

Department of Natural Resources and Renewables
1701 Hollis St.
Halifax, NS
B3J 3M8

Dec. 7, 2021

Re: Nova Scotia Old Growth Forest Policy consultation submission

To Whom It May Concern:

I am a resident of Nova Scotia, aged 30 years old, an amateur naturalist, and a major recreational user of Nova Scotian forests. I hope you will seriously consider the following recommendations for adoption into Nova Scotia's Old Growth Forest Policy (OGFP):

1. Integrate a clear and determined commitment to the restoration of ecological health in Nova Scotia's severely degraded forests.
2. Restore the protection of biodiversity as a key objective for the OGFP.
3. Classify all forests over 100 years in age as old growth. Forest resource inventories suggest that only 1 to 5% of Forests in NS meet this threshold.
4. Establish targets for 20-25% old growth forest coverage across Nova Scotia.
5. Immediately place forests over 100 years in age on Crown land under consideration for protection, stopping any harvesting, road building and development activity right away.
6. Forests of high conservation value, whether or not they meet the age threshold of 100 years, should also be considered for protection.
7. Develop connected old growth corridors for wildlife species reliant on the existence of this habitat type across vast ranges.
8. Establish a buffer zone around existing old growth stands to ensure minimal disturbance from industrial activity at the boundary.
9. Develop stewardship initiatives and funding sources that empower Indigenous communities and local residents to help protect, maintain, and manage old growth stands; involve local communities and stewardship groups in forest surveys intended to classify old growth.

10. Engage local communities and organizations in opportunities to strengthen province-wide awareness and education about Nova Scotia's old growth forests.
11. Encourage and incent private woodlot owners to identify and maintain old growth forest on their land through the establishment of carbon credit programming, survey assistance, biodiversity and forest management resources, etc.

Finally, I was disturbed to find out that the Department of Natural Resources and Renewables is attempting to count recently logged forests, or forests as young as forty years old, in existing protected areas towards Nova Scotia's old growth forest quota. Some speculate that this is yet another effort to 'fudge the numbers', so that the logging industry can continue to cut unprotected old growth stands on Crown land. If true, this is very saddening. This is exactly the kind of bad faith accounting that we should be working to expunge from our environmental protection policies. The OGFP is about protecting and making space for old growth forest. The Policy's purpose is *not* to ensure continued industry access to these rare old growth stands left unprotected. This should not have to be said, but I'll say it anyway: **only old growth forests should count as old growth.**

Thank you very much for your time and consideration.

Sincerely,

Simon Ryder-Burbidge

Mi'kmaw Territory

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