

Department of Development &
Property



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Joe Maure
Forest Sector Strategy - Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 610
Sault Ste Marie, ON
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Submitted Online Via the Environmental Registry of Ontario

Re: Feedback and Support for Ontario's Forest Sector Strategy, ERO# 019-0880

Dear Mr. Maure,

Thank you for the opportunity to provide comments on Ontario's Forest Sector Strategy. The forest sector is essential to the communities of Renfrew County. There are approximately 6,900 people in Renfrew County directly or indirectly employed by the forest sector. The businesses that receive wood from forests in Renfrew County are family-owned, some having been in operation for 5+ generations. They are critical to the survival of our communities, and have demonstrated that sustainable forest management is a way of life here – and hope it will continue to be for many more generations to come.

We agree that Ontario's forest sector has yet to reach its full potential, and applaud the Ministry of Natural Resources and Forestry (MNRF) for undertaking the development of a Forest Sector Strategy that aims to reduce barriers and costs, promote economic growth and create jobs, while still leading the world in the sustainable forest management. We hope that these goals will be realized in Renfrew County. We would like to offer the following feedback and ideas for action that could be included in the final version of the Forest Sector Strategy.

Feedback on the Four Pillars of Action as Described in the Draft Forest Strategy

1. Putting More Wood to Work

It may be beneficial in the final Forest Sector Strategy to flush out some of the issues that keep actual harvest areas so far below available harvest levels (p.19 of the Strategy) and identify solutions for these issues. We have outlined some of the major obstacles in Renfrew County that must be overcome to achieve this pillar, with suggested solutions.

Species at Risk

Significant harvest area has been lost, or become too costly to access due to Species at Risk restrictions, resulting in an estimated \$1.50-\$2.00/m³ added cost to producing forest products¹. Approximately 30% of the productive forest land base on Crown lands in Renfrew County has some form of Species at Risk restriction on regular operations².

On forest lands owned and managed by the County of Renfrew, we also experience issues related to Species at Risk. We are Forest Stewardship Council® (FSC®) certified, responsible land stewards and protect species according to the best available science, specifically the Stand and Site Guide. In recent years, more than half of the blocks we have put out for tender have timing restrictions associated with Species at Risk. Our harvest blocks are already very small scale compared to Crown land and sometimes hard to garner interest in. Limiting the timing of harvest exasperates this problem. Other private landowners face these same obstacles under the *Endangered Species Act* (ESA). This does limit the ability to “put more wood to work”.

Solutions:

- Operations on Crown land require a permanent solution to the duplication between the *Crown Forest Sustainability Act* (CFSa) and the ESA. We are pleased to see that MNRF is actively addressing this item, and have recently submitted our support of ERO# 019-1020, Proposed Changes to the *Crown Forest Sustainability Act*. We hope to see this solution put in place in a timely matter to provide confidence to the local forest sector.
- Increased MNRF-lead research to refine direction for Species at Risk protection, such as that included in the Stand and Site Guide, reducing the reliance on a zero-risk approach.
- Acknowledgement of ecosystem management approaches would be welcome on Crown and private land, in that managing for diverse, healthy forests provide more habitat than a one-species management approach that often comes with working in Species at Risk habitat.

¹⁷ Improving the Endangered Species Act: Impacts on Renfrew County. February 2014, County of Renfrew.

- Clear, simple guidance to landowners on how to continue to sustainably manage private woodlots in Species at Risk habitat within the bounds of the ESA would be beneficial.

Lack of Markets for Low-End Material

We are very excited to hear of the potential future in mass timber and tall buildings, but this does not address the limitation that is currently affecting our local sawmills with limited markets and distance to destinations for pulp and low-end material. We are proud of the sustainable management of our forests – and this means that we must take the bad with, or sometimes instead of, the good quality wood while harvesting to ensure we’re improving the condition of the forest over time. Without destinations for this low-end material, the higher value wood cannot be harvested.

When looking to Scandinavia, district heating using biomass is a major use for low-end and pulpwood material. The biocomposites, bio-chemical and lignin-based material markets are all flourishing in these countries, but have yet to ignite in Ontario. Renfrew County was fortunate to have bio-oil innovators at Ensyn Technologies Inc. invest locally, but the company has recently sold their Renfrew plant to Kerry Foods, who will use the technology to make food flavouring from liquid smoke. This is another great use for wood, and an excellent investment in our area. Bioenergy should not be overlooked at a time when we need climate solutions. We encourage the Province to look into why a wood-based green energy business has left Ontario. It is also concerning to see that Biomass North has recently ceased operations.

In the past, the County of Renfrew commissioned a report³ examining emerging opportunities for bioenergy, bio-chemical and bio-materials from forests and farms. One of the most attainable solutions to make use of low-end materials from the forests was to utilize that biofibre in on-farm drying systems. This would reduce consumption of greenhouse gases and enable Ontario farm operations to increase the value of their crops on-farm, and provide a new and stable market for low-end materials from the forests.

Solution:

- We need a local solution for the pulpwood problem. Innovation must be supported and encouraged, incentivizing new and already existing wood producers to add on to their facilities to make use of pulpwood and low-end material.

³ Crop and Wood Fiber Processing and Management. January 2009. Prepared by ValleyBio for County of Renfrew.

Reduce the Amount of Area Lost to Pests, Disease, Natural Disturbance and Invasive Species

Invasive species are a growing problem that may eventually have the biggest impact on Ontario's future forests. We are encouraged to read the Discussion Paper on developing strategic direction for managing forest pests in Ontario (2019), and to see that the Province accepts responsibility for managing pests and the associated costs of doing so on Crown land. Given the cost that municipalities have been facing in dealing with invasive species, it seems possible that once spread increases into larger Crown forest land bases, the Forestry Futures Trust may face increasing pressure. We hope the future strategic direction considers this and has a contingency plan for the financial burden of fighting invasive species.

The paper also recognizes the need to work together with other jurisdictions. We hope this means MNRF will resume a leadership role in providing monitoring expertise, knowledge and information to private landowners and municipalities. MNRF's forest health program must provide adequate on-the-ground staff resources to properly monitor, survey and know Ontario's forests and the forests of neighboring private lands.

Encourage Management of Private Land Forests

We are encouraged to see the inclusion of "enhancing private land harvesting" in the Draft Forest Strategy. We have a number of ideas on how this could happen, which are outlined below.

- **Provide financial incentives for regeneration of private forests**, including tree planting programs for afforestation *and* reforestation. The potential for increasing forest growth and intensive forest management is significant on private land, and closer to major markets. However, the long time span between harvests compared to human life expectancy leads many landowners to be reluctant in re-investing in tree planting programs post-harvest, reducing the successful regeneration of difficult-to-regenerate, but valuable, species such as pine and oak. The 50 Million Tree program in the past has been invaluable in creating new forest area for the future. A hybrid program which encourages new forest and the successful regeneration of existing forest to suitable species would be welcome.
- **Fund and support outreach programs that are already doing good work to expand their reach:** Forests Ontario, the Eastern Ontario Model Forest and the Ontario Woodlot Association all play an important role in educating the public and providing valuable knowledge and resources.
- **Make LIDAR inventory available on private land** to help landowners realize management potential of their land.

- **Bring back support from MNRF staff to private land and the public.** Increased MNRF support on stewardship and outreach, as well as information to the public on Species at Risk, forest health and forest management information would go a long way in the management of private land. Many public inquiries and requests for assistance previously handled by MNRF Districts are now directed to County staff, a strain on already limited human resources.

2. Improving our Cost Competitiveness

The business of forestry is expensive in Ontario. Hydro costs, fuel, time lost due to red tape, and lack of skilled workers all are contributing factors to this issue. We are encouraged that the Draft Forest Strategy is committing to address red tape and workforce issues. We look forward to reading about how the goals set in the Strategy will be met, especially reducing costs for the forest sector and encouraging use of under-utilized species and log qualities (p.21). We are also encouraged to see the continuance of forest access road investment discussed in the Strategy (p.22), since all forest users benefit from these roads. The consideration of a separate roads program to assist municipalities with higher maintenance costs on roads that receive heavy logging-truck traffic would also be appreciated in future.

