



Response

From the

Ontario Professional Foresters Association

to the

Ministry of Northern Development, Mines and Forestry

regarding the

**Proposed Framework to Modernize Ontario's
Forest Tenure and Pricing System**

Submitted: 2009-06-28

**OPFA Response to “A Proposed Framework
To Modernize Ontario’s Forest Tenure and Pricing System”
V9 - June 28, 2010**

In October 2009 the Ontario Professional Foresters Association (OPFA) provided comment on the MNDMF Tenure Review Project. Our comments were made in reflection of our statutory obligation to regulate the practice of professional forestry in the interest of the public. Our Members are licensed to be responsible for ensuring and promoting the health and productivity of Ontario’s forests and are accountable for the quality of forest management in Ontario. We were pleased to see that so many of our comments drew close parallels with the latest product of this process ‘*A Proposed Framework to Modernize Ontario’s Forest Tenure and Pricing System*’. As before, our comments will be limited to matters potentially affecting the practice of forestry and the sustainable management of Ontario’s forests.

We recognize that some of our comments may appear self-serving. We wish to be clear that our main motivation in providing comment is to raise the standard of forest management in Ontario. In keeping with our Mission...

"To honour our duty to serve the public interest by requiring and supporting the competency of those who practice professional forestry"

As noted in our earlier submission we favour a variety of management models (e.g. Single Entity SFL, Co-op SFL, or LFMC). Our concern is that regardless of the system implemented it must provide for sustainable forest management for the greater good of Ontarians. In this pursuit we echo our October 2009 position...

“The OPFA is primarily interested in commenting on aspects of tenure reform that relate to the sustainable management of our forests and the practice of forestry. Ecology, society and economy are considered to be the three pillars of sustainability. Only when each of the pillars is functioning well can we claim ‘sustainability’. We believe that enhancing the profession of forestry is an important component to enhancing the sustainability of our forests.”

The comments provided here are the results of consultations with our membership. Many of our members are very knowledgeable and experienced with Ontario’s forest tenure system and hold opinions beyond the scope of this response, which are quite variable, e.g. the role of the forest companies in the LFMCs. We have encouraged our membership to provide individual comment to this process.

The proposed framework has merits as well as raising some concerns and we offer the following additional constructive points for consideration by MNDMF as this process goes forward.

LFMCs - Orderly Transition

In our original submission we expressed a preference for a variety of management structures as this is in keeping with conventional theories of adaptive management. We still hold that view. A variety of models would better fit the complexity of the Ontario forest estate. While the LFMC is an attractive and viable model and a good addition to the suite, we also see the risks of implementing this broadly and quickly and we welcome the concept of pilot areas rather than a wholesale shift to LFMCs. Our association feels that the LFMC concept should begin on a voluntary basis. More than two pilot areas could be considered if there are willing volunteers.

Our association feels strongly that an orderly transition is essential. Care must be taken to ensure that the intellectual investments made by existing SFL companies are maintained. The development of the transition plan should involve the SFL companies and appropriate retention or transference of staff should be facilitated.

Fifteen LFMCs are too few. Local knowledge and involvement would be diluted in the decision making process and the necessary competition diluted. Comment would be available when the proposed boundaries are available.

Forest Sustainability

Our association feels strongly that the objects of all boards of directors should clearly emphasize the continued sustainability of our forests. We believe that the objectives of the boards must reflect a balance of economic, ecological and societal criteria.

Forest Renewal

Ontario has an excellent forest management system and responsible forest renewal is occurring. The OPFA, however, urges that MNR and MNDMF will use this opportunity to strengthen the existing renewal funding mechanisms to ensure that our forest renewal programs are enhanced.

Valuing Local Knowledge

It is important to recognize the value of local knowledge in the forest management planning process. Some foresters have worked many years on 'their' forests; they know the landscape and stakeholders well and care about the outcome of forest management activities. As a profession we consider this type of knowledge to be an investment in the forest itself. It is critical that the restructuring of Ontario's tenure system recognizes the value of this local knowledge and try to retain it where possible.

It is important that forestry staff be directly involved in the operation of the LFMC and in addition, that membership in the OPFA should be a key qualification for the General Manager position.

Governance

We are encouraged to see that the various boards will be formed with an emphasis on good governance. We see the challenge of balancing provincial priorities with the local perspectives. It is important that the former not be served at the expense of the latter. Accordingly, we envision that these boards will include leaders from smaller forest dependent communities and we recognize the importance of the local use of a wood supply. That said, parochialism is to be avoided in order that Ontario's sustainable wood supply be used to its full potential.

