



Ministry of the Environment, Conservation and Parks
Species at Risk Branch
40 St Clair Ave West
Toronto, ON
M4V 1M2

November 10, 2025

Re: ERO number 025-0909

The Forest Gene Conservation Association (FGCA) is submitting these comments as part of the consultation process '*Proposed legislative and regulatory amendments to enable the Species Conservation Act, 2025*'

First and foremost, the FGCA, its members, staff and board recognize the increased and increasing pressures to improve access to opportunities that strengthen and improve upon the lives and livelihoods of people in Ontario. We understand that modernization will be required to face these new challenges.

The FGCA has a vision of a genetically diverse, resilient forested landscape that supports life and a healthy economy. Our mission to ensure that genetic diversity is maintained as the foundation of a resilient forested landscape in Ontario, is well received by various businesses and stakeholders across Canada. Since 1997 we have been working together with the forest industry, conservation groups, Indigenous communities, ENGOs, nurseries and many other businesses to conserve important tree species, to enable practitioners to obtain improved seed for their reforestation or afforestation needs, supporting practitioners adapting to changes in our climate and economy, and leading knowledge exchange sessions on this important topic.

As the go-to organization for tree species recovery, sought after by research programs in North America, as well as development companies and ENGOs here at home, we are well-equipped to offer our experience and knowledge to this process you are undertaking.

We have the following comments to New Proposed Regulation Details (ERO number 025-0909) and look forward to providing additional comments to the SCA when posted officially on the ERO:

2. Regarding the requirement to work with qualified professionals, for Protected tree, woody plant and vascular forest plants, we recommend specifically referencing the Forest Gene Conservation Association to address some specific genetic conservation considerations

Specific Requirements referencing 'unhealthy Butternut or Black Ash trees' we are becoming increasingly aware of the science behind lingering individuals. With black ash we may still want to capture alleles of populations that may have both healthy and unhealthy trees

Consider additional conservation actions pertaining to gene banking and tree breeding.

4. Greater information on the commercial cultivation exemption would be greatly appreciated. The FGCA has a seed certification program that is recognized in Canada. This could serve as an excellent tool to support the use of source identified material that is of the highest quality.

5. A word of caution in the Proposed Transition Regulation- that although a permit, agreements and registration can be cancelled, there may be business arrangements in existence that would be impacted by this including some long-term 5-10 year arrangements.

Additionally, the FGCA is positioning itself to be an active partner in the conservation elements of the Act. We hope that after 28 years of strong partnership with the province that we continue to be a valued and supported partner of the Ministry of Environment, Conservation and Parks and the Ministry of Natural Resources (through our work under Forestry Futures Trust), as we navigate the new Act and the Species Conservation Program to support the health and well-being of our forest resources for many generations.

For more information, please contact the CEO of the Forest Gene Conservation Association