

# *MAZINAW – LANARK FOREST INC.*

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January 20, 2020

Troy Anthony  
Ministry of Natural Resources and Forestry  
70 Foster Drive  
Sault Ste. Marie, Ontario  
P6A 6V5

Submitted Online Via the [Environmental Registry of Ontario](#)

**RE: Overwhelming Support for ERO# 019-1020, *Proposed Changes to the Crown Forest Sustainability Act, 1994***

Dear Mr. Anthony:

Mazinaw-Lanark Forest Inc. is a small, cooperative shareholder SFL in Southern Ontario with shareholders representing sawmills, a group of independent loggers and a pulp mill. Our shareholders are principally independent, family owned businesses whom have been in business for generations on Crown land. Our shareholders have broad representation in the communities within and surrounding the SFL boundaries. Over 785 people are employed by these operations and dependent on wood produced from the forest.

As the general manager of Mazinaw-Lanark Forest Inc., thank you for the opportunity to comment on the *Proposed Changes to the Crown Forest Sustainability Act (CFSA)*, Environmental Registry of Ontario number 019-1020. I am writing to you today to express overwhelming support for this proposal. Given that the current regulation under the ESA expires this year, I ask that this proposal be approved and finalized as soon as possible. There can be no further delay on this item.

Mazinaw-Lanark Forest Inc.'s support for these changes is contingent on the finalized language containing no additional conditions, restrictions, or requirements, beyond what is already contained within the CFSA or O. Reg. 242/08 under the Endangered Species Act (ESA). While removing this duplication is a critical and essential first step, species at risk prescriptions contained within existing forest management guidance continues to limit access to a renewable and sustainable supply of timber. Current prescriptions in place take a 'no-risk approach and thus are needlessly onerous and restrictive for the industry. Species at risk are common in our forest so these prescriptions have a large effect on our ability to manage the forest due to the widespread restrictions on our operations. MNRF also provides us with values data late and thus we have little time to adapt to new restrictions being placed on us throughout the year.

The CFSA already provides landscape, stand, and site-level direction for managing, conserving, and protecting species at risk. Having two acts attempting to accomplish the same outcome represents the single greatest piece of red tape and duplication to this sector. While a permanent, legislative change to the CFSA is an essential and important first step; in order to unleash the full potential of the sector, improvements need to be made to forest management guidance (e.g. landscape guides and the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales) delivered under the CFSA.

We understand that MNRF is currently undertaking a review of forest management guidance and manuals and expect the finalized products to:

1. Consider the impacts of climate change on species at risk habitat.
2. Evaluate the cumulative impacts of species at risk policy on a healthy economy.
3. Contribute to functioning ecosystems and working landscapes.
4. Undertake, share, and consider socio-economic impact analysis.

Mazinaw-Lanark Forest Inc. looks forward to working with your government to improve the effectiveness of species at risk policy and ensure a balanced approach between a healthy environment and economy. This change to the CFSA has the potential to significantly reduce administrative burden, costs, and business uncertainty while ensuring a continued commitment to the highest standards of sustainable forest management.

I would be happy to meet with you at your earliest convenience to discuss the best path forward to ensuring positive outcomes for species at risk while keeping people in this province working.

Sincerely,



Matt Mertins, RPF  
General Manager  
Mazinaw-Lanark Forest Inc.

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CC Minister John Yakabuski, Ministry of Natural Resources and Forestry  
Minister Jeff Yurek, Ministry of Environment, Conservation and Parks  
Jamie Lim, President & CEO, Ontario Forest Industries Association