

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 345/794  
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Ms. Jennie Weller  
Environmental Assessment and Permissions Branch  
Ministry of Environment, Conservation, and Parks  
135 St Clair Avenue West, 1st floor  
Toronto, Ontario  
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Dear Jennie:

Subject: ERO #019-0961 Proposed amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the proposed amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario and offer the following comments for consideration.

While the OFAH understands and supports the desire to reduce the duplication between the Environmental Assessment Act (EAA) and the Crown Forest Sustainability Act (CFSA), we have concerns about the potential ramifications of the approach being taken. Currently, Crown land forestry planning must follow the environmental assessment process that is outlined in Declaration Order MNR-75. This declaration order exempts forestry operations from preparing an environmental assessment as per the requirements of the EAA and instead provides its own set of conditions that forestry operations must meet. The proposal seeks to eliminate the declaration order, because the conditions it lays out are generally already incorporated in the Forest Management Planning Manual (FMPM) which forest operators are legislated to follow as per the CFSA. The 2013-2018 Five-Year Environmental Assessment Report on Forest Management indicates that the declaration order takes too long to amend when required, citing an instance where it took five years to review and approve an amendment. If the environmental assessment requirements for forestry operations were only housed in the FMPM, then necessary amendments could be approved much more quickly and efficiently. We agree that necessary amendments should not take five years to approve; however, the same process that allows for faster amendments could be used to loosen environmental assessment requirements. Removing important environmental considerations from legislation and putting them in policy is concerning. As such, the OFAH wants to ensure that any public consultation for amendments to the FMPM includes exact wording changes in order to provide the public with adequate information to make meaningful comments.

In addition to ensuring adequate public comment, environmental requirements must not be lost as a result of the transition from the declaration order to the FMPM. For example, the FMPM includes information on requesting an individual environmental assessment; however, the process for administering the request is only outlined in the declaration order. These individual environmental assessments allow for a person to request that a specific planned operation under the forest management plan is subject to an environmental assessment. If the declaration order no longer applies, would this ability be rewritten in the FMPM?

In conclusion, the OFAH supports the intent to remove unnecessary duplication, but we want to ensure that all conditions in the declaration order not currently covered through CFSA requirements are transferred to an appropriate place in the forest management planning process.

Thank you for considering these comments.

Yours in Conservation,



Lauren Tonelli  
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish and Wildlife Services  
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