

February 18<sup>th</sup>, 2020

John Sullivan  
Crown Forests and Lands Policy Branch  
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**Re: ERO Number 019-0715: *Proposed Revisions to the Forest Manuals Regulated Under the Crown Forest Sustainability Act***

Thank you for the opportunity to comment on ERO Number 019-0715, *Proposed revisions to the Forest Manuals regulated under the Crown Forest Sustainability Act*. For 77 years, the Ontario Forest Industries Association (OFIA) and its members, including forest practitioners, sustainable forest license (SFL) managers, biologists and technicians, have dedicated their careers to sustainable forest management. Today, our membership responsibly manages over 20 million hectares of Crown and private forests in Ontario and contributes to the 155,000 jobs and 16 billion dollars in revenue, generated by the provincial forest sector.

On March 7<sup>th</sup>, 2016, OFIA provided a response to the draft 2017 Forest Management Planning Manual (FMPM). Additionally, in several letters addressed to MNRF staff and the Minister, OFIA expressed disappointment towards the development and unveiling (shared with broader industry) of the draft 2017 FMPM. We are pleased however, that through significant changes in MNRF's approach to engagement with industry, the establishment of the Forest Management Planning Advisory Group (FMPAG), and a collaborative mindset taken by MNRF managers and industry representatives; the process of FMPM development has improved considerably.

OFIA's expectation is that all Ministry of Natural Resources and Forestry (MNRF) policy initiatives currently being developed under the umbrella of a Provincial Forestry Strategy should align with these principles:

1. Reduce red tape and administrative burden to the forest sector.
2. Make Ontario a more competitive jurisdiction through reduced costs (e.g. delivered wood costs, etc.).
3. Support current operations by providing consistent, reliable, and affordable access to wood fibre.
4. Explore opportunities for increasing the sustainable use of Ontario's Crown forests to support growth in the forest sector.
5. Ensure consistent implementation of existing government policy between all levels within the MNRF: Policy Division, Forest Industry Division and Regional Operations Division.

The OFIA is generally supportive of all proposed revisions that were described in this proposal, including changes to forest management plan preparation, annual notification of scheduled operations and

individual plan approvals, rationalizing the need for Forest Management Plan, Annual Work Schedule, and Annual Report Tables.

Similar to our response to ERO 019-0961: *Proposed amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario*; OFIA maintains that MNRF, as the Crown, should remain responsible for the duty to consult with Indigenous groups throughout the planning process. Industry can provide and share information but cannot comment or review. Additionally, we are concerned that SFL managers and other industry representatives will be charged with added risk and responsibilities, following proposed revisions. Such changes could add significant costs, potential complications, and future delays to the forest sector which is inconsistent with the objectives of the Forest Sector Strategy.

In general, revised manuals should:

- Place a higher emphasis on professional reliance; both on Industry registered professional foresters (RPFs) through submission certification, and MNRF RPFs through alteration certification.
- Make use of the Forest Information Manual and its technical specifications to house policy and enable responsiveness to change.
- Remove requirements for approval that are not necessary (e.g. change of AWS to submission only, with no MNRF approval required).
- Provide details of phase-in provisions, particularly with respect to the Silvicultural Implementation Direction, when the policy is ready to be implemented.

The OFIA supports the work of industry participants on the FMPAG and their specific, technical recommendations to the MNRF and looks forward to ongoing updates on this file.

Sincerely,



Ian Dunn, RPF  
Director of Forestry and Environmental Policy  
Ontario Forest Industries Association