

... shows a **disturbing lack of a vision for Ontario's forests** within the context of climate change.

What is the government's strategy to ensure that there will be sufficient supplies of high quality, locally adaptable tree seed of native species?

Where is government 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 upon?

... takes Ontario in a direction opposite to jurisdictions that recognise tree seed processing and banking as an essential social service to help adapt to climate change

(the Treed Seed Plant closure decision) was made without respect for high quality seed and seed source chain of custody

... was made without taking into account that MNRF (Ministry of Natural Resources & Forestry) transformation and cutbacks since 2010 results in poor cost management that constrained the Plant's significant mandate

... was made without sufficient expert analysis of its effects; and where in fact **several MNRF management staff conclusions have been shown to be mistaken**

... 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 MNRF 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.

Premier and Minister, there is an opportunity for the MNRF 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 is no forest without seed.

It (the October 11, 2017 public forum) was an arduous meeting with the closure rationale based on the facility operating in the red. However, unaddressed were the short and long term ramifications of such a closure, and the fate of decades of work under the OMNRF's long standing 'seed zone tracking' policy.

... **inherent risks associated with a failure to maintain the "seed zone" approach**, which could include:

- a. **reduced restoration and afforestation success rates** associated with the use of inappropriate seed sources;
- b. **additional restoration and afforestation costs** associated with mitigating poor results due to inappropriate seed and nursery stock; and
- c. the broader **concern related to the contamination risks of local source tree genetics** (i.e. what are the genetic impacts likely to be if seed sources from a broad range of forest zones and climates are now readily used in Ontario projects?)

Southern Ontario, with its mix of urban, rural, and agricultural landscapes has unique challenges in maintaining healthy native forests, forest corridors, and urban canopies.

The DSLSN hopes the OMNRF will find new ways that the Angus facility can **become viable as a southern operations hub to maintain seed integrity, diversity, and availability for ongoing native tree plantings.**

Dufferin Simcoe Land Stewardship Network
November 28 2017

In order to fully realize the benefits of green infrastructure in Ontario, it is important to have a reliable supply of native tree stock. For this reason, GIO was concerned to hear the August 2017 announcement ... that the Ontario Tree Seed Plant (the Plant) is scheduled for closure in September 2018.

The Plant has played a critical role in forest (including urban forest) management and restoration for almost a century, and its closure **could lead to a long-term reduction in Ontario's capacity to support and management of public and private green infrastructure.**

Such an abrupt closure is likely to result in negative consequences to Ontario's forests which are already facing challenges associated with climate change and invasive species.

Closure of the Plant will have serious implications to urban forest managers and the 50 million tree program.

Reducing the supply of quality seeds for growers in the province may result in an increase in imports from outside of Ontario, at a cost to municipalities and the 50 million tree program. This cost **will either result in less planting, or an increase in lower quality and less genetically diverse stock which will ultimately be very costly to municipalities, conservation authorities and the public.**

Seed source is essential to the success of tree planting and biodiversity initiatives. The Plant focuses on seeds from native species, which provide the foundation for a diverse forest community. Furthermore, the Plant ensures seed zone identification so that seeds may be returned to the area of origin for reforestation where it can thrive.

Reduced seed supply may lead to increased purchasing of seeds and stock from suppliers from outside the province. With this increased movement of stock, there is a greater risk of introducing new invasive species and pathogens to our existing tree populations.

To ensure that Ontario is able to meet its goals of climate change adaptation, invasive species management and biodiversity protection, any action to close the Plant should be put on hold until the province has provided sufficient evidence that the costs of operating this facility outweigh the value it provides to the province as a whole.

Tree seeds are critical to the health and longevity of Ontario's forests.

For our natural and human-made environments to prosper despite the increasingly chaotic effects of climate change, it's important to have a facility that maintains and generates high quality seed of known origin.

The OTSF in Angus, Ontario specializes in the processing and storage of billions of tree seeds. It supplies seeds for public and private forests across Ontario, but is **managed by only six expert staff and costs less than two million dollars annually**. I am dismayed by MNR's decision to terminate such an important and cost-effective facility without investigating alternative sources of funding or consulting with clients, stakeholders and the community.

