

Troy Anthony  
Ministry of Natural Resources and Forestry  
70 Foster Drive  
Sault Ste. Marie, Ontario  
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January 22, 2020

**RE: Support for ERO# 019-0715 Proposed Revisions to Forest Manuals regulated under CFSA**

Dear Mr. Anthony,

As a manager with a Sustainable Forest License located in central Ontario, I thank you for the opportunity to comment on the proposed Changes to the CFSA, ER of Ontario number 019-0715. My over-arching comment would be that I am in favor of the direction that this proposal is enabling. As a Plan Author or co-author of five forest management plans, I have personally dealt with many of the frustrations created by the group of manuals we have used. To be fair, at their core, there is good intent and has provided for a solid foundation for much of what we have accomplished as forest managers and in the world of third party certification. However, the planning process has continued to grow and, in many cases, policy makers have continued to add more and more levels of beurocracy and requirements with little hands-on experience to understand that those changes are burdensome and often not effective.

This proposal has too many components with too few details to provide an unreserved comment or statement of support but he overall language is positive. From past experience with changes to policy, I would state that a small working group of policy makers with experienced forest industry staff should be drafting the changes. Too many times policy makers draft direction and then seek confirmation from industry with reservations about significant changes. It is better to build these things together proactively.

In short though:

*FMP Preparation.*

It is sound thinking but I will put forward the caution that online commenting can be very negative and removes the professional/public interaction that information centers allow. However, the cost, effort and time for information centers has not been well served given the low participation rate in the plans I have been personally involved in nor has it for most other forests, with some notable high profile exceptions.

*Annual Notifications:*

The proposal is supportive of industry concerns that both MNRF and the public tend to view each AWS as another consultation and objection opportunity of forestry operations and thus ignores the FMP development process with its many opportunities for consultation. However, with First Nations and Metis still identified as having "consultation", there will still be a lingering uncertainty about how "approved" is an "approved forest management plan". Thought needs to be given to improve notification process for the public and stakeholder groups. For more than 20+ years, the standard official FMP and AWS notice format has proven again and again to be ineffective. Large mailing lists and newspaper ads that look more like a govt tender than about

forest management operations have been criticized in planning reviews, Local Citizen's Committees and planning teams. However, overall, this is still a positive direction.

#### *Rationalize Need for FMP, AWS and AR Tables*

Moving requirements to FIM is likely a good thing as FIM requirements may be more nimble but general improvements need to be made to ensure tables are still required and relevant. Inconsistency between planning manuals, and therefore plans, make reporting redundant, meaningless or completely out of context. Tables should also have a simplified format to facilitate table completion, possibly automatic completion.

#### *Capitalize on Modern Technology*

In keeping with the Annual Notification item, this is likely a positive thing if done correctly. If just making ineffective official notification ads available for social media, we will not have achieved much. There is a good opportunity here though to not only use modern technology but to revamp outdated formats.

#### *Extend Forest Management Plans*

This is a very positive proposal. If a plan has been approved for a 10-year timeframe with all public consultation being done, there seems little justification for much additional consultation for an 11<sup>th</sup> year compared to what could have happened in the 10<sup>th</sup> year.

#### *Reduce Requirements for Short-term Contingency Plans*

This is another positive proposal. Excessive requirements for short-term contingency plans do little except further extend timeframes to complete new plans as it draws too many resources away to create these plans.

#### *Flexibility with Bridging Operations*

Again, likely a positive step. I would like to have more details to ensue that it made sense for our forests and can be well accommodated for in the new FMP being created.

#### *Forestry Aggregate Pits*

IN the Great Lakes St. Lawrence Forest with partial cutting, numerous small blocks with different cutting schedules due to past operations, I am fully supportive of this proposal.

#### *Wood Holding Yards*

This is an excellent one and one that was pointed out as an obstacle to greater utilization in a Center For Forest Research and Innovation in the Bioenergy Economy. It also creates a huge unnecessary burden to these proposals where species at risk MIGHT be nearby as rules under the CFSA are not applied through the Land Use Permit requirements. More importantly, the delays with approvals are excessive and do not allow the benefit of these yards to be realized. However, under the CFSA, there needs to be some timeframes identified for approval to provide certainty to the forest industry when the yard can be used and provide expectations to MNRF.

#### *FMP Amendments*

FMPs are developed on a wide variety of pieces of information which can change or be different on the ground that what was expected from an inventory. If the decision is to follow a poor route

with existing direction or create a new and better route with an amended direction, the choice should be clear. So I would give full support to this item. However, we need to be careful about hard and fast rules on amendment classification without taking all aspects into consideration including size and extend of area involved, type of harvesting involved, existing access and history of operations in the area, concerns brought forward in adjacent areas in the FMP process, and many other items.

What is needed is an expected timeframe to receive approval for these plan amendments by MNR. There are numerous examples where approval times were so long that the amendments are simply avoided or opportunities to take that better route are lost. It has been my experience that changes to plans receive more scrutiny, conditions and delays than proportionally sized or expected impact operations of regularly planned areas. Amendments to plans need to be better received by MNR districts and regions. They have often been seen as a negative thing instead of positive in helping achieve better social and economic benefits.

#### *Operational Road Boundaries*

No details provided for this but sounds positive.

#### *Climate Change Considerations*

This is an important factor and there needs to be some tangible items though and certainly provide plans with greater protection from challenges from individuals and groups suggesting that plans do not adequately address climate change impacts.

#### *Species At Risk*

ERO 19-1020 is a positive step for SAR on Crown land for many reasons. However, we need species level prescriptions that are not so restrictive, that ignore social, economic and ecological benefits of forestry for all forest dwelling species and we need requirements to balance the actual threat of forestry operations. Turtles and snake species which are at risk in Ontario are not on the list because of forestry and forestry remains an exceedingly minor and low risk undertaken. However, because the main risks (persecution and road mortality on municipal and provincial roads as well as excessive development such as cottages and golf courses) often have little oversight by MNR policy, forestry activities are unfairly targeted in excessive measures.

#### *Streamline Authority to Haul Approvals*

Improvements to wood movements go beyond ATHs and should be discussed with both FRL and SFL managers to address concerns and opportunities but it is heartening to see that this subject is being addressed.

#### *Improve Clarity of Planning Direction*

This item is also very positive although more details would be required to provide much more support.

#### *Summary*

It is a very refreshing development that this current government seems to have listened to the forest industry in addressing many raised concerns through the development of the Forest Sector Strategy including the round table discussions with the Minister in 2019. There is a great

opportunity to make lasting, effective and efficient changes. I caution again that often “devil is in the details” so that forest industry representatives should be involved at the early stages of policy changes instead of being put in a reactive stage. An appeals process should be identified so that each working group is being effective.

Thank you again for the opportunity to comment on this proposal to change the CFSA and I once again offer my full support to this initiative.

Sincerely,

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