



November 1, 2017

The Honourable Kathleen O. Wynne, MPP Premier of Ontario
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The Honourable Kathryn McGarry, Minister of Natural Resources and Forestry
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**Re: Ontario Needs Government Leadership to Ensure Tree Seed
for Resilient Forests**

Dear Premier and Minister:

This is a long letter because the issue is important and complex – there is no simplifying it.

We were shaken by the August 2017 announcement by the OMNRF that the Ontario Tree Seed Plant is scheduled for closure in September 2018.

Firstly, it shows a disturbing **lack of government vision for Ontario's forests under climate change**. If our provincial government is not in this game who is? Who can be expected to ensure that there will be sufficient supplies of high quality, locally adapted tree seed of native species? Who will provide the leadership in facilitating the implementation of this critical adaptive strategy, to ensure our forests will be able to provide the environmental services our society's welfare depends on? Those services which are highlighted in Ontario's Action Plan on Climate Change: <https://www.ontario.ca/page/climate-change-action-plan#section-11>

The FGCA has worked closely with the MNRF and the Seed Plant since 1994. Together we provided services that made it easier for forest managers to do the right thing – to understand and apply core genetic resource management principles. And in January this year the FGCA was recognized by Minister McGarry, as a partner in assisting southern Ontario crown forest management and delivering **Ontario's Biodiversity Strategy** goals.

We have been developing a forest genetic resource management plan with our crown forest management partners, and the Seed Plant was, as always, a cornerstone – essential to our success. The Ontario Tree Seed Plant's expert staff, facilities and seed banks have long provided a foundation for Ontario's forest management. **We had hoped that this would not only continue, but be enhanced, in service to Ontario's forests which face the triple threats of overdevelopment, invasive alien species and climate change.**

The following elements, critical to our success, are now uncertain, with little time to adjust:

- Seed Collector networking and training to enhance their crop forecasting and collection success, necessary to support the Crown Forest and 50 Million Tree Programs,
- Expert processing, testing, banking and deployment of source-identified, southern Ontario seed of dozens of native shrub and tree species
- Increasing the strategic banking of specifically sourced, high-quality seed from 5-year to 10-year supplies
 - to withstand climate change effects on seed production
 - to allow assisted migration in a changing climate
- Logistical facilitation of the use of the MNRF Tree Seed Zone Directive, and the Seed Transfer Policy now in development
- Logistical expert collaboration with the National Tree Seed Centre to support special conservation collections such as Carolinian species and ash, the latter as a conservation strategy to offset the effects of the emerald ash borer
- Development and support for a Climate Change assisted migration seed procurement network with USA seed managers to ensure the safe import of high quality, source-identified seed.

Specifically, we are deeply concerned that the Tree Seed Plant closure decision:

- was made without client and public consultation;
- was made without sufficient, expert analysis of its effects; and where in fact several OMNRF management staff conclusions have been shown to be mistaken;
- was made without respect for the unique expertise of Seed Plant staff, including their extensive networking that has ensured high quality seed and seed source chain of custody;
- **was made without taking into account that MNRF transformation and cutbacks since 2010 resulted in poor cost management that constrained the Plant's significant mandate;**
- takes Ontario in a direction opposite to jurisdictions who recognise tree seed processing and banking as an essential social service to help adapt to climate change;
- does not recognise that the private sector alone cannot undertake this significant and necessary challenge to ensure the resilience of Ontario's forests;
- seriously constrains private sector growers' ability to follow government seed policy as per the Crown Forest Sustainability Act and the 50 Million Tree Program's objectives;
- is being enacted too quickly to develop short and long-term options that will provide seed for reforestation practitioners, and ensure the quality of the seed currently in storage;
- is proposing, instead to put resources into a yet undefined *native tree seed genetic archive* for internal OMNRF science needs, which will not address any of these challenges, and is actually already provided for by Natural Resources Canada's National Tree Seed Centre.

OMNRF management staff have publicly stated that they will work with some clients to address options for their seed processing and banking needs. But little communications have happened, despite the very tight timelines faced by all clients.

There is great urgency for all clients to address short-term options

- for moving their seed, currently in storage at the OTSP, to other secure, expert banking facilities, which currently don't exist in Ontario
- for seed processing, needed annually, and as early as June 2018 for some species.
- to obtain the rare and highly skilled seed processing, banking and testing expertise that results in high quality seed which can be banked and made available over the long term (decades) to support climate change forest adaptation strategies.

We respectfully and urgently request that:

1. **A Stakeholder Committee be constituted immediately** that would include: Forests Ontario, Sustainable Forest Licensees, Growers, OMNRF's partners in forest genetic resource management (e.g. FGCA), local community groups (Friends of the Utopia Mill & Park), representatives of MOECC and OMAFRA, and OMNRF Seed Policy staff;
2. **The Stakeholder Committee report no later than 4 months** from the date of it being constituted; the report to outline potential alternate modes of delivery, including via a non-profit entity, with the objective of possibly relieving ongoing operating expenses presently incurred by the Government of Ontario with regards to this facility;
3. **Any and all actions on the closure of the Ontario Tree Seed Facility be immediately put on hold** pending the outcome of a consultative process;
4. **That an emergency meeting be convened through your offices, with the above representatives and yourselves by November 14, 2017.**

Premier and Minister, there is an opportunity for the OMNRF to engage in a proper consultation process that will result in solutions to this urgent challenge; solutions that must involve Government support and oversight, but most importantly leadership, on behalf of all of Ontario. We live in a forest – but there's no forest without seed.

Respectfully,



Barb Boysen, General Manager, FGCA

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