



June 9, 2008

John Stevenson, Secretary  
Ontario Securities Commission  
20 Queen Street West  
Suite 1900, Box 55  
Toronto, Ontario M5H 3S8

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Ontario Securities Commission  
SECRETARY'S OFFICE

Dear Mr. Stevenson,

**Re: Proposed Repeal and Replacement of Multilateral Instrument 52-109**

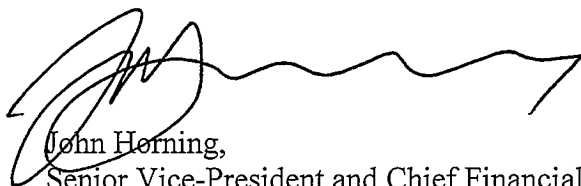
The following comments are in response to the Proposed Repeal and Replacement of Multilateral Instrument 52-109 Certification of Disclosure in Issuers' Annual and Interim Filings.

The latest proposal has an effective date of December 15, 2008, which requires Interfor's certifying officers to certify on the effectiveness of internal controls over financial reporting at the end of this current financial year. The comment period expires on June 17, 2008 resulting in the adoption date being August, at the earliest.

To comply with this proposal within this timeframe, forces companies to commit significant scarce resources without knowing when or if this proposal will be adopted. We feel that this expectation is unreasonable based on the unpredictable evolution of this instrument. Even with this commitment, the timing presents significant resource challenges to plan and perform the work required. Postponing the effective date to 2009, would allow time for the final release of Multilateral Instrument 52-109. This in turn would ensure companies would understand the final requirements and would allow sufficient time to carry out a more comprehensive planning process and to commit the available resources in a cost effective manner.

We therefore request that the effective date of the proposal, if adopted, be changed to a date in 2009.

Yours truly,



John Horning,  
Senior Vice-President and Chief Financial Officer

International Forest Products Limited

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