

## Comments on Jaakko Poyry report on NB crown lands management and stewardship

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My name is Sean Blaney; I work as a Botanist – a scientist studying wild plants. I have worked extensively on forestry related projects on rare plants for most of the large forestry companies – so I have real experience in this area. I am not some urbanite who likes the idea of wild forest but has never seen it, or who has never seen a skidder. I have spent hundreds of days in forested landscapes looking for rare species of plants. I can say with some confidence that I am the person most knowledgeable about the distribution and status of forest plants, and plants in general, in the Maritimes. I have read every word of the Jaakko Poyry report, and I would like to provide a critical assessment of its claims and recommendations here. The Jaakko Poyry report presents a very one-sided view of New Brunswick forestry, overstating potential benefits and understating the costs of the recommended course of action.

The report suggests that we can get more economic value out of our forests at “minimal” cost, at least minimal cost ecologically. We can essentially have our cake and eat it too. We can meet all the environmental and social objectives of current management plans (such as protecting water supplies and conserving all species), and still double the amount of wood (and profits) the land is producing. Sounds tempting, right? If I were a woodlot owner I’d say this sounds like a pretty good idea. If I were a forest company manager, charged with maximizing my shareholders’ dividends, I’d say this sounds fantastic. Perhaps, as someone interested in conserving NB’s biodiversity, there is something in this report for me too. If we can make some of our forest land more productive, we could perhaps conserve more of it at no economic cost. But that is not what this report suggests. The report suggests a massive intensification of our use of crown lands on top of existing uses (which are already very intense), with no increase in protected land. In fact it actually recommends reducing current protections. Following these recommendations would have major costs.

Let’s look first at the key claim of the report, that NB can double its softwood supply. When will we be able to reach this goal following report recommendations? Check out the graph on p. 44 (the most important page in the whole report, I feel) – we’re not going to reach maximum yields for 65 years – in 2068! There will not be ANY significant increase in yield for 45 years; NO SIGNIFICANT DIFFERENCE IN WOOD SUPPLY until 2048. Note also that the actual difference in yield after this time is **not double, but in fact only 1.5 times**, because there will be a natural increase in yield with the generally aging forest structure. Even 45 years is a long time to wait for results, considering the vast costs and the risks associated with the recommendations. Following the recommendations in this report would be a HUGE gamble. A lot can change in 45 years, and we just don’t know the economic conditions that will be driving the forestry industry in 45 years. The report compares softwood yields in NB & Finland, saying we can move productivity from 1.8m<sup>3</sup>/ha/yr (current NB rate) to 3.0 m<sup>3</sup>/ha/yr (Finland rate). It does not compare these figures with areas in the southern hemisphere, where most of the expansion of the

worldwide pulp and paper industry is currently occurring. In Brazil, yields can be up to ~ 70m<sup>3</sup>/ha/yr – 23 times greater than in Finland, and labour costs are greatly reduced. If production costs are 50 or 100 times less expensive in the southern hemisphere, where do you think forest companies will be investing in the future? Looking down the road, is it going to be any benefit to NB to be at 3.0 in 65 years if we are competing against 70? It is important to remember that what has worked for the forest industry in Finland over the last 40 years will NOT necessarily work in NB in the coming 45-65 years. Global economic conditions for the industry are changing...

OK – so it will take a long time for the recommendations to have any effect on wood supply, and it is very unclear whether the increased wood supply will really provide NB with a competitive advantage over other jurisdictions once that effect is reached. What about the costs of implementing the report's recommendations? Costs, both economically and environmentally, are pretty staggering.

How exactly is the suggested increase in softwood yield accomplished? The major driving force is through an increase in the amount of conifer plantations, doubling their occurrence on crown lands from 20% of crown land (already a vast area) to 40% of crown land. Total crown land is 5.3 million hectares; 20% of that is 1060000 ha – that is amount of NEW plantations that will need to be created to meet targets set in this report. **That is equivalent of a square block of land 102 km long on each side!** To give a clearer idea, that would be equivalent to all of the land from Sackville, along the Fundy coast to St. Martins (almost all the way to Saint John), up to Chipman in C NB and over to Kouchibouguac National Park, with all of that land losing most of its biological diversity for the foreseeable future.

To create these plantations requires a lot of money. Whose money? Is this an investment made by forestry companies? No, it is made with public money. This is a gamble taken by the people of New Brunswick. The report says that spending on silviculture to produce these new plantations would have to increase from an average of about \$26m/yr to \$38.3m/yr. From now through to 65 years from now this will amount to \$800 million of public money – almost a billion dollars, in order to convert our diverse natural systems to plantations.

On all of that land, natural processes of succession are suppressed with pre-commercial thinning and herbicides, greatly reducing the natural diversity of species. This is especially true on the very large area of NB forests that are not naturally conifer dominated. It doesn't take a scientist to see that plantations are vastly simplified landscapes compared to natural forests, or even naturally regenerating clearcuts. Certain types of species benefit, but those are generally the ones that are already the most common on the landscape. Generally, the species that require deciduous forest, mixed forest and old forest are lost from the plantation areas. Deciduous forests and eastern white cedar forests, especially those on rich soils, are our most diverse forest types. Unfortunately, these are also the best areas for rapidly growing conifers in plantations. If plantations are concentrated where they will grow best, they will be disproportionately hard on natural biodiversity.

