



August 11, 2023

Tara Pettit
MNRF – CFLPB - Forest Planning Policy Section
70 Foster Drive
Sault Ste. Marie, Ontario
P6A 6V5

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

RE: Proposed Revisions to the Forest Management Planning Manual ERO# 019-6823 regulated under the Crown Forest Sustainability Act.

Dear Ms. Pettit:

Thank you for the opportunity to comment on the proposed revisions to the Forest Management Planning Manual (FMPM) regulated under the Crown Forest Sustainability Act (CFSA), Environmental Registry of Ontario number 019-6823.

GreenFirst Forest Products is a forest-first business, focused on sustainable forest management and lumber production. The Company owns four sawmills located in rich wood baskets proudly operating over 6.1 million hectares of FSC® certified public Ontario forestlands (FSC®-C167905). The Company believes that responsible forest practices, coupled with the long-term green advantage of lumber, provide GreenFirst with significant cyclical and secular advantages in building products. Our operations in Ontario include sawmills in Cochrane, Kapuskasing, Hearst, Chapleau and a newsprint mill in Kapuskasing. Our operations are integral to the Northern Ontario economy and have a long history of creating jobs, growth, and prosperity for the communities in which we have operated, in some cases, for over 90 years.

We have had the opportunity to review the proposed changes in the FMPM and wish to express our general support for many of the proposed revisions to the FMPM in particular those that make further improvements to Ontario's Forest management planning process and those that contribute to achieving the goals outlined in Ontario's Forest Sector Strategy.

Based on a review of the FMPM by our forestry staff we offer the following input/comments.

- GFFP supports the move to spatial modeling provincially. GFFP (formerly Tembec and RYAM) has utilized a spatial model for the development of the last two rounds of FMPs on GFFP managed tenures. Based on GFFP's experience we agree that a spatial modeling approach provides a more accurate visual representation of the forest, the improved ability to demonstrate the structure and composition landscape guide indicators and a more operationally feasible harvest allocation. Given the significant change in modeling approach being implemented across the province, the Ministry will need to ensure that MNRF staff supporting FMPs are adequately trained and that quality training and supporting materials are developed and delivered in a timely manner to FMP planning teams.
- Industrial Wood Requirements (Part A 1.1.8.12): GFFP supports the inclusion of the new requirement in the FMPM requiring the Ministry Forest Industry Liaison Officers to serve as plan advisors and to assist with the development of appropriate wood supply targets by the planning team and the modeling and analysis task team. It will be important to stress during training that projected industrial wood requirements will be considered when establishing the targets for each indicator consistent with the definition of sustainability.
- Selection of Planned Harvest Areas (Part A 1.2.7.1): GFP is encouraged to see that the area for salvage and low-volume stands will not be counted against the planned harvest area. This will help encourage the utilization of stands affected by natural disturbances and low-volume stands. The source(s) of Ministry direction for identifying low volume stands (e.g., *Report of the Forest Accord Item #11 Committee to the Ontario Forest Accord Advisory Board, March 2000 ?*) should be appropriately referenced in the FMPM. In addition, amendments should be made to the Scaling Manual to eliminate the need to pay Crown stumpage on salvage harvest areas.
- Values Information (Part B 2.1.4.3): GFFP seeks clarification on how MNRF will go about confirming the existence of old growth stands. Is this intended to only identify stands of old red and white pine or will stands of other species also be mapped? It appears the new process may lead to a lot more stands being identified as old growth. Detailed criteria to define old growth will need to be agreed upon, which may be difficult to achieve without further clarification/training.
- Roads (Part A 1.1.8.10): GFFP supports the proposed existing roads definition as it should significantly reduce the number of roads and road networks where low grade or winter roads are being used extensively such as areas within the clay-belt. GFFP also supports the additional flexibility included in the FMPM enabling the use of existing roadbeds which will help reduce the amount of new disturbance and loss of productive forest area.
- Determination of the Proposed Management Direction (Part A 1.2.5.2): GFFP questions whether the proposed timelines allowed for the combining of stages two (LTMD) and three (Review of Proposed Operations) are realistic given GFFP past experience. We are not convinced that this change will result in any appreciable reduction in the time needed to develop an FMP. MNRF needs to review the proposed timelines and ensure they are realistic.

- Tactical Planning – Spatial Harvest Schedule (Part A 1.2.5.2): GFFP staff are concerned about the potential expectations for “Tactical” planning. The current FMPM is not clear about what level of information will be needed to complete "Tactical" planning for term 2, 3 and 4. This could involve significantly more workload particularly for larger management units. The FMPM needs to further clarify what level of Tactical planning information will be required or not required for terms 2, 3 and 4 or ensure that the expectations are clearly communicated during FMP training.
- Tactical Planning – Spatial Harvest Schedule (Part A 1.2.5.2) The removal of the ability to show Preferred and Optional Harvest Areas during the new Stage 2 (Review of Proposed Management Direction for the FMP) is concerning. We still need the ability to select eligible areas for harvest not selected by the spatial model to account for stakeholder issues/concerns, Indigenous values/concerns and forest inventory and values information errors. Not being able to select eligible replacement areas that have not been selected by the model at this stage would be a mistake. If we don't show alternatives (i.e., optional or eligible harvest areas) and the planned harvest shown at Stage 2 needs to be changed, how will that be dealt with in regard to public consultation?
- Contingency Area (Part A 1.3.3.2) There should be flexibility to be able to select contingency areas even if they have not been selected by the model for T2.
- Harvest Areas (Part B 4.3.1) Same comment as noted above, there should be the ability to select other eligible stands that have not been selected from the spatial harvest schedule. There is sometimes the need, for a variety of reasons, to select other eligible stands that have not been selected by the model when completing operational planning. Such flexibility should be retained.
- Water Crossing Construction (Part D 3.2.3.1): It would be logical for the Ministry to allow some movement of water crossing installation locations (i.e. outside the 200 m identified) with a change to operations, in particular where an applicable water crossing standard identified in the FMP will be implemented. This would be consistent with the direction for crossings being changes to operations when an unmapped stream is encountered. This would reduce the burden of preparing and submitting AWS revisions.
- Operational Standards for Forestry Aggregate Pits (Appendix III): The term "ponding" must be properly defined on the basis of size, function, duration and intent. Given that excavation work in Forestry Aggregate Pits (FAPs) can be undertaken below the water table, there must be more details outlined in the operational standards to deal with situations where work is occurring below the water table while equipment is actively extracting aggregate from a FAP. The wording in the current operational standards does not work for some management units (e.g., Gordon Cosens Forest) in the clay belt where aggregates sources are rare and the water table is at or near the surface.

Our Company remains committed to working with Ontario and the Ministry of Natural Resources and Forestry in the shared vision of improving forest management planning and seeking additional opportunities to reduce administrative burden, cost and business uncertainty while ensuring the continued pursuit of high standards of sustainable forest management.

We look forward to continuing constructive dialogue with the Ministry, Indigenous groups, local communities, resource professionals, and all stakeholders to achieve this important objective in a practical way.

Sincerely,

A handwritten signature in blue ink that reads "Chris P. McDonnell". The signature is written in a cursive style with a large initial 'C'.

Chris McDonnell R.P.F.
Chief Forester
GreenFirst Forest Products

Cc Minister Graydon Smith, Ministry of Natural Resources and Forestry