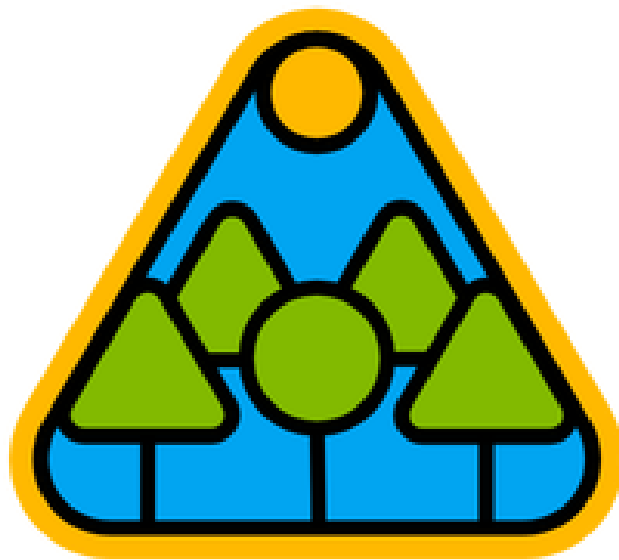


Response to the High Production  
Forestry Discussion Paper



**Healthy Forest  
Coalition**

March 31, 2020

## **Introduction**

The following are some of the thoughts, questions, concerns, and proposed next steps that the Healthy Forest Coalition would like to submit in order to help inform the process of the establishment of the ‘High Production Forestry’ zones of the triad.

When the triad approach was recommended, as per the ‘Independent Review of Forestry Practices in Nova Scotia’ (the Lahey Review), High Production Forestry (HPF) was to be the designated area that enabled industrial forestry values to be balanced against the larger Ecological Matrix lands. This balance would achieve a reasonable compromise that would enable a more unified vision for forestry activities on publicly-owned lands in Nova Scotia. However, in order for this balance to be achieved, it is essential that legitimate ecological forestry be practiced on the Ecological Matrix Lands that facilitate restoration of high-value, long-lived, climax tree species innate to the Acadian forest. In the long term, achieving this outcome benefits both industrial and ecological interests. Unfortunately, the second draft of the ‘Silvicultural Guides for the Ecological Matrix Lands fell far short of stated goals for ecological forestry. Thus, the required balance for the HPF lands to proceed is currently lacking. Supporting HPF cannot proceed until ecological forestry is put into practice.

We thank you for taking the time to consider these concerns and look forward to seeing changes brought to this system.

## **Questions and Concerns**

The Old Forest Policy project appears to be the only project which explicitly or implicitly involves Biodiversity Planning, especially on a landscape level. Depending on how it is implemented, it could affect the wood supply calculations, with far-reaching impacts. It is still, according to the [L&F Landscape Ecology page](#), in a research phase, with revisions to Old Forest Policy to be finalized by the end of 2020. That’s well after the envisaged completion of the HPF piece of the Triad (“Timeline: Finalize definition and determine criteria in early 2020”) and the Forest Management Guide, which applies to the Ecological Matrix Lands (“Timeline: Final guide in Spring 2020”). One question, therefore, is how is that supposed to work?

The Healthy Forest Coalition (HFC) submits the following key points to be addressed before proceeding any further with plans for HPF. Under the current economic dynamic and environmental, and climate-based issues that are of mounting concern, many other

matters are far more pressing than HPF. The HFC requires more details on HPF and more justification of its operability and its necessity given very recent economic changes and mill closures.

1. **Both *Old Forest Policy* and *Ecological Matrix Forestry* must be clearly delivered prior to choosing HPF lands**

- Confidence has sharply waned for the Forest Management Guides. The Silvicultural Guides for the Ecological Matrix lands (SGEM) requires extensive reworking to adequately demonstrate ecological forestry practices. They promote heavy industrial harvesting very similar to what has continued unabated since the Lahey Recommendations were accepted.
- Essentially industrial forestry practices are shaping up to fully prosper with few concessions on both legs of the TRIAD while ecological values continue to be underrepresented.
- Can the Department of Lands and Forestry (DLF) adjust timelines to ensure the Old Forest Policy and SGEM are adequately addressed before moving ahead with plans for HPF?

2. **The HFC requires finalization of Protected Areas, as part of the TRIAD, prior to focusing on HPF lands. Is there a reason why Protected Areas have not yet been finalized?**

- The public grows wary after the Owl's Head fiasco. The follow-through of full designation for all pending Protected Areas must be enacted. The planning of designation of these Protected Areas was governed by a thorough consultation process and the public deserves that this promise be kept.

3. **More landscape level planning is required and needs to be shared with the public.**

- It seems that ecological forestry lands will occupy proportionately more of the less productive forest types than the HPF piece. Not ensuring that the Matrix Lands possess adequate percentages of productive forests will disable the Matrix lands ability to support the intended ecological values that will be required in their absence upon the HPF lands.

