

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

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*Ontario Conservation Centre*

OFAH FILE: 345/794

March 11, 2022

Ms. Karry Anne Campbell  
NDMNR - CFLPB - Forest Planning Policy Section  
70 Foster Drive, Suite 400  
Sault Ste Marie, Ontario  
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Dear Ms. Campbell:

Subject: ERO # 019-4922 Proposed regulatory changes under the Crown Forest Sustainability Act for the harvest of Crown forest resources for personal use

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 regulatory changes under the Crown Forest Sustainability Act for the harvest of Crown forest resources for personal use and are supportive.

A number of the proposed personal uses of Crown forest resources are already allowed, but people must obtain authorization on a district-by-district basis from the Ministry of Northern Development, Mines, Natural Resources, and Forestry (NDMNR). However, the process to find the appropriate NDMNR district that is responsible for approving the collection of firewood, and then actually obtaining approval, is time-consuming and, in many cases, unnecessary. Also, there are many people who believe these activities are already legal. By including these activities in regulation provides clarity to individuals about what they can do in regards to Crown forest resources and removes an unnecessary administrative barrier to a low-risk activity. It also imposes reasonable maximums on the quantity of forest resources that can be gathered by an individual, which could have been being exceeded when it was assumed that these were legal activities. This has the potential to reduce the amount of Crown forest resources removed from the landscape through this activity.

Allowing the personal harvest of forest resources for firewood is extremely important for Crown land camping, hunting, and fishing, especially when considering that the most common alternative is to bring in outside firewood that may result in the movement of invasive forest pests. The most effective way to ensure that your firewood does not spread invasive species is to burn it where it is collected. Regulating the ability to do this without cumbersome authorizations should increase the likelihood that people will use locally collected firewood. Outdoor recreationists require the ability to make fires for a host of reasons including warmth, cooking, and animal deterrence. This is not just for survival or comfort, but also an important social factor; anglers often enjoy having a shore lunch to cook what they have just caught, and often this is done over an open fire. Allowing individuals to collect downed or dead wood makes it significantly easier for these fires to take place.

While the OFAH supports the proposed changes, we have some questions about potential environmental impacts. The OFAH would like to be sure that the maximums are ecologically sound and will not result in the loss of significant amounts of habitat. The annual collection maximum is set at 10 cubic metres of downed wood, transplanting up to five small trees per year, cutting of two Christmas trees up to 2.5 m, and cutting up to five small standing White Birch with a diameter of 10 cm or less at a height of 1.4 m. How were these limits determined? Additionally, why was it determined that when Crown land camping or carrying out other recreational activities that individuals could cut standing dead wood? Currently, there are requirements for forestry companies to leave a number of dead standing trees for the purpose of habitat, so are there any associated concerns with allowing these trees to be cut for the purpose of firewood? While it is unlikely that this regulation change will actually impact the amount of wood being personally removed from Crown land, we want to ensure that the NDMNRF has considered the potential localized effects.

Overall, this proposed regulation will provide a benefit to anglers, hunters, and campers who recreate on Crown land; however, we advise that the local ecological impacts of the removal of this volume of wood be considered and monitored. Thank you for considering our comments.

Yours in Conservation,



Lauren Tonelli  
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors  
OFAH Land Use/Access/Trails Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Director, Policy & Programs  
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