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

Dear Mr. Baggs,

Timiskaming Forest Alliance Inc. (TFAI) and its shareholder companies (forest industry and First Nation shareholders) would like to thank you for opportunity to comment on ERO Registry Number 019-1006: Proposed revisions to Ontario's Independent Forest Audit Regulation under the Crown Forest Sustainability Act.

TFAI has been responsible for the successful forest management of approximately 1 million hectares in Northeastern Ontario for over 25 years. This submission represents TFAI's 25 years of experience and knowledge managing and conserving this renewal resource across a large landscape.

TFAI'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.

TFAI is generally 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 look forward to working with your government to improve the effectiveness of species at risk policy and ensure a balanced approach between a healthy environment and economy. These changes have the potential to significantly reduce administrative burden, costs, and business uncertainty while ensuring a continued commitment to the highest standards of sustainable forest management.

I would be happy to meet with you at your earliest convenience to discuss the best path forward to ensuring positive outcomes for species at risk while keeping people in Northeastern Ontario working.

Sincerely,
TIMISKAMING FOREST ALLIANCE INC.



Yves Vivier, R.P.F.
General Manager of TFAI

cc

Minister John Yakabuski, Ministry of Natural Resources and Forestry
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks
Jamie Lim, President & CEO, Ontario Forest Industries Association
TFAI Board of Directors