The history of seed programs in Ontario demonstrates the enduring requirement for a facility like the OTSP.

Ontario's forests are susceptible to threats associated with climate change, invasive species, plants and diseases, and increased deforestation due to development. They cannot survive and thrive for future generations without the help of venerable organizations like OTSP.

Irene Fedun

In the last ten years alone, KCCA has planted over 850,000 trees in its watershed. The seedling stock we plant is sourced from nurseries that rely on seed from the Ontario Tree Seed Plant.

Kettle Creek Conservation Authority
November 20 2017

The costs of the Ontario seed plant is miniscule compared to its role in growing an enormous value chain that provides environmental, health, social, recreational, aesthetic and therapeutic benefits.

Sometimes economic decisions are based on a narrow set of parameters without seeing the bigger implications.

Landscape Ontario
November 24 2017

.. it (the Ontario Treed Seed Plant closure) shows a disturbing lack of a vision for Ontario's forests under climate change.

What is the government's strategy to ensure that there will be sufficient supplies of high quality, locally adapted tree seed of native species?

Where is government 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?

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 ...

There is great urgency ... 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

School of Environmental and Natural Resource Sciences
Fleming College
November 9 2017

I am deeply concerned and disappointed about the August 2017 announcement by the OMNRF that the Ontario Tree Seed Plant is scheduled for closure in September 2018.

A facility which (has) played a critical role in forest development for decades ... the long-term reduction in Ontario's capacity to support the positive management of public and private resources.

This is particularly disturbing considering the challenges the forests and industry face of accelerating climate change and downstream effects on forest health and productivity and the relatively minimal costs associated with seed plant operations.

I have been a professional forester for over 40 years both in Ontario and Quebec. I am presently a Director of the Forest Gene Conservation Association. I have seen the FGCA letter to you and I support and agree 100% with their concerns and their request to you.

In these 40 years I have seen the value of facilities such as a tree seed processing operation, how it supports reforestation efforts in Ontario, how it works to provide processed seed for the multitude of trees and shrubs species in southern Ontario, how it alone has dealt with the processing of rare and uncommon tree species in Ontario.

I have seen the steady erosion of support in the past few years from

- outdated policies
- no changes in pricing
- no disposing of unneeded facilities on the properties
- financial constraints over the years
- a lack of interest by Senior Management

This closure ... further highlights the erosion of interest in the forests of southern Ontario by the government.

In this era of unprecedented climate change ... (the government) does not have the vision to recognize that **a tree seed processing plant is a critical part of the adaption to climate change that should remain under public control.**

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.

Terry Schwan, M.Sc., R.P.F.
November 15 2017

The historical availability and access to adequate tree seed for Ontario's forest regeneration programs can no longer be presumed due to current changes in harvesting practices and the availability of a workforce to collect the seed. As well, the future availability of adapted seed within Ontario as the climate changes also is a threat to the future seed supply.

The closure of the OTSP means that the forest industry will have to locate the replacement capacity for the long term storage of Ontario's tree seed outside of the province.

... it must be recognized that the private sector alone cannot meet the significant challenge of ensuring the resilience of Ontario's future forests. **The number of tree species and the number of seed sources required to maintain resilient forests will be much greater than currently exists. This is clearly a case where government needs to lead.**

Within forest industry we understand the requirement for managing the fiscal bottom line, however it's possible that the relevance and need of the OTSP has been inadequately assessed.

This decision is incongruent with the actions of provincial and international jurisdictions who are preparing for a future changing climate.

NeSMA partners suggest that the MNRF reassess and verify the information upon which the closure decision was made.

northeast seed management association (NeSMA)
November 13 2017

How will your government ensure that there will be sufficient supplies of high quality, locally adapted tree seed of native species?

How will your government facilitate the implementation of a critical adaptive strategy, to ensure our forests will be able to provide the environmental services our society's welfare depends on?

The announced closure of Ontario's seed plant in Angus will bear significant challenges for the FCC (Ferguson Forest Centre) which could lead to further employment loss in North Grenville Not only will this impact both direct and indirect jobs in our community, it will also ignore three years of hard work to seek to renew the Campus and bring back the jobs that were lost.

