

**February 18, 2020**

Jennie Weller  
Environmental Assessment and Permissions  
135 St Clair Avenue West  
1st floor  
Toronto, ON  
M4V1P5

Submitted Online Via the [Environmental Registry of Ontario](#)

**RE: Comments on Proposed Amendments to General Regulation 334 under the Environmental Assessment Act: ERO# 019-0961**

Dear Ms. Weller:

Thank you for the opportunity to comment on the proposed amendments to General Regulation 334 under the Environmental Assessment Act as described on the Environmental Registry of Ontario posting number 019-0961.

Rayonier Advanced Materials (RYAM) is a leading manufacturer of forest products – lumber, paper pulp, paper and specialty cellulose pulp. Our operations in Ontario include sawmills in Cochrane, Kapuskasing, Hearst, Chapleau and Huntsville and a newsprint mill in Kapuskasing. We employ over 1,200 Ontario residents directly and utilize the services of dozens of small and medium-sized businesses across the province.

Our operations are integral to the Northern Ontario economy and have a long history of creating jobs, growth, and prosperity for the communities in which we have operated, in some cases, over 90 years.

RYAM supports initiatives put in place to find efficiencies and reduce unnecessary duplication in Forest Management Planning and modernizing approval processes. As such, RYAM supports the government's intention to modernize the Environmental Assessment (EA) process which aims to remove duplication between the EA Act requirements and the Ministry of Natural Resources and Forestry's (MNR) policies, regulations and guidelines.

Specifically, we support the elimination of the Individual Environmental Assessment (IEA or bump up – T&C 26) process currently entrenched within the Forest Management Planning (FMP) process. The current issue resolution process that precedes the IEA bump-up process is rigorous enough to ensure that stakeholder disputes are appropriately addressed within the FMP process.

The current IEA bump-up process causes major delays for FMP approvals (in some cases over 2 years) and results in an unnecessary administrative burden for both the MNRF and forest industry.

RYAM also supports the streamlining of the process for MNRF to be able to make amendments to the Declaration Order MNR-75 (T&C 58). The current process seems overly onerous and unwieldy for both the MNRF and MECP and discourages timely changes to the Dec Order.

RYAM does however have concerns that some of the requirements included in the current Declaration Order MNR-75 may or may not be adequately addressed by MNRF's proposed changes to the forest policy framework, regulated forest manuals or supporting forest policy, programs and procedures. Specifically, we have concerns that a number of the Dec Orders as listed below may not yet be adequately addressed;

- Condition 38 requiring MNRF to continue to implement a Provincial Wildlife Population Monitoring Program within the AOU.
- Condition 40 requiring MNRF to continue to prepare a State of Ontario's Forests Report and ensuring the reports are publicly available.
- Conditions 42 and 43 requiring MNRF to continue to maintain committees (ie. Provincial Forest Policy and Forest Technical committees) to ensure that input on MNRF's policies and programs is sought and received from a range of stakeholders external to the MNRF.
- Condition 44 requiring MNRF to continue to ensure that MNRF guides are reviewed and updated as set out in the requirements of the condition
- Condition 45 requiring MNRF to maintain a program of scientific studies to assess the effectiveness of the MNRF Guides and to continue to support a science program to investigate the role of forests in climate change and efforts towards climate change mitigation.
- Condition 47 requiring MNRF to continue to develop and maintain information management systems to support forest management planning.
- Condition 48 requiring MNRF to maintain an Ecological Land Classification Program and in particular continuing to improve inventory and mapping technologies and to provide for technology transfer and training programs.

- Condition 49 requiring MNRF to continue to support and implement a provincially coordinated Growth and Yield Program. The current program has essentially been on life support for the past 5 years and requires attention. The MNRF attempt to download this requirement on industry under the guise of Performance Assessments is not supported by RYAM.
- Condition 52 requiring MNRF to continue to maintain data systems and analytical methodologies for use in forest management planning and reporting.
- Condition 53 requiring MNRF to continue to provide professional and technical training programs including the forest operations and compliance inspectors program and the certified tree marker and certified scaler licensing program.
- Condition 54 requiring MNRF to continue to provide public education on Forest Management including collaborating with organizations involved in the administration and delivery of educational programs in forest management.
- Condition 56 requiring MNRF to continue to support District Managers who conduct negotiations at the local level with Aboriginal Peoples in order to identify and implement ways of achieving a more equal participation by Aboriginal Peoples in the benefits provided through forest management planning. This obligation cannot be replaced by tenure modernization (eSFL process) or solely by the forest industry. MNRF has an important role to play at the local level including having Aboriginal People directly employed by the MNRF in local District offices.

Thank-you for providing the opportunity to comment on the proposed amendments to regulation 338. We support the governments efforts to streamline approvals and to remove duplication. In so doing, we continue to seek assurances that the government will maintain important requirements that support forest stewardship and sustainability in Ontario.

Sincerely,



Michel Lessard  
Vice President, Forestry Operations, Canada  
Rayonier Advanced Materials

Cc Minister John Yakabuski, Ministry of Natural Resources and Forestry  
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks