

February 19th, 2009

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Forest Division, Forest Management Branch
Forest Management Planning Section
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EBR Registry Number: 010-5349

Dear Mr. Pike:

Re. Proposed Revisions to the Forest Management Planning Manual

Notice of proposed revisions to the Forest Management Planning Manual (FMPM) have been posted on the Environmental Bill of Rights registry for public comment.

While the Ministry of Natural Resources has described the objective of the proposed revisions as being to make the forest management planning process "more efficient", a review by a number of environmental organizations - including Northwatch, Wildlands League, Earthroots and Ontario Nature – determined that the 146 proposed sets of revisions signal significant changes.

As part of our review effort, we have produced statements summarizing our concerns in the three key areas of forest sustainability, climate change and expanded biofibre production; these statements have been endorsed by the authoring organizations and others, as per the list below. These statements are attached. In addition, some organizations will be providing additional comments on these and other areas of interest and concern.

Thank you for providing a brief extension to allow these comments to be circulated to some of our colleague organizations. We would also like to express our appreciation for the excellent presentation provided by Forest Management Branch in January outlining the areas of proposed revisions.

Please do not hesitate to contact us for further clarification or details with respect to our submissions.



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Northwatch



Trevor Hesselink
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Determining Sustainability in Crown Forests: The Revised Planning Manual (2009)

Determination of Sustainability

The Crown Forest Sustainability Act defines sustainability as long-term Crown forest health.

The following quote from the Draft 2009 Planning Manual provides future forest managers with specific direction as to how to determine if a plan is sustainable.

“Section 5.0 DETERMINATION OF SUSTAINABILITY

The plan text will contain a conclusion on forest sustainability and include documentation as to how the forest management plan has regard for plant life, animal life, water, soil, air, and social and economic values, including recreational values and heritage values (Part A, Section 6 1.3.11). The conclusion will be based on the assessment of objective achievement (Part A, Section 1.2.7.1), the spatial assessment (Part A, Section 1.2.7.2) the social and economic assessment (Part A, Section 1.2.7.3) and prescriptions or the protection of values.

The documentation of the determination of sustainability will:

- (a) describe how the forest management plan provides for the sustainability of the Crown forest on the management unit, and discuss:
 - (i) the collective achievement of management objectives, and provide rationale for any management objectives for which desirable levels are not achieved;
 - (ii) the preliminary spatial assessment; and
 - (iii) the social and economic assessment; and
- (b) provide a conclusion that the forest management plan has provided for the sustainability of the Crown forest.”

A Better Way to Determine Sustainability

The problem with the above approach is that it is circular. Planners could set the timber harvest targets at a high level, and set low targets for biodiversity and wildlife habitat, and the plan would be sustainable. There is no objective analysis of the targets themselves to ascertain if the forest will be sustained when the targets are met. The conclusion [as in part (b) above] that the plan is sustainable is established when the targets are picked, because the assumption from the beginning is that the targets are sustainable. This is circular reasoning and needs to be changed. Figure 1 in the planning manual (page iii) illustrates how the process works and demonstrates the circularity of the reasoning. The text box on the right side of Figure 1 contains the

following quote- “**Determination of Sustainability: based on predicted levels of objective achievement.**” This captures the essential nature of the problem, no matter what targets are established, if they are achieved, the plan will be declared sustainable.

An independent assessment of sustainability is needed to assure everyone that the plan is sustainable. In order to avoid the problem of circular reasoning, it is necessary to have an independent assessment of sustainability.

At the end of the planning period, if the plan is truly sustainable, it should have a similar level of biodiversity, approximately the same volume of timber that could be harvested, and a similar amount of wildlife habitat as at the start of the plan. Without this independent assessment, the declaration of sustainability in the current draft of the 2009 Planning Manual is not valid.

Elimination of the Natural Benchmark Run

Unfortunately, in the 2009 manual, the requirement to establish a “Natural Benchmark” as a standard to compare to the planned management approach has been eliminated. This is a major mistake because there will not be a method to compare the management plan to the evolution of the forest in the absence of management. This removes a major tool for determining sustainability and whether the mandate of the CRSA has been met.

In the new manual, Table FMP-6 simply requires planners to list objectives for wildlife habitat. However, no comparison is available to illustrate how much habitat would be available if the forest evolved in the absence of human management. It will be possible to set wildlife habitat targets without reference to how much habitat would be available in a forest unmanaged by humans. Any target will be acceptable, and achieving that target will constitute sustainability. The result is reported in an Annual Report and then, if the objective has been met, the plan is declared “sustainability”.

The technique of estimating the Simulated Range of Natural Variation using approved models is a useful technique that applies to trees, stands of trees, and larger landscapes. However, linking the SRNV to wildlife habitat is both difficult and untested. Without some link to reality, a planner can impose almost any set of wildlife habitat targets, without the discipline of keeping the plan within sustainability limits.

The SRNV should be modified and used to estimate the amount of wildlife habitat that would be available in a forest influenced only by wind, fire and insects. Estimates of wildlife habitat available in the unmanaged forest could be tracked and compared to the habitat available in the management plan. This would be a useful approach to sustainability, and would have credibility.

This statement has been endorsed by the following organizations:



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FMPM Revisions and Biofibre

The 2008 EBR posted version of the FMPM facilitates the harvesting of biofibre in several places.

Under Road Use Management Strategies it permits strategies to be reviewed and updated to accommodate biofibre harvesting. There is also space to record biofibre harvest under Harvest Volume (FMP-13 and FMP-14), and Wood Utilization (FMP-15).

The liabilities associated with harvesting biofibre in Ontario have been well documented recently by Hesselink (In prep). These risks include:

- Forest productivity. Increased chance of lowering fertility of forest land especially in subsequent rotations. Current full tree harvesting already is presenting some risk on poorer ecosites. Increasing fibre removal intensity could expand the current risk to better sites.
- Insufficient monitoring for the enterprise. Performance to date has shown OMNR to lack resources for adequate monitoring and enforcement. The provincial government appears committed to reducing oversight further (Toronto Star, Feb 3, 2009) Intensifying harvest without increasing vigilance is irresponsible.
- Biodiversity decline. Woody debris is a vital habitat component for many species. Reduction of this material in managed forests may put species under stress. Current and upcoming biodiversity guides are weak in prescribing a minimum amount of material to be left on site. Biofibre harvesting may compromise even these tepid precautions.
- Carbon balance and accounting. The proposed carbon benefits of burning tree fibre instead of fossil fuels must be carefully evaluated to consider the full costs of transportation, processing and the opportunity costs. Removing more fibre, disturbing and depleting soil will reduce carbon storing capacity. The supposed carbon neutrality does not consider the long replacement time for every unit of tree fibre burned. A tree may burn in a few hours, but takes decades to grow.
- Unfeasible economics. Long haul distances for a low density fuel source may make the enterprise unprofitable. Burning fibre may also represent an unacceptable cost measured in value added wood products or biochemical opportunities forsaken in the process. Subsidization of a low return /high cost industry may perversely exacerbate all associated risks.
- Unprepared policy environment. Current legislation and policy were developed without considering the cumulative impacts of intensifying forestry through biofibre harvesting. The only apparent adjustment has been the development of a draft "biofibre policy" that stresses economic benefits while lacking biodiversity consideration.

Facilitating the harvest of biofibre through the FMPM is an example of the last point. The FMPM is, in its own words, ‘the pivotal document that provides direction for all aspects of forest management...’ It is one of the most influential tools for implementation of Ontario’s forest management law and policy. It incorporates twenty-six conditions from *MNR’s Class Environmental Assessment Approval for Forest Management on Crown Lands in Ontario (2003)*. Several of these conditions involve the ecosite-specific instructions for harvesting and renewing the forest known as silvicultural ground rules (SGRs). These rules are supposed to be based on silvicultural guides and manuals. However there are no current guides or manuals that adequately deal with biofibre harvesting. Any silvicultural prescription that allows for biofibre removal is thus an exception to normal practice and should be of special interest to the public and listed with practices such as high complexity prescribed burns and aerial herbicide application in section 8.2.2 of the FMPM. Biofibre harvest is conspicuously absent from this list.

This version of the FMPM should not be facilitating biofibre harvest, given the prominence of the FMPM in forest policy implementation and the numerous liabilities that the province’s biofibre direction raises. It promotes biofibre harvest in a policy context that is not sufficiently developed to control the significant risks. As such including biofibre considerations in the FMPM presents an unacceptable threat to the sustainability of Ontario’s forests.

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Hesselink, T.P. (In prep). Increasing pressures to use forest biomass: a conservation context.

Talaga T and R. Ferguson, "Red-tape cuts raise fears".The Toronto Star, February 3, 2009. <http://www.thestar.com/article/581363>

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Climate Change – More than Just a Consideration

The Environmental Bill of Rights postingⁱ for the draft revised Forest Management Planning Manual makes promises about what the revisions will provide in terms of direction on climate change, but the draft manual does not deliver.

The posting declares that “consideration of climate change in FMPs will have positive environmental, social and economic consequences (and) amelioration and mitigation of anticipated climate change impacts through forest management planning activities will contribute to sustainable forest management”.