Report repeatedly cites the Finnish example, and half a page on p. 30 is devoted to "Lessons Learned – What would Finland do differently?" This is probably the most inadequate section of the entire report. All it says about consequences of intensive forest management on biological diversity:

“Changes in the forest have put pressure on some game animals, but favoured others”

“There are practically no natural forests in southern Finland and few areas of old forests with dead wood.”

Scandinavia is actually the place where effects of high intensity forestry on biodiversity are best documented worldwide. There is a huge literature on species made rare by forestry in Scandinavia, there are even whole academic journals devoted to the subject. Rare species lists in Scandinavia include a whole range of species whose rarity we have not even begun to take account of in New Brunswick, or that we would have a hard time even imagining as rare – from lichens to bracket fungi to flying squirrels to beetles dwelling in dead wood. Summarizing this literature as “changes in the forest have put pressure on some game animals, but favoured others” is a very deliberate inaccuracy on the part of Jaakko Poyry.

The report contains four additional recommendations that I have serious concerns about.

1) “The province must elevate timber supply for commercial use to a primary objective in the management of Crown Lands, with targets that are binding on the Government and on the licensee.” Currently we meet environmental obligations first and then take allowable cut out of the remainder – a more environmentally sensitive approach than most other jurisdictions, and something I think we should be proud of and maintain. Setting targets for wood production on crown land is not necessarily a bad thing, but setting binding targets at levels that can only be reached through maximum forestry intensification simply ties our hands and prevents us from dealing with any new understanding of the impacts of forestry in the future.

2) The most worrisome of these is the idea that there can be increased harvesting on lands currently under some level of protection. The report says: “Special management zones should be critically reviewed and, where possible, additional harvest should be permitted”, and suggests that harvesting could be increased by 250,000m<sup>3</sup> per year in these zones. One of the major types of special management zone is the watercourse buffer in which limited harvesting is permitted almost right to the watercourse. These zones are incredibly important, not just for protecting water quality, fish and other aquatic life, but for non-aquatic biodiversity as well. Species diversity is not evenly distributed on the landscape, it is highly concentrated along watercourses where nutrient levels and diversity of microhabitat types is higher. Because watercourse buffers always remain in the same place (different from some other special management zones that move around over time), they also offer a permanent refuge and dispersal corridors for some of the many species that need forest older than 100 years (but that can survive in small scale patches). Because the length of time between harvests is typically less than 100 years, species needing older forest will continue to become rarer on working lands in future. We should not be reducing watercourse buffers or mature spruce-fir and mature hardwood zones that play a crucial role in preventing the complete loss of mature forest species. The report justifies the Jaakko Poyry stance on special management zones by saying they take up an inordinately large portion of crown land – 32%. But this high percentage is necessary because so little of private land is protected in any form (special management plus protected zones makes up only about 14% of total landscape). It is also important to note that this 14% figure includes only 3% in full, permanent protected areas – one of the very worst records in all of Canada.

The report suggests that we can take more wood off special management zones as long as we monitor effects carefully, but it makes no mention of the cost of increased monitoring. Research in remote areas is very expensive, and if we want scientifically valid monitoring, we will need to

increase current research and monitoring budgets on the scale of several million dollars per year. This added cost needs to be factored in to the equation. It is also important to note that even this not-very-balanced report suggests that would be impossible to take more than 250,000m<sup>3</sup>/yr more off special management zones without compromising their purposes. This would represent a relatively insignificant 3% increase in total wood supply, a very small return given increased risks to the values protected under special management zones and the extra cost required for increased monitoring of effects.

3) The reports suggests that NB DNRE management of crown lands is overstaffed, and that most of the job of monitoring compliance with regulations in the field can be left to private auditing companies that doing forest certification. It is unrealistic to compare DNRE wardens who are on the ground 50-100 days per year and have an excellent understanding of the local landscape to auditors from another region who are present for only 1 week per year and who may spend considerable time in the factories during that week. Following this recommendation seems almost certain to result in more violations of existing regulations. The report praises the comprehensiveness of NB crown lands management, but suggests staffing levels are high. NB's more thorough approach requires sufficient staff, and NB is not overstaffed in comparison with other smaller jurisdictions, having 4x fewer staff than NS and 2x fewer than Finland! The report text is very misleading here.

Finally,

4) The report suggests "Conservation values of private lands should be taken into account when evaluating the need for set-asides and special management on public lands. This should include a process to establish a form of voluntary designation on private industry land (and woodlots)". This is a reasonable recommendation, we need to think about the entire landscape, BUT we can only control private land use to a limited degree. If private lands are to be counted against conservation goals, we need to ensure that the features are conserved as permanently as possible. We can't let a forest company declare an area protected and then decide it needs the wood and have the area cut. For protection to count, it should be as permanent and binding as possible.

## **Conclusions**

Report overstates the potential benefits, failing to mention that competition with the more productive forest and cheaper labour in the southern hemisphere may negate any value that the increased yields might produce. The length of time required to produce results is beyond that for which we can predict forestry economics. The report deliberately understates the huge environmental costs that will be associated with the conversion of one million hectares of public forest from relatively natural to artificial successional processes. I do not believe that we should be using NB citizens' money to seriously damage the natural values of one fifth of all public land, with very questionable returns, providing benefits primarily to huge private forestry corporations. I believe that most New Brunswickers would feel the same way if they knew exactly what was being proposed in this report.