

MAZINAW – LANARK FOREST INC.

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February 13, 2020

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

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

Re: Support for Proposed Revisions to the Forest Manuals regulated under the Crown Forest Sustainability Act, ERO# 019-0715

Mr. Sullivan,

Mazinaw-Lanark Forest Inc. is a small, cooperative SFL in Southern Ontario with shareholders representing sawmills, a group of independent loggers and a pulp mill. Our shareholders are principally independent, family owned businesses whom have been operating on Crown land for generations. Our shareholders have broad representation in the communities within and surrounding the SFL boundaries. Over 785 people are employed by these operations and are dependent on wood produced from the forest.

As the general manager of Mazinaw-Lanark Forest Inc., thank you for the opportunity to comment on the Proposed Revisions to the Forest Manuals regulated under the Crown Forest Sustainability Act, Environmental Registry of Ontario number 019-0715. I am writing to you today to express support for this proposal. I also participate as an industry member on the Forest Management Planning Advisory Group (FMPAG).

Mazinaw-Lanark Forest Inc. is currently preparing a Forest Management Plan to be implemented April 1, 2021 developed under the 2017 Forest Management Planning Manual (FMPM). We are supportive of proposed changes to the manuals that will allow for short-term efficiencies in forest management planning. Further we wish to express support for the following initiatives described in this proposal.

- We support efforts to remove unnecessary process and streamline documentation for the following:
 - individual environmental assessments during forest management planning
 - the review and approval of the Annual Work Schedule by MNRF
 - Placing FMPM tables in the FIM technical specifications to enable more responsive change
 - Enabling approval of wood holding yards in the forest management plan will save our shareholders businesses time and money.
 - Clarifying the classification of forest management plan amendments to ensure consistency and more expeditious processing.

- We ask that that the primary responsibility for duty to consult with First Nation and Metis Communities be assigned to MNRF throughout the planning process.
- We support proposed changes to allow for more flexibility to permit operations to proceed under a forest management plan extension or a short-term contingency plan
- Enabling more flexibility to bridge harvest areas from an already approved forest management plan to the next will allow our shareholders to maximize on their planning investment and reduce wood costs.
- We support the proposal to extend the timeframe for forestry aggregate pits. This proposal aligns better with our partial harvest silviculture practices on our forest and will save our shareholders businesses time and money.
- Allowing flexibility to plan operational road boundaries appropriately will reduce the need to amend the forest management plan and reduce wood costs.
- Support the streamlining of Authority to haul documents will reduce burden and operating costs to our company and our shareholders. We also continue to advocate for one harvest approval for the term of the issued forest resource license as a means to further reduce administrative burden and disruption of operations at the end of the fiscal year.
- We continue to emphasize the role professionals play in the planning process and encourage MNRF to draft policy that allows professionals to apply their local knowledge and judgement in forest management.

We also wish to emphasize that we are not supportive of the current policy for silviculture enhancement initiative (SEI) as currently included in policy and the associated draft technical documents. We ask the ministry to ensure phase-in provisions exempt Forest Management Plans from this direction until a SEI policy can be developed that is better reflective of the realities of managing Mazinaw-Lanark Forest.

I also wish to highlight the need to ensure the ministry undertakes an initiative to ensure that policy is being interpreted and implemented consistent with approved policy. There is a risk that due to the level of change being proposed, roll-out of this policy will be inconsistent and in turn the objectives of this policy proposal will then not be fully achieved.

Mazinaw-Lanark Forest Inc. feels that the proposed changes in this notice will reduce process and allow our company to focus more of our resources on managing the forest and ensuring its sustainability.

Sincerely,



Matt Mertins, RPF
General Manager
Mazinaw-Lanark Forest Inc.

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