

November 13, 2017

The Honourable Kathleen O. Wynne, MPP Premier of Ontario  
Room 281, Main Legislative Building, Queen's Park  
Toronto, Ontario M7A 1A1  
[kwynn.mpp.co@liberal.ola.org](mailto:kwynn.mpp.co@liberal.ola.org)

The Honourable Kathryn McGarry, Minister of Natural Resources and Forestry  
Suite 6630, 6th Floor, Whitney Block, 99 Wellesley Street West  
Toronto, Ontario M7A 1W3  
[kmcgarry.mpp.co@liberal.ola.org](mailto:kmcgarry.mpp.co@liberal.ola.org)

**Re: Closure of the Ontario Tree Seed Plant**

**Dear Premier and Minister:**

This letter summarizes the requests and concerns of the Northeast Seed Management Association (NeSMA) about the August 2017 announcement by the Ontario Ministry of Natural Resources and Forestry (MNRF) that the Ontario Tree Seed Plant (OTSP) is scheduled for closure in September 2018.

NeSMA respectfully requests that:

1. The decision to close the OTSP be reassessed and that options be investigated to redefine its role with a view to emerging and future needs.
2. All activity regarding the closure of the OTSP be suspended pending the outcome of a consultative process with stakeholders.
3. Upon completion of a stakeholder consultative process, a well communicated plan of action be prepared for the closure or retooling of the OTSP.

The following items related to the closure announcement are particularly concerning:

1. 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.

2. 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. We've explored this with other provinces and adjoining jurisdictions within the United States, but facilities to store tree seed under the required conditions are "few and far between" in Canada. Given this reality, more time is needed to find and/or develop short and long-term options for our seed.
3. The assumption that private enterprise will invest in the specialized services currently provided by the OTSP is unsubstantiated. Based on our discussions, private industry will be hesitant to modify their business models and develop capacity when they don't foresee receiving an adequate return on their investment. The OTSP provides an essential service that is foundational to forest management in Ontario. Without minimizing the important future role that forest industry will assume in mitigating the effects of climate change, 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.
4. One of the most surprising aspects about this announcement is that there appears to have been limited client or public consultation; this is an exception to what has been seen as conventional government process especially when there will be a significant impact on numerous stakeholders that span the entire provincial geography. 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.
5. This decision is incongruent with the actions of provincial and international jurisdictions who are preparing for a future changing climate. The Svalbard Global Seed Vault and the Garfield Weston Global Tree Seed Bank Project are two examples of the leadership required to adequately prepare for climate change.
6. The capacity for strategic banking of selected seed sources as "best bets" to accommodate climate change effects and to allow for assisted migration will be called into question unless a plan is in place ahead of an anticipated closure.
7. NeSMA partners suggest that the MNRF reassess and verify the information upon which the closure decision was made. While seed extraction capacity in the province may exist to accommodate the closure of the OTSP, the capacity for the frozen storage of seed in Ontario remains in question. The science-based native genetic archive mentioned in the August 23, 2017 letter informing of the closure is one area where a redefined OTSP could provide a service for existing and future clients.
8. NeSMA expects the MNRF to provide strong leadership. "*Ontario's Action Plan on Climate Change*" addresses in general terms what is needed to deal with climate change and "*Naturally Resilient, MNRF's Natural Resource Adaptation Strategy*", looks at the needs for forests in more detail. Naturally Resilient recognizes that forest managers will be challenged to ensure they will be planting trees that will thrive and produce the future socioeconomic and ecological benefits Ontarians expect from our forests. The document also recognizes the need to work in partnership with others to implement the strategy. As a partner in forest management, the NeSMA partners will look to MNRF, as others will, to provide the leadership required to implement the Strategy.

The Board of the Northeast Seed Management Association would be please to meet with you at your convenience to discuss this matter.

Yours truly,

**NORTHEAST SEED MANAGEMENT ASSOCIATION**



Paul Fantin R.P.F., President  
P.O. Box 730  
Englehart, ON P0J 1H0

cc: NeSMA Board of Directors

Bill Thornton, Deputy Minister, OMNRF [bill.thornton@ontario.ca](mailto:bill.thornton@ontario.ca)

Chris Ballard, Minister, OMOECC [minister.moecc@ontario.ca](mailto:minister.moecc@ontario.ca)

Jeff Leal, Minister, OMAFRA [minister.omafra@ontario.ca](mailto:minister.omafra@ontario.ca)

Dr. Dianne Saxe, Environmental Commissioner of Ontario [commissioner@eco.on.ca](mailto:commissioner@eco.on.ca)

Donnie McPhee, Manager, National Tree Seed Centre, NRCAN [donnie.mcphee@canada.ca](mailto:donnie.mcphee@canada.ca)

Dale Simpson, Scientist Emeritus, National Tree Seed Centre, NRCAN [dale.simpson@canada.ca](mailto:dale.simpson@canada.ca)

Steve Hounsell, Chair, Ontario Biodiversity Council [steve.hounsell@bell.net](mailto:steve.hounsell@bell.net)

Rob Keen, Forests Ontario, [rkeen@forestsontario.ca](mailto:rkeen@forestsontario.ca)

Forest Gene Conservation Association of Ontario [fgcaontario@gmail.com](mailto:fgcaontario@gmail.com)

Superior Woods Tree Improvement Association [pcharret@lakeheadu.ca](mailto:pcharret@lakeheadu.ca)

Ontario Professional Foresters Association [opfa@opfa.ca](mailto:opfa@opfa.ca)

Conservation Ontario [info@conservationontario.ca](mailto:info@conservationontario.ca)

Landscape Ontario [tonydigiovanni@landscapeontario.com](mailto:tonydigiovanni@landscapeontario.com)

Patrick Brown, Leader of the Official Opposition, [patrick.brownco@pc.ola.org](mailto:patrick.brownco@pc.ola.org)

Andrea Horwath, Leader of the New Democratic Party [ahorwath-qp@ndp.on.ca](mailto:ahorwath-qp@ndp.on.ca)

Jim Wilson, MPP [Jim.wilson@pc.ola.org](mailto:Jim.wilson@pc.ola.org)

Mayor Terry Dowdall & Council, [tdowdall@essatownship.on.ca](mailto:tdowdall@essatownship.on.ca)

Friends of the Utopia Mill & Park, Susan Antler [susan@utopia.ca](mailto:susan@utopia.ca)

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