

February 4, 2020

Subject: Ontario's Forest Sector Strategy: Request for Feedback

ERO Number: 019-0880

Attention: Ministry of Natural Resources and Forestry

Dear Sirs

We write in response to your call for comment on the Forest Sector Strategy issued December 4, 2019 by the Ministry of Natural Resources and Forestry of Ontario.

In summary we applaud the effort and direction of this document and strategy, and its various tactics and objectives. The ideas and policies presented are worthwhile, well-constructed and thoughtful proposals.

Our only comment is in respect of the permitting regime for areas north of the Area of the Undertaking.

**Background:**

The area north of the Area of the Undertaking is governed by the Far North Act, while the Area of the Undertaking is governed by the Crown Forests Sustainability Act. In that latter area, the permitting regime is guided in part by the fact that harvesters are either small wood lot operators or large industrial forest products enterprises. The permitting regime for large industrial harvesters is, rooted in historical commercial precedence, well established and guides much of the permitting approach to crown forests and users. Because of that history and a robust understanding of industry's needs, an existing environmental assessment of the Area of the Undertaking allows forests users to prepare a forest management plans under the auspices of such EA, in time frames that are congruent with large, long lead commercial imperatives.

This is not the case with the area known as the Far North. As no area wide EA has been undertaken for the Far North Area, the permitting and regulatory regime for users in that area is far more undeveloped. Because of this lack of commercial regulatory precedence for the region even small development initiatives require that communities first undertake a land use plan, which in the past has been as large as 2,500,000 hectares, (an area measuring 100 kms by 250 kms). For communities with 300 people, this is a simply impossible task. Since no approvals have been given for land use plans since 2011, the challenges of this policy are evident. This lack of pragmatic regulatory framework effectively condemns these communities to zero access to the forest resources, which we believe is antithetical to the policy intent of the Forest Sector Strategy. Indeed, the only groups that



could afford to even consider commercial activities in the Far North are large enterprises, which means the playing field is neither leveled in terms of access nor opportunity.

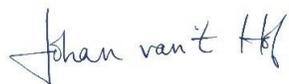
***Proposed Approach:***

We suggest significant consideration be given to the urgent development of a pragmatic regulatory regime for small users (under an aggregate impact area of 10,000 hectares) in the Far North. Doing this would avoid the need for a prohibitively expensive land use plan of several hundred square kilometers which would allow smaller, “right sized”, development to take place in the region. We suggest a competent forest management plan and EA for such an area that is appropriately scaled to meet the public interest in terms of stewardship of public resources, while achieving the government goals of making things better, faster, quicker and simpler.

In short, the Far North Act, as it currently stands, serves as a comprehensive and compelling impediment to the proper use of Crown forest resources in the Far North. While an appropriate permitting regime is being developed, we suggest it would be warranted to issue ministerial directives for forestry projects that meet the filter criteria laid out the Watay transmission line ministerial directive, in order to exempt compliance with the current Far North Act land use provisions.

Yours very truly,

**Mitigokaa Development Corp.**



JC van 't Hof, CPA CA

Chief Executive Officer

