

ERO number 019-0880

Ontario's Forest Sector Strategy (Draft) (Quotes start with OFSS and are highlighted)
This is a very scary, concerning, document for anyone dependent on forests other than loggers.

OFSS Proposal summary

We are seeking feedback on the proposed Ontario Forest Sector Strategy. The goal is to sustainably grow the forest sector, create opportunity for Ontario families, support industry and encourage innovation and new investment, while ensuring the sustainability of forests.

That is a good statement provided it means all industries that are dependent on a sustainable forest. Tourism, Food foragers, Hunters, Trappers, Recreationalists, Naturalists

OFSS Proposal details

The draft strategy will support existing businesses and help create more opportunities and prosperity in northern and rural Ontario while ensuring high standards of sustainable forest management.

In developing the strategy, we listened to Indigenous, municipal and industry leaders, entrepreneurs and people from communities across Ontario who shared their ideas on the development of the strategy. It appears that you missed one of the main industries, Tourism, that is also dependent on sustainable forests, including Intact Forests, remoteness, wildlife habitats, etc.

OFSS Input received helped identify four pillars for the draft strategy, including:

These are changed from the four pillars in the **Blueprint for Success: Ontario's Forest Strategy DRAFT**. Why where significant changes were made.

OFSS (1) Promoting stewardship and sustainability

enhancing recognition of Ontario's sustainable forest management system

conducting applied research and best science to support forest management planning teams

developing and strengthening Indigenous partnerships hopefully plus other industries that depend on sustainable forests

OFSS protecting values and respecting Indigenous rights

FS Respond to climate change - preserve the limited amount of old growth forest we have left.

FS Improve collaboration in managing our forests - with other industries that depend on sustainable forests

OFSS (2) Putting more wood to work

reducing regulatory burdens for industry to access wood

increasing forest growth and use of available wood supply

investing in newer technologies to improve the quality of the inventory information

providing wood supply certainty

FS Maintain and attract new investments Be resource users, not destroyers

OFSS (3) Improving our cost competitiveness These have all changed from the **Blueprint for Success: Ontario's Forest Strategy DRAFT**

maximizing the use of mill by-products not at the expense of other users

making strategic investments in Forest Access Roads Roads need to be restricted, invest in reforestation

reviewing energy costs that would be good for all
modernizing forest management approval processes and reducing duplications' Remember other industries

OFSS (4) Fostering innovation, markets and talent

growing the talent in the sector with educational and training programs

enabling small and medium-sized businesses to access growing global export markets

increasing use of Ontario wood in construction and heating

launching the Forest Sector Investment and Innovation Program

FS Promote Fair Trade

FS Enable technology adoption

OFSS The volume of timber harvested today is less than 60% of what it was in 2000 – there is about 15 million m³ of available wood supply which could support further investment in the forest sector and allow Ontario to capitalize on future markets without impact the sustainability of our forests.

I don't believe that is the case in the Dryden Area Forests, unless it is due to the size of forests being harvest. They have gone from a 90-100 year rotation to a 30-40 year rotation. Trees cannot grow to maturity in that time. We cannot afford to have our remaining old growth areas harvested.

OFSS A strong forest sector is essential to creating prosperity for the province, especially for people in rural and northern Ontario. We are taking steps to reduce barriers that prevent businesses from taking full advantage of the tremendous potential of Ontario's forest sector while ensuring high standards of sustainable forest management. A provincial forest sector strategy will help protect existing jobs and create new ones, helping industry innovate and attract new investment and securing a future for the communities and families who depend on the industry.

It is essential that old growth, species at risk, remoteness, a wildlife habitat is protected. There is more than one industry dependent on our forests.

OFSS Public consultation opportunities

From November 2018 to May 2019, the government held seven round-table sessions across the province to gather insight from industry, municipal and Indigenous leaders. Feedback from the public and stakeholders was also collected through an online survey and via mail/email.

Industry has been engaged throughout the development of the strategy to ensure the current gaps and issues in the sector were considered and addressed. In August 2019, two meetings were held with industry stakeholders. A draft document was provided to industry representatives for feedback, which has been incorporated.

What industries have you included? This document sounds like there is only ONE INDUSTRY involved and dependent on forests.

OFSS Our stakeholder outreach strategy includes email and letters sent to municipalities, First Nations, industry leaders, including businesses with innovative uses for wood products. TOURISM! Has innovative use for the Intact Forests? Don't destroy them.