4. **Legislation requires updating and should be made a priority as the Crown Lands Act oversees Crown forest operations and was a priority in Lahey Recommendations. Without legislative amendments, a new vision that governs forest policy and new programs such as HPF remain unsupported by the Coalition.**
5. **Western Crown Lands Planning Process seems to be on hold. Is there a plan to address the Western Crown lands prior to examining HPF?**
6. **The HFC draws attention to the fact that HPF does not align with climate change needs and requirements to increase carbon stores. Plantations do not sequester carbon and store the same amounts of carbon as natural forests do.**
  - The science behind plantation forestry seems to be out-of-step and out-dated in light of the new global stressors - namely climate change but also threat to insects, increased severity of weather events, and disease. In light of these facts, HPF should be restricted to the most minimal hectares possible.
7. **The HFC would like to view a more clear demonstration of how HPF would play out economically before being convinced that HPF is a 'wise investment'. Can you supply us with more information regarding economic details? Who will fund HPF? Will taxpayers fund HPF? Are there subsidies?**
  - We do not believe there is adequate research and models on which these statements can be based. It is not a wise decision to move forward on these models if they are unproven in our forest type and poor soils. This translates to a giant risk being taken on an uncertain future.
8. **The proposal for HPF having very short rotations is not supported in the Lahey Addendum, pg 65-66 "Production forestry not living up to its promise".**
  - Can DLF explain why expert opinion is being ignored in this case? Allowing plantations to have longer rotations was found to greatly enhance yields while reducing production costs. In the short-term, this would also allow for great

carbon sequestration, and other valuable ecosystem services, and slightly prolong the minimal ecological supports that would be housed with the HPF lands. Can DLF explain how the mathematics supports the shorter rotations proposed in contrast to the longer rotations suggested to be more economical?

9. **The HFC would be adamantly opposed to biomass from HPF operations being allocated directly, or to subsidize biofuel facilities or biomass for electricity. With a glut of chips already in our current market, there must be no direct harvest for the purposes of biomass burning.**
  
10. **The proposed land base for HPF is unjustifiably large**
  - Many hectares of private land, where better soils exist, have been laid bare in recent years, where the most extreme industrial forestry practices have occurred. It would seem that these localities would be the ideal places for HPF.
  
  - Ecological impacts have worsened in the 1.5 years since the Lahey recommendations. HPF must be considered in light of the continued transformation of Crown lands from continued clearcutting in the form of over-story removals, variable retention cuts, and salvage cuts. Very little intact forests remain and many hectares have been approved for clearcutting and other even-aged treatments which are also not based on ecological considerations.
  
11. **The HFC will need to examine the total ha of proposed HPF lands for each region of NS. Providing ‘percentages’ that are calculated from an inflated land base that included Protected Areas and other land bases, results in greatly diminishing the proportion of land stated for SGEM.**
  - The HFC needs to see a clearer representation of the amount of land proposed for HPF on its own, disentangled from percentages that are attached to other lands such as MFI, MCFC, Protected Areas, etc.
  
  - Besides a more accurate portrayal of total amounts of HPF lands being proposed, a spatial representation of HPF lands would be helpful. A map of where HPF lands are proposed.
  
12. **HPF is not currently *cost effective* under the current prices for wood.**

- Unless prices increase, HPF would have to be heavily subsidized
- Will HPF incur higher stumpage rates? This would seem fitting given the large amounts of financial startup and ongoing costs required.

13. **Beneficiaries of the production harvest should fully (100 %) fund any agro-forestry operation.**

- Who pays for site prep, seedling purchases, planting labour, tending, and herbicide treatments?
- Agriculture for food production benefits the common good, but Agriculture for forestry benefits far fewer people, mainly mill owners. There is no public support to fund these operations, and this should be the same. What is proposed to occur within the HPF is closer to an agricultural system than the silvicultural management of our complex, and diverse, Acadian forest type.
- The paper claims that 'old fields tend to have high site productivity'. This seems to be questionable. Farms are abandoned for various reasons, often economic. But old fields are sometimes abandoned because they have been worked out and are no longer productive, at least for conventional agricultural crops. Unfortunately the paper does not document the productivity assertion.
- Who exactly are the industrial beneficiaries of HPF? Given the environmental degradation witnessed in NB from plantation forestry, Nova Scotians would have great concerns if Irving becomes the major plantation operator/beneficiary on NS soils. Is there a high risk of potentially expanding the dominance of the broken New Brunswick Irving model of forestry to NS? Nova Scotians will want to know, and are wary of yet another bad forestry deal in this province to follow Northern Pulp.

14. **With current mill closures, HPF seems foolhardy. *Is now the right time for DLF to transition to promoting larger diameter saw logs?***

- With less demand on the landbase currently, allowing trees to grow into larger saw logs will generate less mill residue, which seemed to be so problematic. Meanwhile, trees will grow for free, without planting or tending costs. We respectfully suggest that HPF not be pursued on Crown land at this time, considering the highly unstable period of forestry investment and mill closures.

