

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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E-MAILED
09/30/14

Ms. Rachel Hill
Acting Sustainability Assurance Coordinator
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 400
Roberta Bondar Place
Sault Ste. Marie, Ontario
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Dear Ms. Hill:

Subject: EBR Registry Number 012-2384: Independent Forest Audit Modernization: Key Policy Proposals

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 720 member clubs, we have reviewed the key policy proposals for the Independent Forest Audit (IFA) Modernization. We have identified some concerns with the audit modernization, and have provided additional considerations below.

Risk Based Approach to Audit Scope

The OFAH understands the intent of streamlining the IFA system using a two-stage risk-based approach; however, we question the utility of the Stage 1 – Broad Assessment for Public Review and Understanding. If the initial assessment is too broad, with minimal detail, there is a risk that the public may not get the full understanding of the project status, accomplishments, and rationale for the Stage 2 detailed assessments. We understand the risk-based approach, and the requirement to use a narrow scope to investigate and report on areas with the greatest potential impact; however, we caution that a shift to reporting just non-compliances may lead to an unbalanced report, which could fuel the sometimes negative stigma surrounding sustainable natural resource harvesting in Ontario. We suggest that operator compliance and best practices continue to be identified and reported in the audit report.

Short, Balanced Audit Reports

The OFAH supports the modification of audit reports to make them shorter and less complex. We agree that a short balanced text and table of all the recommendations/findings would make the reports less cumbersome and complex. However, considering that typical audit reports range from 35-200 pages, the OFAH questions how these will be turned into the proposed 7-10 page reports. The OFAH cautions that by making the report into a 7-10 page summary, it may not contain sufficient information to support the findings/recommendations. We caution that implementing a separate “technical document” may cause confusion for the public, and may actually make the reports more cumbersome and complex. The OFAH supports making the audit reports public at the same time the audit report is released. We suggest that the audit reports be released to the public in a timelier manner than the current trend of one-two years after report completion.

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Extend Frequency Reviews to 10 Years

The OFAH has concerns with the proposal to shift mandatory program reviews from every five years to 10 years. We understand the goal is to better align the audit cycle with the new 10-year forest management planning cycle; however, we suggest that the impacts of non-compliance after 10 years will be much harder to mitigate and repair compared to identifying and addressing concerns after five years. The OFAH would consider supporting the shift to 10-year IFAs for forest units that are certified to acceptable Sustainable Forest Management Standards (SFM) (e.g. Canadian Standards Association [CSA], Forest Stewardship Council [FSC], Sustainable Forestry Initiative [SFI], etc.) as these certifications often have annual audits to verify SFM practices. Any uncertified forest should be kept on a five-year IFA cycle.

Adjust Auditors Wording

The OFAH understands the difficulty for auditors to definitively report on the achievement of forest sustainability, however we do not agree with the rationale provided "*that the audit occurs at a point in time and sustainability by definition is a long-term concept.*" We suggest that the audit should be the "point in time" that the management of the forest is analysed based on the "long-term" history of forest operations. We are unsure of what the distinction is between the two statements, how can a forest be managed consistent with "principles of sustainable management" without the "achievement of forest sustainability"? We suggest that the two statements are intrinsically linked and an adjustment to the wording unnecessary.

Audit Recommendations vs Findings

The OFAH understands that sometimes the proponent may be in a better position to determine the appropriate actions to remedy audit non-compliance; therefore, we support the change from "audit recommendation" to "audit findings" in the audit report. However, we are concerned with the proposal to change the auditor's comments on licence extension to comments on the licence compliance. It is our understanding that the main legislative strength behind the IFA is the ability to withhold forest licence extensions. Considering that the proposed change from "extension" to "compliance" requires a change to the Ontario Regulation 160/04, would this have an impact on the ability for the auditor to recommend withholding forest licence extensions?

Corporate Action Plans

The OFAH disagrees with the proposal to defer audit recommendations/findings directed at corporate MNRF to "the appropriate policy development/review cycle." The OFAH believes that corporate MNRF should be subject to the same process, accountability, and timelines as the licensee to address audit recommendations/findings. The OFAH would require more information and rationale before we could support this proposed change.

Removing Low Risk Procedures

The OFAH supports the proposal to remove low risk procedures; however, they must have to be proven (not perceived), to have "no direct bearing" on sustainable forest management. The OFAH supports the efforts to streamline the IFA audit process. We suggest that all of the audits, approvals, and plans for Ontario's forests be reviewed and analysed to identify information gaps and reduce duplication.

In conclusion, the OFAH supports the efforts to streamline the IFA audit process; however, we caution that audit reports should not become overly vague or too short. We suggest that forest units already certified for sustainable forest management standards could be candidates for a 10-year IFA audit cycle extensions. We express concerns of the impacts to the strength of the IFA after suggested alteration to Ontario Regulation 160/04, and suggest that the MNRF should be held to the same standards/timelines as the other auditees in the IFA.

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The OFAH appreciates the opportunity to review and provide comments of the proposed policy changes for the IFA modernization. We look forward to future opportunities for discussion and collaboration to strengthen the IFA in Ontario.

Yours in Conservation,



Chris Godwin
Land Use Specialist

CG/gh

cc: OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff