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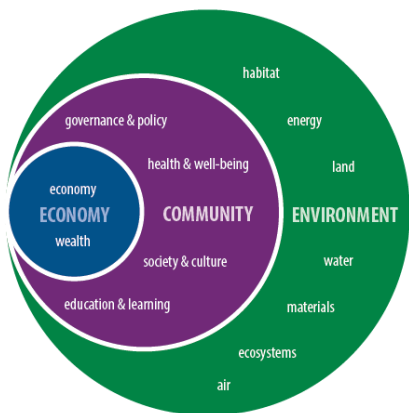
**Proposed revisions to Ontario’s Independent Forest Audit Regulation under the Crown Forest Sustainability Act: ERO 019-1006**

**Introduction**

[BurlingtonGreen Environmental Association](#) is a citizen-led, nonpartisan, registered charity in the City of Burlington. We are pleased to submit our comments on the *Proposed Revisions to Ontario’s Independent Forest Audit Regulation under the Crown Forest Sustainability Act: ERO 019-1006*. BurlingtonGreen regularly provides comments and recommendations to the government on issues pertaining to environmental protection and environmental policy. We believe that all levels of government must work to protect Canadians against the growing threat of our climate change and species extinction.

**Climate Change and Our Forests:**

Climate change is the biggest challenge facing Ontarians. To achieve progress on climate action, climate change mitigation must drive all government decision-making. This calls for a complete transformation of the current decision-making framework, placing climate action as a top priority. A shift from the traditional framework to one that prioritizes our impact on the environment is necessary. A nested circle framework recognizes that social and economic activity occurs within ecological limits.



*Photo credit: Future Oxford Community Sustainability Plan*

BurlingtonGreen recognizes the economic contribution of the forest sector to the Province’s economy. At the same time, we are facing new climate realities. The Intergovernmental Panel on Climate Change’s (IPCC) most up to date recommendation is a 50% carbon reduction by 2030 and achieving

carbon neutrality by no later than 2050. Should we fail to meet our GHG emission commitments, we are just 10 years away from natural tipping points and runaway climate change. Now is not the time to sweep environmental checks and balances under the carpet.

### **The Threat to our Species and Habitats**

A critical ecological issue we are currently facing is what scientists have termed a sixth mass extinction of plants and animals on Earth. But unlike past extinctions, this one is being caused by human activity. According to the [Centre for Biological Diversity](#), “as many as 30 to 50 percent of all species are possibly heading toward extinction by mid-century”, and since “most of biodiversity's benefits take place at a local level, conserving local populations is the only way to ensure genetic diversity critical for a species' long-term survival”. This means that wherever we are thinking of introducing human activity, such as logging, it is vital that a comprehensive environmental impact assessment be completed to determine whether any at-risk species are involved, before approval is given on a proposed project.

Now more than ever before, it is critical that we ensure the need of the forest sector for growth is governed within the parameters of responsible environmental stewardship in order to achieve a truly sustainable model for this sector.

### **BurlingtonGreen Comments on the Proposed revisions to Ontario’s Independent Forest Audit Regulation under the Crown Forest Sustainability Act: ERO 019-1006:**

While this proposal makes the assertion that the proposed increased “flexibility” of the auditing framework would not have negative environmental consequences, there are no supporting facts to back this up. When climate change is already causing negative consequences, and when science is telling us that its impacts will become both more severe and more frequent, this is not the time to allow extensions of audit periods beyond the current mandatory 10 years, nor should audit reports to the legislature be replaced by postings on a public website. While we support the posting of reports in the public domain, we nevertheless believe that our elected representatives must continue to take responsibility for reviewing them and exercising appropriate oversight on behalf of Ontarians, particularly since these audits monitor licence holders (i.e. private sector organizations) as well as the Ministry.

### **The Need for Stronger and More Meaningful Public Consultation**

In the face of the growing climate crisis, the government must engage in a robust and transparent consultation process with Ontarians to ensure that the public’s priorities and feedback are heard and considered. The recent [Auditor General’s Report](#) on the Environment highlighted the government’s shortcomings with regards to consulting the public on decisions with potential impacts on our environment<sup>1</sup>. The report indicated that half of the proposal notices posted by the Natural Resources, Municipal Affairs, and Energy and Mines ministries in 2018/19 “did not adequately describe important aspects of the proposal, such as the environmental implications” (page 34).

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<sup>1</sup> [Ontario Nature Blog](#)

## Conclusion

We urge the Government of Ontario to put forward a sustainable, forward-looking strategy for managing our forests that carefully balances support for our industries and communities with improved, not weakened, conservation opportunities. This must be coupled with carefully considered and appropriate improvements, where needed, to the legislation, policies and processes designed to support and implement a forest strategy. By no means should changes include the elimination of audit reports by the Ministry to the legislature. At no other time has it been so vital that our elected representatives be aware of environmental performance indicators.

We must ensure that the systems and resources designed to support our forest sector recognize the threats facing our species and work to address them, and that audit and reporting requirements ensure full disclosure and transparency. It is time to acknowledge the need for and a commitment to a sustainable future for all, and a shift from a “Business as Usual” model that is unsustainable to a model that prioritizes action on climate and species preservation, thereby safeguarding the health and well being of our habitats and biosphere, now and for future generations.

Sincerely,

BurlingtonGreen Advocacy Team  
BurlingtonGreen Environmental Association

CC: Jane McKenna, MPP, Burlington  
John Yakabuski, Minister of Natural Resources and Forestry