Reinvestment in the Forest

Our association applauds the concept of re-investing net earnings in the forest. We would like to be involved in establishing criteria and guidelines for what would constitute re-investment. We feel strongly that this is an excellent way to increase the quality of our forests for enhanced wood products or habitat, and also through training to increase capacity of aboriginal and non-aboriginal forest communities. Ultimately this has the potential to enhance our forest culture. Why not use all revenue available to support forest-based activities that will diversify local economies, support biodiversity and build capacity? We feel that all net earnings should return to the forest. Dividends to the people of Ontario from their forests are in the form of healthy forests, employment and taxes flowing from the resulting robust forest sector. Finally, net earnings must not be used to replace existing road funding mechanisms.

Research

As stated in our previous submission our association welcomes the potential for increased forest research. It must be assumed the research is also an appropriate use for the re-investment in the forest before any dividends are declared. Some mechanism must be devised to focus and facilitate research funding. In this scenario the proponent's share would come from reinvestment of a portion of the LFMCs profits. Our association would also like to be involved in establishing criteria and guidelines of this process.

Our members also point out that the separation of major wood using companies from direct forest management and the suggested exclusion of the forest industry from forest management could result in the withdrawal of their current support of research initiatives e.g. Forest Ecosystem Science Co-operative. At least through the transition period, mechanism(s) to maintain or enhance research investment may be needed.

Effective Public Involvement

There is concern that a relatively small number of LFMCs as proposed could reduce the effectiveness of northern communities to be directly involved in the management of the forest estate. At present there are over 30 Local Citizens Committees that serve as an essential contact with the public. Although the proposed framework doesn't speak specifically to the relationship of existing LCCs we believe they should remain separate from the proposed LFMC Boards and that the current arrangement of 1 per management unit should be maintained.

Planning Implications

The proposed framework introduces two new terms "ecologically based planning areas" and "management areas". It is not clear how these terms relate to current and future forest management planning systems. These structures could lead to the separation of strategic and operational planning and perhaps even support land use planning systems. Strategic planning for some non-wood assets (e.g. forest composition caribou habitat, and forest access) can be dealt with through the land use planning system. The results of these deliberations would then provide direction to the existing forest management planning system. There are concerns among our membership that simply separating strategic and operational planning could lead to situations where broad strategic direction is out of touch with local realities.

If MNR intends to make further changes to the forest management planning system, it must be a separate process and not be rushed to maintain pace with the MNDMF initiative. Any planning changes must retain the collaboration that currently occurs between local agencies to ensure a balance of interests.

Impact to the Profession

It is clear that the many professional foresters who are employed with current holders of Sustainable Forest Licences (SFLs) face an uncertain future. Many feel concern that their services will no longer be required by the current SFL holder. Conversely, new opportunities exist as the proposed Local Forest Management Corporations will require the professional services of these foresters. Similar concern exists among contract foresters and even foresters employed by the Crown.

It is important that this process attempt to mitigate this uncertainty. It is essential that the transition of the SFLs from the forest industry and co-operatives, proceed in an orderly manner with an objective to maintain forestry skills and local knowledge.

Foresters and Sustainability

We suggest that the ratio of practicing professional foresters to land area serve as a benchmark to measure how these skills are managed. The ratio of professional foresters to hectares managed is already well below that in other major forestry provinces. Given the additional thrusts requiring attention e.g. climate change mitigation and response; biodiversity, species at risk, etc. the ratio should be increasing. Measuring this ratio now and at a date sometime after implementation will indicate clearly how well this process has enhanced the practice of forestry and thus the sustainability of our forests and ultimately to the benefit of the public.

Further on that theme, it is critical that this not be a downsizing exercise. Forestry expertise is already too thin on the ground.

We also wish to reiterate the point made in our earlier submission that changes to the renewal rates should require an RPF sign-off.

Board Membership

A significant number of our members bring experience with and/or on Boards of various sorts or related general management experience. As well, Boards would be well served by their experience in balancing the three interests of sustainability: environmental, economic and social. We recommend that at least one member of the OPFA, selected for his or her professional status sit on each of the boards.

Forest Industry personnel will also have useful knowledge and a representative of the forest industry should also be included.

We value the opportunity to contribute to these important developments and would appreciate discussing them further at your convenience.