David Gordon, Mayor
North Grenville
November 27 2017

I would suggest that the Minister (of MNRF) is grossly misinformed by her staff.

How can our government be **so ill-advised on the subject matter** when it is a major part of its pledge to its constituents to fight Climate Change and build a fair Cap and Trad (carbon sequestration) system.

The government is not positioning itself very well by removing the one entity that can have the earliest, and perhaps most important impact.

If the trees we grow, and by extension the forests, are our defence in mitigating climate change, and make up the currency in our Cap and Trade system, then the seed from which they emerge is steel and gold.

As for privatization -- the great saviour here -- has this really worked in other areas of our sector, the closest to this being the tree nurseries?

Today, between 60% and 70% of all tree seedlings planted in Northern Ontario are propagated outside the province. That has no economic benefit to Ontarians or Ontario businesses. Furthermore, a large portion of seed processing operations for Ontario clients in the north are done out of province as well. Expecting the private sector to take over is just abandonment of responsibility. What kind of leadership is that?

We're asking that you help us continue and build upon the good and important work started almost 100 years ago, for our future.

Dave Harbec, Manager
Somerville Seedlings
November 20 2017

This decision **shows a disturbing lack of a vision for Ontario's forests** under climate change.

... does not support and goals and objectives of the Ontario Biodiversity Strategy, the Ontario Invasive Species Act or the Conservation Authorities Act.

Closing of the OTSP will also eliminate the knowledge base that has been created over decades. ... Once we have lost the expertise in this field, it will take decades and millions of dollars to re-create. The cost of mistakes could be incalculable.

In British Columbia, the provincial government reviewed the status of their tree seed plant a number of years ago, planning to privatize or close it, but instead decided to designate it a *Mission Critical* component of the Ministry of Forests and Range plans. They recognized the importance of seed for their future forests.

Closure of the OTSP is a classic case of selling the furniture to pay the rent. It is a short-term way to reduce some immediate costs, while either eliminating an important government function, or creating a situation where government has to re-create the function at huge expense later when they realize the mistake that was made.

Government programs that have a mandate to plant trees and deal with climate change impacts will have a more difficult time carrying out their work without the OTSP in place and functioning well.

The province needs to modernize and renovate the OTSP and widen its mandate, not eliminate it.

Society for Ecological Restoration, Ontario Chapter
January 30 2018

The Ontario Tree Seed Facility has played a critical role in the sustainability of forests, both urban and rural, in Ontario since 1923. Its closure will result in a long-term reduction in Ontario's capacity to support the planting of and management of public and private forests.

Having a publicly-owned and publicly-accountable facility that ensures there is a source of quality local seed is both responsible and a strategic investment that is essential to protecting the genetic and species diversity of Ontario's forests. The Ontario Tree Seed Facility is exactly this.

Closure of the Ontario Tree Seed Facility, and the subsequent reduction in seed supply, will lead to an increase in purchasing seed and stock from suppliers from outside of Ontario. With this increased movement of imported seed stock, there is a much greater risk of introducing new invasive species and pathogens that could damage or event destroy our existing tree populations.

... closure of the Plant will result in a reduced capacity to plant quality trees based on seeds appropriate to the 36 seed zones in Ontario. This will impact Ontario's ability to meet it's climate change mitigation and adaptation goals.

With the closure of the Ontario Tree Seed facility, there will be a decline in the supply of seeds for native trees ... This is going to put increased financial pressure and potential decline in the supply of trees for municipalities and other tree-planting organizations, that are trying to plant trees from known, quality sources. In turn, fewer trees (or lower quality trees) will be planted, leading our communities to become less healthy, resilient, and sustainable.

Ontario Urban Forest Council
January 22 2018

... the southern seed requirements need more consideration than was given in the decision process ...

The MNRF staff presentation was based on operating costs and market size. There was no consideration placed on the value of the seed staff in assisting growers in the use of seed to improve the value of stock being produced.

I believe the MNRF should reconsider its decision and undertake a process that includes the public and industry

... (this decision) ... **is just a continuation of its (MNRF) increasing abdication of its responsibility to maintain the value of its forest lands, crown and private in the south.**

Ken Reese
October 2017