The size of the Province and lack of economical transportation is also an issue, but in Central Ontario, this could be tempered somewhat by creating more local destinations for low-end material. If we can sustain dozens of sawmills in this area, surely innovation can be encouraged to start plants for bio-energy, paper-based alternatives to plastic, lignin extraction and more. Policy and procedure must be in place to facilitate this, and economic incentives may attract innovators.

Innovation, investment and research must also be dedicated to the regenerating forest, to ensure future generations will have the same opportunities to benefit from a healthy, diverse wood supply. It is unclear what is meant by “leveraging silviculture funding” in the Forestry Futures and Forest Renewal Trusts on page 23. It should be clarified that this will not impede the achievement of or financial resources dedicated to silvicultural success in Ontario’s forests.

3. Fostering Innovation, Markets & Talent

We are pleased to see the short-term goals in this section include investing in the next generation of forestry products, increasing the use of Ontario Wood, and increasing awareness of the forest sector and sustainable forest management. We look forward to seeing initiatives that will help realize these goals.

In terms of growing talent in the forest sector, several successful programs funded by the Province have existed in the past: the Junior Ranger program and the Forester Internship program were heavily attended by those currently working in the sector. It would be hugely beneficial to bring programs like these back, and also consider programs that would encourage enrollment in trades, mill work and operations, as well as funded internships to help newcomers gain experience. It is a great time to work in Ontario's forest sector, we just need to ensure that people know these jobs are an option, and help them find the path to join us.

One area that has been identified as particularly difficult to fill positions is in harvest operations. There are limited training facilities for these skills, which leads to small businesses investing significant time and risk in training operators. A training program for forest machine operators would be beneficial to the local sector. We were pleased to see this mentioned on page 27 of the Strategy, and suggest that Algonquin College in Pembroke might be a candidate for innovative learning methods.

4. Promoting Stewardship & Sustainability

Although many companies, groups, organizations and individuals have made great effort to improve the public's understanding of how sustainably managed Ontario's forests are, there is still work to be done and we are encouraged to see this identified in the Draft Forest Strategy. Some additional ideas for action include:

- Update classroom curriculum and textbook content to cast forestry in the positive light it deserves, instead of falsehoods about how forests are managed. Changing the culture and perception of forest management needs to start at childhood. This could also help inspire children to consider a career in the forest sector.
- Meaningful investments in positive media campaigns, like the good-news story the Ontario Wood program has generated. We hope to see this continue and grow so that it may have even half the impact of the Foodland Ontario campaign.
- Increase support of organizations like Forests Ontario, who offer an outside perspective to the public, facilitate getting kids outdoors, and forest professionals into classrooms. The It Takes a Forest Campaign has also reached an audience we would not normally have access to as a sector. Programs like Forestry Connects, which has succeeded in bringing busloads of high school students to Renfrew County for the past 4 years to visit active operations, visit mills and learn forestry skills is completely dependent on funding to continue. Much in-kind staff support from local partners makes these programs successful.

In conclusion, we would like to emphasize our strong support for the development of a Forest Sector Strategy for Ontario, and what is presented in the draft. It is encouraging to see the main concerns of the sector being addressed, especially in finding a solution for overlap between the CFSA and ESA and continuing to provide provincial roads funding. We see the Strategy as an opportunity to set the tone for the future of forestry in Ontario, on Crown and private land, and are pleased to read a positive portrayal in the document. It will be critical for the Province to ensure the proper resources and expertise are available to implement the Strategy, and put ideas into action. We hope to see more tangible action items in the final version of the Strategy, and would welcome the opportunity to provide municipal perspective to an advisory committee or some other meaningful way.

Thank you for the opportunity to review Ontario's Forest Sector Strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul V. Moreau". The signature is stylized with a large initial "P" and a long horizontal stroke at the end.

Paul V. Moreau
Chief Administrative Officer/Clerk

A handwritten signature in blue ink, appearing to read "Lacey Rose". The signature is cursive and fluid.

Lacey Rose, R.P.F
County Forester