15. **A more natural diversity of age structure must be incorporated into planning for the HPF.**

- In 2016, DNR/DLF estimated that the forested land base comprised 4,238,433 ha., including protected areas. We can assume that this area has remained relatively constant over the past 50 years. We can also go back to a period when we did have some fairly good data on the composition of the forests. For example, in 1958 34% of our forest was between 61-80 years of age; 16% was between 81 and 100 years of age and 9% was over 100 years of age. In 1995, after about a decade of intensive harvesting, increasingly as clearcutting, 11 % of our forest was between 61-80 years of age; 0.9% was between 81 and 100 years of age and 0.15 % was over 100 years of age. This was a dramatic change: In that 40-year period the proportion of the forest aged less than 61 years had risen from 41% to 87.5%. Since 1995 the forest has put on some growth, but the pace of harvesting also rose considerably as more and more contractors resorted to clearcutting using highly efficient equipment. If we translate those percentages into estimates of area we get the following:

#### 1958

- 1,441,067.2 ha. (34%) of forest between 61-80 years of age
- 678,149.3 ha. (16%) of forest between 81-100 years of age
  - 381,359 ha. (9%) of forest over 100 years of age

#### 1995

- 466,227.6 ha. (11%) of forest between 61-80 years of age
- 38,145.9 ha. (0.9%) of forest between 81-100 years of age.
  - 6357.6 ha. (0.15%) of forest over 100 years of age.

- If we decided that by 2050 our forests should have an age distribution comparable to that of the NS forest of 1958, how would that break down into triad segments? Assuming that a large proportion of Protected Areas was well forested in 1958 and had grown normally between now and then, we might be able to replicate the 9% (42,518.7 ha.) of forest over 100 years old attained in 1958. It would, though, be much harder to replicate the 16% (678,149 ha.) of forest between the ages of 81-100 years of age, because extensive clearcutting has eliminated a great deal of the stands that would currently be between 40 and 70 years of age. This is particularly the case if we accept the following estimated distributions provided by GPI Atlantic in their 2008 report:

Estimated at 472,430 ha. It is not clear from the slide whether this included candidate protected areas.

**Age classes:**

1958

- 1 to 20 yrs = 0.5%
- 21-40 yrs = 6.3%
- 41-60 yrs = 34.5%
- 61-80 yrs = 34.3%
- 81-100 yrs = 16.4%
- 100+ yrs = 8.7%

1995

- 1 to 20 yrs = 16%
- 21-40 yrs = 15%
- 41-60 yrs = 37%
- 61-80 yrs = 11%
- 81-100 yrs = 0.9%
- 100+ yrs = 0.15%

1999

- 1 to 20 yrs = 16.3%
- 21-40 yrs = 15.3%
- 41-60 yrs = 36.3%
- 61-80 yrs = 11.5%
- 81-100 yrs = 1%
- 100+ yrs = 0.2%

1997-2003

- 1 to 20 yrs = 23.9%
- 21-40 yrs = 12.8%
- 41-60 yrs = 32.3%
- 61-80 yrs = 11.9%
- 81-100 yrs = 1.2%
- 100+ yrs = 0.3%



- NS Forests Age classes for selected years showing variation in calculations between GPI Atlantic *GPI Forest Headline Indicators for Nova Scotia, 2008*. Figure 1, Provincial Forest Area by Age Class, Percentage of Total Forest Area, 1958-2003. Columns for 1958, 1995, 1999 and 1997-2003 drawn from GPI.

16. **Species-at-Risk and lichens need to play more of a role in the planning and assessment phases of the HPF.**

- Nowhere is there any mention of consideration for proximity to a wide range of Species At Risk Habitats. No surveys are required for old fields in particular, which are likely slightly higher ground runoff and may contain, or border on, some of those habitats. Currently, forest harvesting on Crown requires surveys for lichens if there is mapped habitat for Boreal Felt lichen and one or two associated species, or mapped old growth. Clearing, fertilising and spraying for HPF could easily affect a range of species that currently exist in the surrounding areas. No surveys to address these, in some cases legal, considerations are mentioned. The DLF web page states that the Department does not have all the information required on SAR, so it is precautionary to assume that there are additional species that should be on survey lists that currently are not.
- What about appropriate hydrology surveys? Most of these old farm fields were never commercial farms, they were mostly subsistence farming, done where it could be done and with limited help from machinery.

17. **The violations of the international Migratory Bird Convention must be ceased.** As representatives from WetFor stated in an interview of CBC Information Morning in 2019, it is inevitable that the industrial harvest systems that have been employed in Nova Scotia violate this international law. In order to cease breaking this law, the HFC recommends an 8-10 week halting of harvest during the peak of nesting season (late April to late June).