

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Mr. Nick Baggs
Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 610
Sault Ste. Marie, Ontario
P6A 6V5

Dear Nick:

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

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 revisions to Ontario's Independent Forest Audit Regulation under the Crown Forest Sustainability Act and offer the following comments for consideration.

This proposal seeks to extend the period of time between independent forest audits (IFA) for forest management units from five years to ten years. The minister will still be permitted to extend the audit period, but the proposal does not indicate if the extension period will continue to be a two-year maximum. Among other things, the purpose of independent audits is to assess how well forest activities comply with the Crown Forest Sustainability Act (CFSA) and the Forest Management Planning Manual (FMPM); compare the planned forest management activities with on-the-ground action; and determine if sustainable forest management is occurring. Compliance monitoring through independent auditing is not only important for ensuring sustainable forest management, but also to help increase public confidence and secure social acceptance of forest management activities. As the government is currently looking to add more regulatory power and processes to the CFSA and FMPM in the form of harmonization with the Endangered Species Act and the Environmental Assessment Act, compliance is more important than ever. As such, the OFAH cannot support extending the length of time between IFAs as proposed.

Monitoring and reporting on objectives are important tools to ensure that forest operations are following all required legislation and policies, but also in determining whether or not those policies are having their intended outcomes. Information gathered by the audits should be informing the development of the next Forest Management Plan (FMP) or if immediate action is needed in the form of an amendment. Under the proposed ten-year audit period and the potential for ministerial extension, a forest management unit could avoid having an audit for an entire FMP, as they normally also have a ten-year lifespan. Maintaining a shorter period between IFAs would ensure that every FMP is audited at least once.

Thank you for considering these comments.

Yours in Conservation,

Lauren Tonelli
Resource Management Specialist

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager, Policy
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