

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Mr. John Sullivan
Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Dr, Suite 400
Sault Ste Marie, Ontario
P6A 6V5

Dear John:

Subject: ERO # 019-0715 Proposed revisions to the Forest Manuals regulated 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 the Forest Manuals regulated under the Crown Forest Sustainability Act and offer the following comments for consideration.

The OFAH agrees that public access to forest management planning information should be improved through greater use of modern information technology such as websites, social media, and email. However, these methods should be used in addition to in-person information centres rather than in place of them. Many individuals do not have access to online sources and limiting access to this information to these sources would prevent those groups from contributing. The OFAH is also concerned about the proposal to "reduce duplication of requirements related to consultation opportunities" and "remove the process for requesting an individual environmental assessment." The proposal does not explain what consultation requirements are duplicative or how reducing those requirements will affect consultation opportunities. Under the suite of current forestry-related Environmental Registry (ERO) proposals, many environmental considerations (such as environmental assessments and species at risk) will be incorporated into the forest management planning process and, therefore, opportunities for public consultation should be maintained (if not enhanced). Similarly, in the OFAH's response to ERO posting #019-0961 (*Proposed amendments to General Regulation 334 under the Environmental Assessment Act to remove Regulatory Duplication of Forest Management requirements in Ontario*), we recommend that the process for individual environmental assessments is written into the Forest Management Planning Manual to ensure it is not lost.

The proposal also suggests removing forest management planning information notices from the ERO and distributing that information via social media and email instead. Many people rely on the ERO as a "one-window" approach to accessing information related to the environment. The OFAH wants to stress the importance of ensuring that information is accessible to the greatest number of Ontarians, and that means maintaining the use of multiple platforms, including the ERO.

There are several aspects of this proposal that relate to extending timelines and creating more flexibility in planning. There is already a mechanism to extend Forest Management Plans (FMPs) by two years, but this proposal is looking to liberalize the requirements for an extension and find more opportunities to extend FMPs. Why are additional extensions, over and above the existing two years, required? The OFAH understands the desire to add flexibility to allow for carry over harvest from one FMP to the next as these harvest plans would already be approved; however, we would like to ensure that the public can still offer comments on the carry over harvest during the consultation period for the new FMP to ensure that any new and relevant information is incorporated into decision-making.

The proposal also looks to remove the 10-year time limit for forestry aggregate pits and allow for the forest industry to plan for wood holding yards through FMPs instead of permits through the Public Lands Act. The OFAH is concerned about the implication of potentially removing Crown land from public use indefinitely. The Public Lands Act includes considerations that go beyond forest management planning and those should still be included when determining where wood holding yards are permitted.

There are many other changes included in the proposal that lack adequate detail to be able to provide meaningful feedback, including modification of various definitions, climate change considerations, and species at risk changes. We respectfully recommend the MNRF post the specific draft changes to the four forestry manuals to the ERO for public consultation to allow for more informed input.

Thank you for considering these comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
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Matt DeMille, OFAH Manager, Fish and Wildlife Services
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