

Disclosure:

The following comments have been written for one of the communities affiliated with Nokiwin.

It is not confirmed if the following details coincide with the views or opinions of all communities affiliated with NTC.

Comments:

We appreciate the opportunity to provide feedback on the proposed revisions to the Independent Forest Audit Process and Protocol. Our community has a deep and enduring connection to the land, and sustainable forest management is crucial to preserving our cultural heritage, environmental health, and economic well-being. We recognize the importance of independent forest audits in ensuring that Ontario's public forests are managed sustainably and in accordance with Indigenous rights.

Our comments focus on several key areas of the proposed changes:

1. **Enhanced Involvement:** The inclusion of local Indigenous representatives in the field audit is a positive step towards more inclusive and comprehensive audits. However, it is important to consider the availability and capacity of Indigenous communities to participate. Ensuring adequate support and resources for these communities will be essential to make this implementation successful and not overly burdensome.
2. **Extended Audit Cycle:** While aligning the audit cycle with a 10-to-12-year period may streamline processes, it raises concerns about the monitoring and enforcement of Indigenous land and resource rights. Extended intervals between audits could lead to gaps in oversight, potentially overlooking critical aspects of Indigenous land stewardship and resource use. Extending the audit cycles for Independent Forest Audits (IFAs) could potentially harm Indigenous resource rights for several reasons:
 - **Reduced Oversight and Accountability:** Longer intervals between audits can lead to reduced oversight of forest management practices. This can result in delayed identification and correction of practices that may harm Indigenous lands and resources. Continuous and frequent audits are essential to ensure that forest management practices comply with legal and environmental standards, protecting Indigenous rights to land and resources.
 - **Increased Risk of Environmental Degradation:** Extended audit cycles could mean that environmental degradation or unsustainable practices go unnoticed for longer periods, potentially allowing for prolonged and/or irreversible damage to lands and resources. For example, if improper logging practices are not identified and corrected promptly, they could lead to significant soil erosion and sedimentation in nearby water bodies. This can degrade water quality, harm aquatic habitats, and disrupt the ecosystem services that Indigenous communities rely on.
 - **Weakened Enforcement of Indigenous Rights:** Regular audits help enforce Indigenous land and resource rights by ensuring that forest management practices

respect these rights. Longer gaps between audits could weaken this enforcement, leading to increased instances of rights violations and reduced opportunities for Indigenous communities to hold forest managers accountable in the event of mismanagement.

- **Lack of Timely Data and Feedback:** Frequent audits provide timely data and feedback on the state of forest management, which is crucial for adaptive management practices. Indigenous communities need this information to make informed decisions about their land and resources. Extended audit cycles could result in outdated or insufficient data, hindering effective management and decision-making.
- **Diminished Community Involvement:** Regular audits often involve consultations with Indigenous communities, providing them with a platform to voice their concerns and participate in forest management. Extending the audit cycle could reduce these opportunities, leading to decreased community involvement and empowerment in managing their lands and resources.

In summary, extending the audit cycles could undermine the protection and enforcement of Indigenous resource rights by reducing oversight, increasing the risk of environmental degradation, weakening rights enforcement, providing outdated data, and diminishing community involvement. Regular and frequent audits are essential to ensure sustainable forest management that respects and upholds Indigenous rights. Given that some communities already feel under-informed about the audit process and how to get involved, extending the time between audits could exacerbate this issue. It is crucial to ensure continuous and transparent communication to mitigate these concerns.

3. **Role Clarifications/Changes:** Clarifying roles and responsibilities is essential for effective management, but it is important to ensure that this does not lead to gaps in oversight or accountability. The redistribution of responsibilities should be clearly communicated and should aim to enhance consultation opportunities for Indigenous communities and stakeholders within each management unit. Clear delineation of roles can help ensure that all parties understand their responsibilities and can contribute effectively to the audit process.
4. **Implementation:** The proposed procedural changes, such as focusing more on results rather than processes and making all audit procedures mandatory, have both positive and negative implications. While a results-oriented approach can drive better outcomes, it is important not to overlook the processes that ensure thorough and fair audits. The mandatory status for all audit procedures and increased time for auditors to prepare draft reports are positive changes that can enhance the quality of audits. However, it is important to balance these changes to ensure that the process remains comprehensive.

In conclusion, while the proposed revisions have the potential to improve the Independent Forest Audit Process and Protocol, it is most crucial that the frequency of audits is not extended.

Maintaining regular and frequent audits is essential to address the concerns of Indigenous communities, ensure continuous oversight, and support sustainable forest management effectively. Extending the audit cycle could undermine these goals by reducing oversight, increasing the risk of environmental degradation, weakening rights enforcement, providing outdated data, and diminishing community involvement. Therefore, the audit process frequency should remain as it is to uphold the integrity and effectiveness of forest management in Ontario.