

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*Voice of Forest Practitioners / La voix des professionnels de la forêt*

**Canadian Institute of Forestry/Institut forestier du Canada**

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The ECO claims that “logging in Algonquin is unnecessary, as there is an ample wood supply in the areas outside of the park.” This position is not supported by various studies, which have found that any further reductions in available forest management area would be very damaging to the many businesses and citizens who rely on logging in Algonquin Park for their livelihoods. This conclusion was reached by the Ontario Ministry of Natural Resources and Forestry (OMNRF) and the Algonquin Forestry Authority (AFA), after a thorough analysis of wood supply levels in central Ontario. An independent study carried out by KBM Resources Group that studied the socio-economic significance of forestry in the Park confirmed the conclusion reached by the OMNRF and the AFA. Since this study was completed, the Endangered Species Act has also been introduced, which is adding more constraints on wood supply in Algonquin Park and across the province. It is estimated that forest operations within the Park provide employment for over 10,000 people—2,775 direct and over 8,000 indirect. The reliance of these jobs on the sustainable forestry practices that take place in Algonquin Park cannot be dismissed.

The ECO also purports that the roads necessary to conduct logging within the Park cause a number of problems, by “damaging habitat, harming wildlife, and acting as a pathway for invasive species.” The CIF/IFC would like to point out that the AFA plans road construction such that ecologically or socially sensitive areas are avoided, in order to minimize negative effects on wildlife and habitat. These roads are often decommissioned after operations to ensure critical areas, such as species at risk habitat, are not negatively affected by unauthorized access. In addition, the re-use of existing roads is a common practice, which helps to minimize the impact of the road system within the Park. Interior roads within the Park are also closed to public transportation for the protection of Park values. This not only reduces the risk of introducing invasive species, but it also reduces traffic and any associated threats to wildlife mortality. These roads are also used by Park staff to practice fire control, to rescue lost or injured campers, and to conduct scientific research.

The CIF/IFC supports logging in Algonquin Park for many reasons. The forest management practices in Algonquin Park are carried out under a comprehensive and stringent management system, which protects multiple values, including Park values. Forest management within the Park is science-based and adaptive, and is recognized nationally as demonstrated by the Canadian Forest Management Group Achievement Award presented to the AFA in 2012. In fact, forestry operations within the park have facilitated the development of important silvicultural guidelines that are now widely adopted. Finally, the operations that take place in the Park provide employment to many Ontario citizens, and are economic drivers for many communities. During this important period of economic recovery within the forest industry, it is imperative that the government lend its support to the AFA, and to like organizations that are contributing to a sustainable forest and a sustainable economy. The CIF/IFC would urge the ECO to take a balanced approach to evaluate logging in Algonquin Park, and consider all elements of sustainability, including environmental, social, and economic criteria. We would welcome the opportunity to further discuss this issue with you.

Sincerely,

A.L. Stinson  
President  
Canadian Institute of Forestry

John Pineau  
Chief Executive Officer  
Canadian Institute of Forestry

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