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Ms. Leanne Jennings
Policy Analyst
Species at Risk Branch – Species at Risk Recovery Section
Ministry of Environment, Conservation and Parks
300 Water Street North Tower, 5th Floor,
Peterborough, Ontario
K9J3C7

Submitted via email: leanne.jennings@ontario.ca

Comments on the Draft Government Response Statement to the Recovery Strategy for White-rimmed Shingle Lichen in Ontario

Dear Ms. Jennings,

Thank you for the opportunity to comment on the *Draft Government Response Statement to the Recovery Strategy for White-rimmed Shingle Lichen in Ontario*.

The Ontario Forest Industries Association (OFIA) represents 48 companies across Ontario, managing approximately 32 million hectares of Sustainable Forest License (SFL) area. Ontario's forest industry currently employs 142,000 people across all regions of the province and generates \$20 billion in revenue annually. Through various Boards and Committees, the OFIA provides a unified voice for Ontario's Forest industry with the government and the public.

The OFIA and our member companies are committed to providing a variety of habitat conditions at a stand and landscape level to promote biodiversity across Ontario, including special management actions to support species at risk and their habitats. In addition to following strict provincial regulations in forest management planning frameworks to support the maintenance of various habitats (including old and mature forest structures), many of our members also conform to voluntary third-party certification standards that include special requirements for forests with conservation value.

Upon reviewing the *Draft Government Response Statement to the Recovery Strategy for White-rimmed Shingle Lichen in Ontario*, we have concerns about the number of information gaps that remain about this species. It is essential that recovery actions be based on credible scientific information that will meet the intended outcomes of this recovery strategy and incorporates socioeconomic considerations. The following provides a review of the information presented in the supporting documentation for White-rimmed Shingle Lichen for your consideration in the development of the next steps:

Habitat Requirements:

There are several references within the [Draft Government Response Statement to the Recovery Strategy for the White-rimmed Shingle Lichen in Ontario](#), that indicate that there is insufficient data and wide knowledge gaps regarding habitat characteristics and site-specific conditions for White-rimmed Shingle Lichen:

“While the type of habitat the species occupies is generally understood, there are several knowledge gaps related to specific habitat characteristics and preferences.” (pg.3)

“White-rimmed Shingle Lichen also has several knowledge gaps related the age, size and lean angle of the host tree, tree stand age as well as the species’ preferred location on the host tree. Some of these knowledge gaps regarding habitat preference may be the key to understanding which factors limit White-rimmed Shingle Lichen’s ability to colonise a new area and influence distribution pattern. Currently it is unclear why thalli occur in such low densities and why there are significant distances between occurrences even when the habitat is considered suitable” (pg. 3)

Given the persistence of these knowledge gaps, we recommend that the Committee on the Status of Species at Risk in Ontario (COSSARO) consider listing the species as “Data Deficient” rather than “Endangered”.

Population Trends

We believe that the estimation of population trends described by the COSSARO may be sourced from survey efforts referenced within the [COSEWIC report](#), which were primarily based on the following assumptions:

*“From observation, **it is assumed that** (1) all thalli that were detected on residual trees in recently logged stands will succumb to necrosis and slough off the trees in a short time (that is, 1 to 3 years), (2) thalli in stands that were expected to be logged (based on the presence of marking tape during the surveys in 2016 and 2017) will either be directly lost or will succumb to necrosis and slough off the trees shortly after logging takes place (that is, 2 to 4 years), and (3) future losses will occur at **approximately the same rate as past ones**. Using these assumptions, losses were projected, assuming a 0.93% annual reduction in thalli for the next three generations (36 years) in all provinces, for all thalli (Table 5). The decline in the **number of thalli over the last 10 years is unknown as thalli were not generally counted prior to 2017** but simply recorded as ‘present’. For this reason, the annual loss rate of thalli is inferred using the proportion of lost sites over the last 10 years, divided by ten, that is 0.93%.” (pg. 38)*

This rationale provides an inaccurate picture of population trends because population data is based on presence/absence data and assumption statements that were subjective in nature (e.g. “it is assumed that”). Given this, we caution against using this information to inform management decisions or listing rationale.

Habitat Trends

There is no substantial evidence to demonstrate that “logging” or “wood harvesting” (i.e., forest management) is a threat to the recovery of this species, as referenced within the [COSSARO Report](#):

“Logging and wood harvesting may be a potential threat to this species. However, it is uncertain whether harvesting in marginal or wet forests is a substantial concern” (pg. 6)

If the ‘potential threat’ was based on the [COSEWIC report](#), the data source suggesting that logging was influencing habitat availability was based on “personal observations” and not credible scientific information (pg. 32). Public data sourced by the Ontario Ministry of Natural Resources and Forestry (MNRF) indicates that for the four Crown Forests surrounding Thunder Bay (near where known occurrences have been located), less than 0.1% of the total volume of cedar is harvested yearly¹. Because

¹ https://nrip.mnr.gov.on.ca/s/fmp-online?language=en_US

this species is most commonly observed on cedar trees, there is no substantial evidence to demonstrate that logging activities contribute to habitat availability.

As such, we recommend that threats specific to habitat decline (e.g., host tree/ habitat loss, habitat degradation) should not be the focus of recovery actions within the government response statement for White-rimmed Shingle Lichen, given the lack of data to support this. More information needs to be collected to better understand whether thalli would succumb to necrosis due to natural processes (e.g., forest fire, pest infestation, windthrow) and climate change impacts. Other potential effects raised within the recovery strategy that were not specific to habitat availability included effects on population caused by animal grazing (e.g., white-tailed deer and porcupine) and air quality effects, which should be further explored.

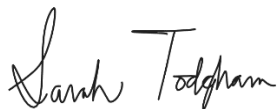
Moving Forward:

Given the amount of knowledge gaps that remain for White Rimmed Shingle Lichen population and habitat trends that persist, we would strongly encourage the Minister to form an opinion that there is a lack of credible scientific information to support the listing of White-rimmed Shingle Lichen as Endangered. In order to properly allocate resources and determine what is (potentially) required to achieve recovery of a species, further research is required to inform management decisions. To further support this recommendation, we observed that this species was proposed to be listed on Schedule 1 under the Federal Species at Risk Act (SARA) in 2020 but was not listed.

Moving forward, we would also like to encourage Minister (and COSSARO) to continue exercising the use of the classification of “Data Deficient” for species such as White-rimmed Shingle Lichen, where there are significant information gaps in the future.

We appreciate your time and consideration in reviewing our comments on the *Draft Government Response Statement to the Recovery Strategy for White-rimmed Shingle Lichen in Ontario*. Should you have any questions related to our comments included in this submission, we would encourage you to reach out to me at stodgham@ofia.com to schedule a discussion.

Best Regards,



Sarah Todgham, R.P.F.
Policy Manager
Ontario Forest Industries Association
C: 519-933-1231
E: stodgham@ofia.com