



OFAH FILE: 794
October 16, 2024

Erin Buckley
Crown Forests and Lands Policy Branch
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 400
Sault Ste. Marie, Ontario
P6A 6V5

Subject: ERO 019-8983: Updating the Independent Forest Audit Process and Protocol

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 700 member clubs. We have reviewed ERO posting 019-8983, Updating the Independent Forest Audit Process and Protocol, and offer the following comments for consideration.

As an organization, the OFAH's interest in forestry revolves around our goals of sustainable Crown forest management, providing for healthy fish and wildlife populations, and the creation of opportunities for sustainable, recreational activities. In the past, our comments on the Forest Audit process have been chiefly aimed at improving transparency and accountability.

The stated purposes of ERO 019-8983 are to address administrative details, to clarify roles and responsibilities between the Ministry and the Forest Futures Trust Committee to remove overlap and redundancy and to clarify audit procedures. From our perspective, the proposal appears to achieve that objective.

However, the OFAH is concerned about ongoing monitoring and follow up by the local MNR office between IFAs. In the Review of the implementation of Ontario Regulation 319/20: Independent Forest Audit under "5. Information Used to Support IFA Audits", it states the following:

- a. *annual report requirements are no longer being enforced by the ministry which results in:*
 - i. *insufficient data being provided to auditors to conduct their work*
 - ii. *a lot of time spent by auditors in following up on missing information for each individual annual report, rather than performing the actual audit.*
- b. *the Enhanced Annual Reports do not align very well with the audit period creating more difficulty in assessing some of the audit objectives (that is, assessment of utilization by area and volume, levels of renewal and tending, expenditure) and creating additional work for the auditees and auditors to gather the required data.*

c. *background information used to develop the audit sample is from Geographic Information System (GIS) shape files, however these files never match what is in the Annual Reports.*

d. *Silvicultural Effectiveness Monitoring (SEM) data is often incomplete or unavailable and the lack of standards for reporting is also problematic.*

We recommend that annual report requirements be enforced, and that non-compliance issues and findings identified in IFAs be followed up and reported on in a timely manner. It is our understanding the yearly annual reports are not reviewed by the MNR, although they do review the Enhanced Annual Report after 5 to 6 years. We encourage the Ministry to ensure the Action Plan prepared by the forest company or SFL following the IFA is being implemented effectively. Considering the overlap between a given project's second Enhanced Annual Report and the next IFA period, the current system is likely insufficient for addressing non-compliance. It is a long time between IFAs and staff turnover can further complicate follow-up after 10 to 12 years.

We agree with the proposed change that all procedures in the IFAPP be mandatory. This reduces the probability that most if not all optional procedures will be omitted. The risk assessment protocol should continue to be monitored.

We are grateful for the opportunity to comment on this topic and look forward to collaborating with the Ministry in the future.

Yours in Conservation,

A handwritten signature in dark ink, appearing to read 'Matthew Robbins', written in a cursive style.

Matthew Robbins
Fish & Wildlife Biologist

cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Matt DeMille, OFAH Executive Director
Angelo Lombardo, OFAH Executive Advisor
Mark Ryckman, OFAH Manager, Policy