OFSS We are committed to consulting on the draft strategy and on specific initiatives as appropriate. In addition to making the draft strategy open for comments, the Ministry will consult and engage with First Nations and Metis communities on key elements of the strategy. Further consultations with community leaders and industry will be held. Remember the forests, especially old growth and intact are a valuable resource especially to a wildlife habitat, water purification, naturalists, those foraging for

berries, mushrooms, herbal medicines, etc.

A Blueprint for Success: Ontario's Forest Strategy DRAFT (Quotes start with FS and are highlighted)

I'd like to suggest that the authors of this 'Forest Strategy' have tunnel vision. It appears to be written with only one industry in mind. An industry that often can't see the forest for the trees. Trees are their focus as that is what they use for their end products.

It neglects the importance of 'the forest' for other industries and values such as carbon sinks, waters purification, remoteness, wildlife habitats (large & small, land & aquatic), etc. These values are important to other industries and the general public.

The Minister comments that "Ontario forestry industry generates over 16 billion in revenue and supports approximately 155,000 jobs" but ignores another industry that is also often dependent on forests - TOURISM - which generates more than 25 billion in revenue and supports approximately 360,000 jobs.

He praises his 'round tables'. Were those invited weighted to those in the wood business, or equally with other users such as naturalists, hunters, trappers, tourist operators and general public.

It appears the "support businesses in taking full advantage of the tremendous potential of Ontario's forest while ensuring high standards of sustainable forest management" really only means the wood businesses.

"We are committed to engaging and consulting on the draft strategy and on specific initiatives and look forward to your feedback..." I hope you will be seriously listening to the other users of the forest.

A serious consideration of the damage to the value of our forests must be given.

The old growth areas still on the landscape in the Ontario forest are already minimal and yet your government is proposing building roads and harvesting in these areas.

Old Growth Forests. The term 'old growth' refers to two separate but related concepts. A phase in the life cycle of all forests and a critical part of the functioning forest landscape. While the species composition of old growth forests may be duplicated in other forest phases, certain structural features are found only in old growth. These special structural attributes include: large trees, snags, large fallen trees and large accumulations of forest biomass. Storage of carbon, filtration of water, and capture of nitrogen are three functions carried out better in old growth than in other types of forests.

There should be no encouragement to log 'old growth forests' and try to replace them by 'vigorous' young tree farms. The unique structure and composition of old growth forest facilitate several critical ecological functions which cannot be duplicated in short rotation commercial tree farms.

Old growth literature review states: Ethically the human species does not have the right to cause the extinction of the old growth ecotype and the many species which it contains (Juday 1988)

FS KEY PRINCIPLES

Leveraging Assets	Strengthening Partnerships	Ensuring Sustainability	Fostering Innovations	Growing Markets
<ul style="list-style-type: none"> • Funding for forest restoration and road decommissioning • Appreciate and support other industries that require stability from Government to establish rules for providing services by legitimate outfitters 	<ul style="list-style-type: none"> • Work with all users and industries • Return areas to a living forest when finished cutting to be used by other industries • Others must ensure they do not damage growing trees while they use the forest so they are ready for re-harvest in 80/90 years 	<ul style="list-style-type: none"> • Decommission roads • Replant all cut over areas plus roads and landings • Consider closing deer and moose hunting seasons in reforested areas for one season • No spraying - underbrush is important to a wildlife habitat and to food crops (berries, mushrooms, medicinal herbs, etc) • Protect old-growth, it is important to the forest - the climate, water, carbon sinks, etc. 	<ul style="list-style-type: none"> • Superior logging and reforestation practices should ensure years of valuable use for all industries • Ethical use of the forests by all users will ensure the survival of all industries using the forests 	<ul style="list-style-type: none"> • Research high end wood use to ensure value for our resources • Support regulations for other businesses to ensure their sustainability (tourism, naturalists, remoteness, commercial berry and mushroom pickers, trappers, etc)

FS VISION/MISSION

Check out the Vision and Mission Statements of other forest users and realize the importance of forests to others.

Ontario's Forest Sector is a world leader in making and selling forest products from renewable sustainable and responsibly managed forests.

Ontario is a preferred location for investing in commodity and innovative forest products and advanced manufacturing.

The mission of NOTO is to enhance the quality, diversity and economic viability of the Nature and Outdoor Tourism Industry in Ontario

Since 1931, Ontario Nature has always been there for nature when it needs us most. Our vision is an Ontario where nature inspires and sustains us for generations to come. We are the voice for the protection of wild species and wild spaces in the Ontario.

Ontario Field Ornithologists

Vision

A vibrant, engaged, well informed and knowledgeable ornithological community in Ontario made up of people of various birding expertise and experience levels, who share a common passion for birds and birding.

Mission

To promote and increase the appreciation and knowledge of Ontario's avifauna and its conservation.

