About WPMANS

The Wood Product Manufacturers Association of Nova Scotia ("WPMANS") is an Association representing Nova Scotia’s independent, family owned sawmills. Although our members’ sawmill operations vary in size, they are generally a cornerstone in the communities where they are found. Despite curtailments and pressing times, our members’ operations sustain several thousand direct and indirect jobs in the Province. Moreover, we are vital to the pulp and paper sector which requires WPMANS members’ products (sawmill chips, pulpwood, hog fuel and biomass) as raw materials and sources of energy.

Forest Management Goals and Practices

- There is no universal set of management goals or practices that should be applied to all lands.
- Flexibility (a wide variety of available forest management techniques) is required to enable landowners to achieve the goals they consider appropriate for their specific sites. Available management techniques must include clearcutting, planting and herbicide use among many others.
- Whether mimicking a natural disturbance regime (through clearcutting or otherwise) is appropriate will be a site specific determination which must also take into account the landowner’s environmental and financial objectives.
- Clumps and riparian zones established under current regulations have been unfairly designed to discriminate specifically against forestry operations. These impose a significant financial, administrative and operational burden solely on the owners and managers of forest resource lands. Others (such as farmers, land developers and golf courses) are not required to play by the same rules which, in any event, have never been scientifically proven to have any environmental benefit. WPMANS continues to oppose the current regulations which unduly waste productive forest land, squander valuable timber (through blowdowns), increase costs and discriminate against our industry. Landowners should be compensated whenever their financial interests are sacrificed for some broader public goal. Moreover, all landowners should bear these and similar burdens equally.
- The vast majority of forest lands in the Province are privately held by approximately 30,000 different owners. Each of these owners may have distinctive objectives. This makes broad scale management (such as connectivity and landscape level planning) inappropriate for private lands as the owners’ traditional rights must be respected. It may be possible to persuade landowners to participate through financial incentives and education. However, landowner participation must be on a voluntary basis.
- Many WPMANS members either participate in or encourage the development of non-timber forest products on their lands. This choice is but another which depends on private landowners’ personal objectives.
A cautious approach should be taken in the development on non-timber products on Crown lands. Timber products proven viable year-round over many years must not suffer as more speculative ventures proceed.

The movement toward greater Forest Value Chain Optimization will require ongoing re-evaluation of forest management goals and practices. Rules that are difficult to change should be avoided. Flexibility will be required to enable all players to benefit from potential future efficiencies.

**Crown Land Management**

- Due to budgetary restrictions, the Crown often has a limited understanding of its forest inventory. As a result the Crown does not maximize its AAC or properly promote the vigorous renewal of healthy forest stands.
- Crown land management today generally involves protracted delay at the IRM stage, during the Management Plan approval process and in funding.
- Lack of certainty as to the boundless limits of future Protected Areas ties up considerable Crown lands sorely in need of forest management that will ultimately never be “protected”.
- WPMANS has always maintained that too much Crown land has been tied up in unmanaged Protected Areas. This has had a significant negative economic impact on rural communities and will in the near term threaten the environment. There is no unadulterated nature in the Province, and intensive active remediation may be required to improve habitat and address complex threats such as acidification of streams, climate change and introduced species. The general public’s romantic attraction to “protection” through abject unmanagement must be resisted.
- Education is required. We cannot continue to bury our heads in the sand.
- Other jurisdictions have been much more liberal than Nova Scotia in including lands (such as riparian zones, green belts and designated private lands) in the 12% target to be protected. Nova Scotia should follow these examples.
- Nova Scotia is small and its Crown land base is proportionately even smaller. The Province should follow the example of California, Australia, New Zealand and others by identifying and protecting lands for industrial forestry.

**Private Land Management**

- The Province must respect the traditional rights of forest landowners when it comes to land management.
- There are many groups and individuals with no financial stake or material property interest anxious to impose their values on private landowners. The livelihood of private woodlot owners must not be sacrificed to appease these interests.
- Private landowners must be financially compensated when restrictions which impact them financially are purportedly imposed for the greater public good. If the public thinks these restrictions are good, then the public should be prepared to fairly compensate the landowner for the attending financial losses.
• Government intrusion in private land management should be limited to information, training and financial incentives.
• The same rules should apply to all users of lands without discrimination. Those who manage forest lands for timber production must not be singled out for harsher treatment.

Support For Private Landowners And Industry

• WPMANS strongly supports intensive forest management through silviculture.
• Private landowners should be encouraged to manage their lands through incentives.
• Unlike our competitors outside the Province, the sawmill sector has been saddled with the burden of funding silviculture on private lands - and at a time when we can least afford it. Although temporary measures have reduced this burden, a permanent solution is required.
• If public sources of funds are not available, landowners should collectively fund silviculture on their lands through a small land management surcharge collected annually by the Province.
• Whether large or small, industrial or private, all landowners should have equal access and treatment in respect of silviculture funding.
• The vast numbers of properties and landowners in the Province make Forest Certification difficult. Government should expand its efforts in cooperation with private and industrial forest landowners to bring more lands under recognized Forest Certification systems.
• Government must create the conditions that allow industry to prosper. The burdens imposed or influenced by Government policy (through forest policy, taxation, energy policy, transportation, environmental and labour regulation and the like) must not exceed those of our competitors in other provinces.

Forest Protection

• All lands in the Province including unmanaged Protected Areas should be actively protected against all fires (naturally occurring or set), all insects and all pests (exotic or indigenous). The naïve and dangerous “let nature run its course” approach must be resisted everywhere, including Protected Areas.
• It is a poor time to set rigid forest protection policies. The impact that climate change will have on all plant and animal species (indigenous and exotic), and the relationships among them, is poorly understood. Flexibility and responsiveness will be required.
• Better coordination of forest protection with the Federal Crown is required. Federal officials’ failure to cooperate in the case of the Keji pale wing gray infestation provides an example.
• The application of approved herbicides and pesticides should be available to protect all lands in the Province including unmanaged Protected Areas.
• The current “do nothing” Protected Areas management philosophy must be rejected. Active management, including remediation, may be required to
maintain or restore forest ecosystems. For example, lime doser pilot projects should be commenced in several of the Tobeatic’s dying rivers with a view to restoring fish habitat.

**Stewardship and Education**

- Urbanization has left many Nova Scotians with little understanding about forest management and the significance of the forestry sector to rural families and communities.
- There should be a renewed emphasis on forestry curriculum in public schools from a broad, balanced perspective.
- Efforts should be made to offer all courses required for regulatory compliance in Nova Scotia. These courses should be streamlined to reduce the time required in attendance and should be offered at low cost.
- Opportunities for distance learning via internet should be used both for public education and for delivering courses required to meet regulatory standards.

**Legal Framework**

- The legal framework is often needlessly complex.
- We need rules that are at least as favourable as those faced by competitors outside the Province.
- WPMANS supports the ongoing efforts of Government and FPANS to analyze the burden of regulations impacting the forestry sector in Nova Scotia and competitive jurisdictions.
- Recent initiatives to streamline processes through blanket permitting have been effective. However, courses required to qualify for blanket permits should be streamlined and offered in Nova Scotia at low cost.