Despite that promising statement, the draft contains only one reference to climate change, found in the revised Section 1.2.3, titled “Management Considerations”. The 2009 (draft) manual substitutes item (h) of the 2004 manual (which cited recent or anticipated insect pest infestations or tree diseases as one of eight management considerations) with the shorter item (h) of the proposed 2009 manual, which is a simply stated consideration of “climate change”. No details, no direction.

Changing Climate

Anticipated impacts of climate change include increased risks to the province’s northern forests and species.ⁱⁱ Climate change is expected to have direct impacts - such as increased frequency and intensity of fires and more extreme weather and wind events - and indirect impacts, such as the effects of additional damage from insects and diseases. Forest industry operating costs may increase because of a shorter winter harvesting season.

A warming trend will be another key effect. Past temperature changes of one degree have caused substantial changes in the home ranges of species. Current estimates predict changes of 2° to 8°C, which will have significant effects.ⁱⁱⁱ Under changing climate conditions the Great Lakes St. Lawrence forest is expected to expand northwards as the Boreal forest retreats.

Intact ecosystem corridors will be vital to ensure species migration.^{iv} Linking habitat patches via corridors can increase the ability of plants and animals to move between patches, thus increasing the amount of habitat available and extending ranges. As species ranges move north in response to a changing climate, connecting corridors provide one of the best opportunities for forest species to adapt.

Forest Management and Forest Management Planning

Responses to climate change generally fall into the categories of adaptation and mitigation. Mitigation means taking action to reduce the release of greenhouse gases

and so lessen the related impacts of climate change. Adaptation means taking action to best adjust and cope with the expected effects of climate change.

Climate change has been identified as a key concern during the development of forest management plans in recent years. In some Desired Forest and Benefits meetings climate change and global warming have been among the most frequently identified concerns. Comments have often focussed on helping to “prepare” the forest for the effects of climate change, and considering the likely implications of climate change in forecasting the future forest condition. Forest management planning participants also identified reducing carbon releases as an important aspect of forest management.^v However, the experience of at least some planning teams has been that the Ministry of Natural Resources is not able to provide either policy or science guidance in the development of objectives or setting management directions, or other aspects of forest management planning.

In a May 2008 workshop on possible revisions to the Forest Management Planning Manual, public interest group participants identified numerous options for FMPM revisions to address climate change, including:

- retaining forest connectivity,
- identifying climatic refugia,
- using full cost accounting to incorporate industrial carbon in any carbon analysis.
- using revised Silvicultural Ground Rules to favour outlying species (for example, red and white pine the boreal region)
- selecting technologies and site treatments based on carbon impacts
- minimizing loss of productive forest land (for example, roads and landings)

Key messages were that management must be adaptive and based on science, and that there is a need for high level policy development with respect to forest management and climate change, either in advance of or in parallel with revisions to the forest management planning manual.

The Ministry of Natural Resources’ Program-Level Strategy and Action Plan^{vi} on Climate Changes states that “a comprehensive climate change program involves all sectors of society as partners and participants in decision-making processes (and) the Ministry of Natural Resources will work to ensure that its clients and partners are engaged”. This has clearly not been the case to date. Rather, MNR scientists^{vii} appear to be engaged in some climate change related research exercises – most notably related to climate modeling, carbon modeling, and genetic resource management – in isolation from both public policy development and the development of field level operational guidance.

Simply adding climate change as a “management consideration”, as is being proposed in the current set of revisions to the forest management planning manual, cannot be relied upon – or expected – to be effective. While not necessarily inappropriate, it is simply inadequate. What is required is clear direction to make climate change strategies, for both adaptation and mitigation, key drivers in the forest management plan. These climate change strategies must be linked to each key area of the forest management plan – including plan objectives, Areas of Concern planning, spatial distribution of harvest blocks, silvicultural systems employed – and must be developed and evaluated at both the management unit and landscape level.

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References:

ⁱ EBR Posting 010-5349

ⁱⁱ MOE News Release, 12 December 2007

ⁱⁱⁱ The Canada Country Study: Climate Impacts and Adaptation, Ontario Region Executive Summary

^{iv} Climate Change and Ontario's Vulnerable Communities, www.c-ciarn-ontario.ca

^v Desired Forest and Benefits, Chart of Outcomes from Nipissing Forest May 7, 2007 Workshop

^{vi} MNR's Climate Change Program, Version 1.1 – March 2006, "Climate Change and MNR: A Program-Level Strategy and Action Plan"

^{vii} <http://www.mnr.gov.on.ca/en/Business/OFRI/index.html>