FS FOUR PILLARS OF ACTION

Putting More Wood to Work	Improving Our Cost Competitiveness	Fostering Innovation, Markets & Talent	Promoting Stewardship & Sustainability
<ul style="list-style-type: none"> ▪ invest in advanced remote sensing technologies ▪ remove barriers to accessing wood ▪ increase forest growth ▪ provide wood supply certainty ▪ maintain and attract new investments <ul style="list-style-type: none"> • invest in regeneration of the forests • Ensure roads densities do not impair other users • replant to ensure habitat for wildlife • provide for other users of the forest, tourism, hunting, naturalists, trapping • be resource users' not destroyers' 	<ul style="list-style-type: none"> ▪ Reduce business costs ▪ Reduce regulatory burden ▪ Make strategic investments in critical infrastructure ▪ Encourage use of underutilised species and log qualities <ul style="list-style-type: none"> • Reduce costs for other industry also - when forest company moves into an area, don't keep returning so other businesses can't use it for their benefit. Cut, reforest, decommission, leave it to grow and be used by others. • Reduce regulatory burden, but not by allowing more roads, cutting old growth and very young forests, or disregarding species at risk • Strategic investments - reforestation 	<ul style="list-style-type: none"> ▪ Promote fair trade ▪ Expand and find new markets ▪ Grow talent in the forest sector ▪ Encourage wood use and develop new innovative products ▪ Enable technology adoption <p>All good ideas provided they are completed while sustaining the forests for all users.</p>	<ul style="list-style-type: none"> ▪ Enhance recognition of our sustainable forest management ▪ Establish and strengthen partnerships with Indigenous communities ▪ Respect Indigenous rights and protect values ▪ Apply best research and science ▪ Respond to a changing climate ▪ Improve collaboration in managing forests <ul style="list-style-type: none"> • Respond to a changing climate KEEP THE OLD-GROWTH • Improve collaboration with other businesses and users in managing forests

FS Exploring Opportunities

"Ontario's forest industry is producing innovative wood products to meet current and future environmentally-conscious consumer choices which include:

FS Expanding Markets for Wood Products

"Ontario is utilizing only half of the wood that it could sustainably harvest"

Where is the wood not being harvested? In the Dryden Forests they are over harvesting. The rotation was 80-90 years, now is 30-40 years. These forests are not being allowed to mature.

What about other industries that use the forests? Tourism, (hunting, fishing, eco)

NOTO states:

Another resource that is essential to the tourism industry is the perception of remote, unspoiled wilderness. In many cases, the absence of road access and of any apparent industrial activity is an essential component of this perception. However, concern for these important values generally receives very limited attention during the planning process for forestry operations. Although the tourism and forestry industries can often resolve these concerns in an acceptable fashion for both industries, Ministry of Natural Resources decisions during the forest management planning process often appear to attach a much higher value to increased local public road access for recreational purposes than to management of forest values to maximize the combined economic value of forestry and tourism.....

The current forest management planning process has clearly demonstrated its inadequacy to address the total resource planning that needs to be undertaken in order to maximize the total resource value of Ontario's vast tracts of crown land. A comprehensive scheme for planning that addresses the needs of all of Ontario's natural resource users - forestry, mining, tourism, trapping, local recreation and others are clearly needed if we are to make the best possible resource use decisions.

FS Promoting Forestry Career Opportunities

Remember that not all careers that utilize the forests are loggers. Encourage young adults to pursue careers that will sustain our forests.

"Highlighting the vast array of career opportunities within the forest sector and building awareness that Ontario's forests are managed sustainably and responsibly can lead more young people to consider forestry as a career option." To build awareness, one must be aware of all relevant careers.

FS Sustainable Forest Management

"...forests are diverse and resilient thanks to its robust sustainable forest management system" How can you claim robust sustainable, when so much is left and not reforested.

"...recreation, biodiversity, and habitat for wildlife" These are being rapidly destroyed by poor forest management practices.

"They also support a forest industry that creates..." What do you consider the forest industry, it is more than logging.

"1. a comprehensive...guides" "2. rigorous forest...system" Hopefully for all industries using the forests

"5. Forest trusts...forest renewal" Not for road building

"6. Well-defined....indigenous communities" add and other industries

“7. Ongoing collection of forest...science” Not just information on loggable trees

“A good portion of these Crown forests are certified by more than one system” Do any of them consider any industry other than logging?

FS Pages 13 - 32

This whole section is geared at forestry with no consideration of other industries, users, or the value of intact forests. The intent appears to be slash, use and watch the mills close after they have devastated our areas. Spoiled the forest for all other users. Sad, sad, sad.