



February 18th, 2020

John Sullivan
Crown Forests and Lands Policy Branch
Roberta Bondar Place Suite 400
70 Foster Drive
Sault Ste Marie, ON
P6A 6V5

SUBJECT: ERO Number 019-0715: *Proposed Revisions to the Forest Manuals Regulated Under the Crown Forest Sustainability Act*

Dear Mr. Sullivan,

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 Number 019-0715, Proposed revisions to the Forest Manuals regulated 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 has previously expressed significant concerns regarding the development and unveiling of the draft 2017 FMPM, however we are pleased that progressive changes in MNRF's approach to engagement with industry, including the establishment of the Forest Management Planning Advisory Group (FMPAG) and the subsequent collaborative approach adopted by MNRF managers and industry representatives, has lead to a significantly improved process of FMPM development.

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 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.

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.

TFAI supports the work of industry participants on the FMPAG and their specific, technical recommendations to the MNRF and looks forward to ongoing oversight from this group during manual implementation.

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