

February 18th, 2020

Nick Baggs
Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 400
Sault Ste. Marie, ON
P6A 6V5

Submitted via email

RE: ERO Number 019-1006: Proposed revisions to Ontario's Independent Forest Audit Regulation under the Crown Forest Sustainability Act

Thank you for the opportunity to comment on ERO Registry Number *019-1006: Proposed revisions to Ontario's Independent Forest Audit Regulation 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, by balancing social, ecological, economic and cultural forest values.

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 supportive of proposed amendments to Ontario's Independent Forest Audit (IFA) Regulation that seek to improve transparency, enhance the flexibility of audit schedules and

reduce total program costs and workload for forest industry. Transitioning to a 10-year audit cycle and adopting a risk-based approach to protocol application, will enable government to streamline program delivery, without reducing the effectiveness of the provincial monitoring program. Additionally, we are confident that the proposed revisions will have no impact on forest sustainability or Ontario's world class forest management practices and plans.

Forest management in Ontario is guided by a rigorous legislative and policy framework that has long demonstrated world-class effectiveness and outcomes. The OFIA and its members are confident that this trend will continue. For example, a report authored by the Ministry of Natural Resources and Forestry (MNRF) found that 93% of all Independent Forest Audits (IFA) from 2009-2013, complied with the law, government standards, operational practices and forest policy in Ontario¹. This outstanding track record of compliance, paired with exhaustive monitoring programs that are already undertaken by forest industry (i.e. depletion mapping, internal reviews, forest operations inspection program and third-party certification audits), ensures forest management activities will continue to meet the objectives outlined in forest management plans². To conclude this submission, OFIA and its members reiterate their support for the proposed revisions to the IFA Regulation and maintain that they will continue to manage Ontario's forests sustainably and responsibly.

I would be happy to discuss any of these points in further detail with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Duckett', with a long horizontal stroke extending to the right.

Cameron Duckett
Forestry Policy Advisor
Ontario Forest Industries Association

References:

1. Ontario Ministry of Natural Resources and Forestry. 2016. State of Ontario's Natural Resources: Forests 2016. Queen's Printer for Ontario. Toronto, ON. 36 p.
2. Ontario Ministry of Natural Resources and Forestry. 2014. Forest monitoring. Queen's Printer for Ontario. Toronto, ON.