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January 31, 2020

Forest Sector Strategy - Ministry of Natural Resources and Forestry  
70 Foster Drive, Suite 610  
Sault Ste. Marie, ON  
P6A 6V5

Submitted Online via the Environmental Registry of Ontario

**Re: ERO # 019-0880 – Ontario’s Forest Sector Strategy DRAFT**

Dear Mr. Maure,

The County of Simcoe appreciates the opportunity to review and provide comments on *A Blueprint for Success: Ontario’s Forest Sector Strategy DRAFT*. Please note that the following comments are from staff only as there has not been an opportunity to date for endorsement from County Council. This response will be provided to council in due course and any subsequent resolution will be provided at that time.

The County of Simcoe has a very long and proud history in the restoration and management of our forests, and overall we are very pleased and supportive of this initiative. We recognize the many benefits from sustainably managing our forests and agree that significant opportunities exist if we can seize the opportunities arising from the many new product innovations such as engineered wood products and mass timber.

As noted in the *Strategy*, Ontario’s public (crown) forests are indeed diverse and resilient thanks to its robust sustainable forest management system. This is unfortunately not the case, however, for our crown forests south of the Area of Undertaking (AOC). In broad terms, the MNRF does not recognize and place enough value in the existing contributions, and potential for enhancements, of the forestry sector south of the AOC.

The crown forests throughout southern Ontario have not been actively managed since the passing of the *Crown Forest Sustainability Act* (CFSA) over 25 years ago. With the CFSA designed for the large crown management units in the north, the planning requirements are untenable for crown lands in the south. This, along with changing provincial priorities and staffing constraints, has led to reduced forest health, no monitoring or investment in infrastructure, and no contribution to forestry-related employment. Despite a recognition of the issue by various MNRF staff both at the district and senior policy level, and repeated offers of collaboration by existing forest managers for many years, no progress has been made.

This unfortunate and entirely preventable circumstance lies in stark contrast to the continued successes demonstrated by many community forests which have continued with the management legacy initiated in 1922 under the ‘Agreement Forest Program’. Simcoe County, since assuming full management responsibility in 1996, is today blessed with the largest municipal forest in Ontario. Simcoe County’s Forest Stewardship Council (FSC) certified forest is completely self-supporting with all revenue reinvested back into the resource. This has enabled significant investments in enhanced silviculture and continued forest restoration, invasive species management, active partnerships with users to enhance recreational opportunities and grow tourism, and the continued growth of the landbase and

protection of natural heritage features. The annual sustainable harvest conducted in the Simcoe County Forest contributes substantially to the thousands of direct jobs created by the forest industry in this region as detailed in your *Strategy*.

The following comments are purposely brief and are provided only where a specific suggestion is warranted. They also align with the government's priorities of red tape reduction, job creation, and promoting economic growth and prosperity - while not requiring investments at the provincial level.

#### Putting More Wood to Work

- *Remove Barriers to Accessing Wood*

Enable the active management of crown forests south of the AOC by:

1. Modifying the CFSA to reduce the existing planning requirements
2. Working with municipalities to conduct the land use planning which is required to identify crown parcels which should be considered for management
3. Enabling opportunities to work with existing forest managers (municipalities, conservation authorities, first nations) to enhance efficiencies
4. Fostering innovation by considering various options including partnership agreements, land exchanges or sales

#### Promoting stewardship and sustainability

- *Enhance recognition of Ontario's sustainable forest management system*

One of the long-standing objectives of the Simcoe County Forest is to demonstrate the benefits of sustainable forest management to the public. Simply by practicing what it preaches within crown forests in the south, the province could significantly enhance awareness and recognition of these benefits within a highly populated area.

Again, we fully support the intent and objectives of the draft *Forest Sector Strategy* and are willing to work collaboratively with the province and other partners to help achieve the many benefits for our environment and economy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Graeme Davis', with a stylized flourish at the end.

Graeme Davis, RPF  
County Forester

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