

November 15th, 2019

Peter Henry, Section Manager
Forest Guides and Silviculture Section, Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 400
Sault Ste. Marie, Ontario
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Submitted via email.

Re: EBR Registry Number: 019-0452 Proposed update to Ontario's Tree Seed Transfer Policy

Thank you for the opportunity to comment on EBR Registry Number *019-0452, Proposed update to Ontario's Tree Seed Transfer Policy*. For over 75 years, the Ontario Forest Industries Association (OFIA), the provincial trade association for Ontario's forest sector, has provided a unified voice for a diverse membership of companies that operate in all regions of the province. Our members remain committed to sustainable forest management by balancing social and environmental values with economic development, while facilitating longstanding relationships with various stakeholders and rightsholders.

OFIA's expectation is that all Ministry of Natural Resources and Forestry (MNRF) policy initiatives currently being developed under the umbrella of a Provincial Forestry Strategy should align with these principles:

1. Reduce red tape and administrative burden to the forest sector.
2. Make Ontario a more competitive jurisdiction through reduced costs (e.g. delivered wood costs, etc.).
3. Support current operations by providing consistent, reliable, and affordable access to wood fibre.
4. Explore opportunities for increasing the sustainable use of Ontario's Crown forests to support growth in the forest sector.
5. Ensure consistent implementation of existing government policy between all levels within the MNRF; Policy Division, Forest Industry Division and Regional Operations Division.

Upon review it appears that implementation of this policy could come at a significant added cost to industry and forest managers through new tracking, planning, collecting and extracting requirements. Furthermore, there is inherent risk and potential liability placed on SFL holders who will remain responsible for achieving renewal targets regardless of transferred seed or planting stock success. We believe this deserves further discussion and we look forward to ongoing communication through the development and finalization of this policy.

With these issues in mind, the OFIA does support an updated Ontario's Tree Seed Transfer policy that seeks to ensure the sustainability and health of Ontario's forests in response to a changing climate. Managed forests in Ontario, particularly in the boreal region, are vulnerable to an increasing mean annual temperature (Johnston 2009) and are projected to be at high risk by 2050 (Joyce & Rehfeldt 2017). Updated site-based guidelines for seed transfer are projected to minimize the risk of maladaptation and should be adopted into future forest management plans. A modernized policy that encourages the use of climate-adapted tree seed for suitable growing environments will help facilitate resilient forest ecosystems and a sustainable wood supply in Ontario.

Under 'Existing policy and opportunities for change', the proposal mentions the forest sector's need for policy that "reflects current operational contexts such as the expanded Area of the Undertaking, changed roles and responsibilities and administrative boundaries". The Area of the Undertaking (AOU) is a well-established, legal boundary that defines where forest management can take place in Ontario. We are not aware of any work being done to re-evaluate or revise the boundaries of the current AOU. More clarity is needed on this item, and we would be happy to discuss this at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Duckett', with a long horizontal stroke extending to the right.

Cameron Duckett
Forestry Policy Advisor
Ontario Forest Industries Association

References:

Johnston, M. (2009). *Vulnerability of Canada's tree species to climate change and management options for adaptation: An overview for policy makers and practitioners*. Canadian Council of Forest Ministers.

Joyce, D. G., & Rehfeldt, G. E. (2017). Management strategies for black spruce (*Picea mariana* (Mill.) BSP) in the face of climate change: climatic niche, clines, climatotypes, and seed transfer. *Forestry: An International Journal of Forest Research*, 90(4), 594-610.