

ERO 019-6823 Draft Scaling Manual 2024

Thank you for the opportunity to comment on the draft scaling manual 2024 as described in ERO 019-6823. Firstly, Dryden Fibre Canada wishes to acknowledge and commend the Ministry of Natural Resources and Forestry for its efforts to streamline and modernize scaling practices in Ontario. These efforts are appreciated and welcomed.

In 2021 northwestern Ontario was under extreme fire hazards and recorded above average forest areas damaged by wildfire. The Dryden Pulp Mill which produces 327,000 air dried metric tonnes of northern bleached softwood kraft and consumes 1.9 million cubic metres of softwood fibre annually was greatly affected by these wildfires. During a recent feasibility review of a 2021 fire salvage harvest opportunity on the English River Forest, staff discovered language in the current and proposed scaling manuals which is inconsistent with the principles of wood measurement and the 1999 Ontario Forest Accord. This language limits the cost/benefit profile of harvesting and delivering forest products from killed and damaged forests, specifically wildfires.

Salvage Timber: Scaling Manual

4. Salvage Timber

Salvage timber is defined as:

Killed or damaged forest resources that have been affected by the natural causes of wind, fire, flood, insects or disease.

All Crown forest resources harvested on salvage operations are subject to Crown timber charges.

82

Any applicable method of measurement in this Manual may be used to scale Crown forest resources originating from licenced salvage operations.

There are no deductions for undersize, defect or cull logs when measuring salvage timber.

Wasteful practice standards will not be applied on salvage operations unless approved by the Ministry's Supervisor, Wood Measurement Section.

Scaling Manual Principles

Section II of the current and draft scaling manuals state, “the scaling of Crown forest resources is the measurement of harvested Crown forest resources and the determination of the defects that affect their use” and additionally “to account for the defects determined by scaling, the volume or grade may be reduced”.

During salvage operations the Dryden Pulp Mill receives chips from Crown land produced from whole log chippers where the rot defect is chipped, delivered to the pulp mill and mass scaled. Crown dues are paid on the gross volume even though no saleable pulp is produced from the defect. When forest resources are undamaged, the defect volume would be reduced for defect consistent with scaling manual principles.

Suggested Action:

Properly document and apply deductions for defect and cull logs on harvest volumes associated with salvage operations in the scaling manual revision.

Ontario Forest Accord (1999)

Of the 31 commitments agreed to by members of the Forest Industry, the Partnership for Public Lands and the Ministry of Natural Resources, Commitment #12 specifies the “MNR’s wood measurement system will not apply to volumes less than the minimum top diameter as prescribed in the regulated scaling manual of Ontario”. The scaling manual currently and continues in its draft to measure and apply Crown charges to volumes less than the minimum top diameter delivered from salvage harvesting. This practice is inconsistent with commitment #12 as intended.

Commitment #11 intends to implement measures directed at improving the utilization of Crown timber. The report of the Item #11 Committee to the Ontario Forest Accord Advisory Board specifically recommended the reduction in fixed minimum and residual value stumpage charges associated with Opportunity 4 – salvage of timber damaged or killed by fire, insect, disease or blowdown. Commitments #11 and #12 are exclusive and accretive to each as documented.

Suggested Action:

Properly document and apply deductions for undersize on harvest volumes associated with salvage operations in the scaling manual revision.

Sustainable Growth: Ontario's Forest Sector Strategy

Recent and current wildfires have resulted in high levels of destroyed forest. Dryden Fibre Canada ULC recognizes the importance of utilizing this available fibre. Consistent with the Forest Sector Strategy, the Company desires to promote stewardship and sustainability, put more wood to work and improve Ontario's cost competitiveness.

The two suggested actions will help achieve these objectives. Salvage harvesting carries additional operational costs and high commercial risks for wood processing facilities. Measuring salvage fibre similarly as undamaged fibre is an important step to reduce this risk. As mentioned, there are opportunities for the salvaging of damaged forests and action needs to be taken to further promote its practice.

Thank you for your consideration. I am available to discuss further.

Kind regards,



Chris Grant, RPF
Forest Resources Manager
Dryden Fibre Canada ULC