



January 16, 2020

Re: Comment to EBR posting ERO #19-1006

Thank you for providing an opportunity to comment on the proposed changes to Ontario's Independent Forest Audit Regulation under the CFSA. Monitoring the SFL obligations and FMP commitments along with the effectiveness of MNRF policies and their application are key functions of the Independent Forest Audits. We recognize the importance of IFAs for continuous improvement of both forest management and governance policies and actions.

These proposed changes will reduce the effort and cost to SFL holders and MNRF by reducing the frequency of audits especially for those SFLs that are certified and receive annual audits by independent certification bodies which monitor compliance to laws and regulation.

These proposed changes will align the IFA process with the forest management plan process and provide for timelier sharing of audit results with the public. It is important to use enhanced annual reports to eliminate the need for separate trends analysis. Improvements to the monitoring of the resulting actions to address the recommendations might be considered for the period between audits.

A further improvement would be the elimination of a financial review of the Renewal Trust Fund. Currently all records are sent to the MNRF with each invoice for funds from the Renewal Trust Fund. The specified procedure to do the financial review is a redundant and costly activity.

Again thank you for the sharing of information. We appreciate the current momentum to reduce regulatory burden and cost for the forest industry.

Sincerely,

Janet Lane, RPF
SFL Leader