

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 345/794
September 19, 2022

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SUBJECT: Review of the implementation of Ontario's Independent Forest Audit Regulation (319/20) 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 ERO Bulletin 019-5315 *Review of the implementation of Ontario's Independent Forest Audit regulation (319/20) under the Crown Forest Sustainability Act* and provide the following comments for consideration.

Ontario's forest management sector generates tremendous benefits for the provincial economy but also has broad benefits for wildlife habitat and the outdoor recreation sector. Due to the influence that silviculture practices have on the creation and removal of certain species and habitats, the OFAH wants to ensure that forest management companies are following the established guidelines and the approved forest management plan, and that adherence to the guidelines is generating wildlife habitat as predicted.

In 2020, the OFAH expressed our opposition to the government's intent to extend the audit period from 5 years to 10 years. Combined with the possibility of ministerial extension, a forest management unit could avoid having an audit for the entire duration of the FMP, as they normally also have a 10-year lifespan. The government nonetheless forged ahead with lengthening the audit period and it is therefore crucial to impose robust and transparent auditing requirements.

Among other things, the purpose of independent audits is to assess how well forestry activities comply with the Crown Forest Sustainability Act and the Forest Management Planning Manual, compare the planned forest management activities with on-the-ground action, and determine if targets for forest sustainability have been met. The Forest Management Planning Manual (FMPM) states that the FMP will "include documentation as to how the FMP has regard for plant life, animal life, water, soil, air, and social and economic values, including recreational values and heritage values." Indicators of particular interest to the OFAH and our members include the amount habitat for forest-related species (including SAR), compliance with management practices that protect water quality and fish habitat, total area sprayed with herbicides, and the length and distribution of forest access roads. The 2011 IFA Review stated that "The Ministry should consider enhancing the IFA process by reviewing how the issue of sustainability is to be addressed in the IFA process to ensure that all legislative requirements are met." Can you please provide us with a description of the steps taken by the Ministry since the 2011 review to address that recommendation?

Compliance monitoring through independent auditing is not only important for ensuring sustainable forest management, but also to help increase public confidence and garner social acceptance for forest management activities. Anglers and hunters see first-hand the results of forest management activity and must be reassured that resource extraction is benefitting fish and wildlife and their habitats. Recently, there has been considerable attention on the impacts of aerial herbicide spraying in forest management and its impact short- and long-term impacts on wildlife habitat, particularly from moose hunters. The *Independent Forest Audit Process and Protocol* outlines several requirements related to aerial spraying (e.g., conformity with Annual Work Schedule, public consultation opportunities, etc.) but we are not aware of any requirement to assess the short- and long-term impacts of spraying on wildlife habitat.

Given the potential for aerial spraying to have a significant negative impact on wildlife and wildlife habitat, the government should consider establishing a public-facing, science-based method of assessment in the independent audit process. Inclusion of this assessment in the audit report would help inform Crown forest users of the impacts of aerial spraying.

Thank you for considering our comments. We look forward to participating in a future review of the Independent Forest Audit process, should the Ministry choose to proceed.

Yours in Conservation,



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Manager of Policy

MR/jb

cc: OFAH Board of Directors
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