

**Recommendations to the Crown Land Task
Force on “A path for a sustainable economic
forest in New Brunswick”**

Submitted by

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Dear MS. & Sirs:

Pursuant to the request for comments on the Crown Land Task Force document, "A path for a sustainable economic forest in New Brunswick", I submit the following commentary.

On page 1, the task force erroneously sets up a non-existent straw man of the "minority who feel that the forest industry locally is a "sunset industry"." This spin on reality creates an artificial and non-existent dichotomy in the debate that colours the validity of the report's conclusions. There is a real and palpable opinion in the province, and within the forestry community that "Pulp and Paper" is a sunset industry, but I am unaware of any substantive body of opinion that thinks forestry will not play a role in the province's economic future. This is a small point but should be clarified in the final report to the advantage of the task force.

A second basic assumption that requires substantiation comes in the footnote 4 on page 18. It states in part:

"There is some debate around how much wood will be available and when, and even those debates can be affected by unforeseen natural events. The task force accepts the general belief by experts in the field that more wood will become available."

This premise is basic to many of the conclusions in the report. This "belief by experts in the field that more wood will become available" requires documentation, both within this report and in the literature in general. No substantive studies have been reported to document this belief. Given the existence of thousands of permanent sample plots in the province, and given past temporary plot sampling, the technology exists to definitively answer this question at relatively small expense. The lack of substantive studies hints that the truth is one the province and industry would not like to hear. If the report seeks credibility, it would recommend that this research be completed immediately in order to definitively document the progress of the province's existing growing forest. Computer modeling based on wishful inputs can only result in wishful outputs and projections.

But even within the stated assumptions, the report's conclusions crumble under the weight of their contradictions. Key within these contradictions is the belief that ever increasing plantation establishment correlates with ever increasing economic benefit. This assumption fails on several fronts. First, New Brunswick's Acadian Forest provides the greatest long-term potential for a healthy and diverse forest economy and ecology. The hardwood and mixed wood stands within this diverse forest type provide the greatest long term potential and flexibility of the forest industry. Destruction of this forest type is wrongheaded on many counts. Foremost within this destruction is a head on collision with

the forest certification that the report puts forward as an objective and an economic necessity. Conversion of Acadian Forest stands to plantation beyond 15% of total forest has been shown to result in measureable conversion of forest community types within ecological units of the province's Ecological Land Classification System¹. Such conversion is counter to forest certification standards and will result in de-certification with concomitant economic loss. The task force does not perceive that plantation establishment is not independent of certification goals and that plantation establishment is economically counterproductive beyond a critical threshold.

The task force also fails to perceive that the greatest benefit economically and environmentally will be achieved by moving the province into industry that assures the greatest proficiency of converting timber into employment, i.e. maximum jobs per unit of wood harvested. The strategic emphasis has to be on secondary wood processing and a strategy that makes such products economically viable in New Brunswick first, with an eye to expanding the market outside the province in the future. Other jurisdictions create twice as much employment per unit of timber harvested compared to New Brunswick. Pulp and paper creates less than 1 job per 1000 cubic metres of timber harvested. Secondary wood processing can generate up to 2.25 jobs per 1000 cubic metres. The Biomass and bio-fuels industries will only exacerbate the province's dismal proficiency performance, creating 1/13th the jobs of pulp and paper per unit of timber. Biomass utilization is a disaster for sustainability, and a disaster ecologically and economically. It is a literal "dead" end, depleting the forest of the nutrients for sustainable forest growth while delivering very small return in employment.

The task force report does not perceive its error in not abandoning the profit oriented paradigm of the forest industry. Industry will not abandon this "profit first" paradigm without an incentive from government. Government has a role to play and that is to reward proficiency in converting timber into employment and to penalize failure to do so. Profit without concomitant job creation should be taxed heavily. The task force needs to acknowledge this reality and needs to recommend maintenance of forest types that will enhance proficiency.

So within the mandate of the task force my recommendations are:

- Abandon arbitrary goals of \$4 billion in annual shipments of forest products at any cost
- Set goals for proficiency in converting timber into employment as a guiding principle in forest management, specifically enhancing forest types conducive to proficiency.
- Reward Timber-into-Employment proficiency, penalize profit generated at the expense of proficiency goals.
- Recommend immediate scientific determination of growth prospects across the province.
- Maintain environmental constraints at scientifically determined levels.
- Set plantation goals at more realistic levels for certifiable forestry.
- Cease all conversion of certifiably Acadian Forest Community type ecological land units under the NBELCS.
- Implement the recommendations of the Legislative Committee on Wood Supply of 2004.

ⁱ Wuest, L, and Betts, M.G. 2010. Quantitative tracking of the vegetative integrity and distinctness of forested ecological communities: A case study of plantation impacts. *Canadian Journal of Forest Research* 40: 330-346.