

February 16, 2015

The Honourable Brian Gallant, Premier of New Brunswick

Liberal Members of the Legislative Assembly

Dear Premier and Members:

**RE: 2014 Forestry Strategy**

As a New Brunswick citizen who has worked in environmental assessment, planning, land conservation and sustainable forestry over the past three decades, I write to offer my concerns with the former Conservative Government's forest 'strategy.'

Concessions made to the forest industry in 2014 are excessive. They reflect a (Conservative) government desperate to create a few jobs for political gain at the expense of the wellbeing of the forest and its dependents. **Our Province cannot have a sustainable industry at the same time it is degrading the very resource it depends on.** By 'degrading,' I mean simplifying the forest ecosystem, over-harvesting through clearcuts, creating homogeneity out of diversity, and then intensively spraying what remains, along with the embedded vernal pools, unmapped streams and living things found in them.

Plantations will –under the new 'strategy'--amount to about one-quarter of Crown forests. Despite what industry says, a plantation is not a forest. There are no deer in plantations. There is not the complexity of micro-life found in the soils, the bryophytes and lichens, nor the high canopy and understorey of an old forest. Plantations lack the biological diversity to withstand ecological shocks, such as abrupt climate change, disease or insect infestation. There is not a robust variety of wildlife, of species that require specialized habitats that occur in natural forests, for reproducing and maintaining their populations. This is a major concern of mine, and should be one for your Government.

While industry representatives state that their harvest methods respect the forest ecosystem, the overall impact humans are having on wildlife is truly alarming. The World Wildlife Fund (2014) reports that **the number of mammals, birds, reptiles, amphibians and fish across the Globe is, on average, less than half the size it was forty years ago.**(1) This is science, the best available anywhere, and it says that habitat destruction (including deforestation), hunting, exploitation and to a small extent, climate change, are wiping out non-human inhabitants of the Earth.

It is against this global backdrop that New Brunswick is deciding whether to destroy more wildlife habitat for a handful of short-term jobs; jobs whose main purpose is to raise corporate profits while ultimately reducing employment in the industry. Now is exactly the time when **government should be doing everything possible to ensure we are not contributing to the loss of any species of wildlife found in our native forests.** Sadly, honouring the forest contracts as written will ensure this is not the case.

The 2014 plan will allow half of the increase in AAC to come from old forest and previously designated 'conservation forest.' Biologists with the Department of Natural Resources have said that as a result, **Crown land will no longer sustain viable habitat for six suites of wildlife** (ie., as determined by indicator species.) These indicator species are: American Marten, Three-toed woodpecker, Northern flying squirrel, Fisher, Barred owl and Pileated woodpecker. In other words, since these animals represent a dense web of animal life lower down the food chain, once their habitat is gone, so are the hundreds of lesser species also dependent on that habitat. I recommend the Minister consult with his Departmental biologists to explore these scientific findings. There can be no beneficial economic activity where future generations are substantially deprived of their ability to benefit from and enjoy these forest species. We need to see them endure into the future.

In light of the above, one could argue that if the Minister lets the contracts go unchallenged, he will be at risk of abrogating his legal responsibilities under *The Crown Lands and Forests Act*. S. 3(1) of the *Act* states "the Minister is responsible for development, utilization, protection and integrated management of the resources of Crown Lands, including (c) habitat for maintenance of fish and wildlife populations. If the Minister allows the AAC to be increased by 20% as per the forest strategy, he will be **wilfully and knowingly presiding over the predicted (by his staff) extirpation from Crown land of the above-noted indicator species** and their associates.

He will also be undermining the *Biodiversity Strategy* (2009) brought in by the previous Liberal Government by enabling increased levels of cutting, size, timing and adjacency of clear-cuts not previously permitted. Almost half of the wood volume to be cut under the increased harvest allocation will come from previously designated 'special management areas,' so-called because of their importance and role in the lifecycle of various types of wildlife. The federal Government has committed to targets protecting fully 17% of Canada's lands and inland waters by 2020 under the UN Strategic Plan for Biodiversity (2010, Nagoya, Japan). **New Brunswick has protected only 4% of the province, well behind every other province in Canada**, save Prince Edward Island. The Province will have difficulty improving its situation by 2020 because the forestry contracts will require compensation to be paid to forest companies should any additional large areas of Crown land be set aside for conservation. This is an **unacceptable, undemocratic constraint on a publicly-owned resource, and needs to be rectified immediately.**

Following the Select Committee on Wood Supply's public hearing process and its report, New Brunswick citizens were surveyed in 2004 and again in 2014, by Professor Tom Beckley of the University of New Brunswick and Ms. Solange Nadeau of the Natural Resources Canada. Both surveys showed that New Brunswickers value the Crown forest for its natural environmental qualities first and foremost, with industrial fibre production ranked at the lowest level of concern. This strongly suggests a profound **misalignment of government's allocation of Crown resources and the will of the people**. As we have seen, this manifests itself in widespread discontent and cross-sectoral criticism of the forest strategy in its present form.

Furthermore, none of the contracts signed by the Conservatives nor the operational documents that followed (Forest Management Manual, etc.) has had any public input from New Brunswickers. As a result they are **entirely lacking social licence**. While there is no hard and fast definition of social licence, published attempts at definition "*...typically note that social licence exists when a project has ongoing acceptance or approval within the local community and other stakeholders. In the Commonwealth (including New Brunswick) social licence is granted when most of the public agree that what will be done to the Monarch's land is acceptable.*" (2) The sole mention of social licence in the Forest Management Manual is completely inadequate, narrowly referring as it does to "keeping roadways open and in passable condition to allow traditional public access for recreation" and to "harvest activities [that] will respect Crown Angling Leases, Heritage Rivers" etc., through buffers. This is hardly fulfilling the definition of social licence, and sets a bad example for future projects seeking this societal acceptance.

Finally, I believe there should in general be permitted no business strategy that irreparably changes and impoverishes our land, air or water, or that prejudices other New Brunswickers and their potential business initiatives. When the *Crown Lands and Forests Act* (1982) is revoked to evolve a greater diversity of *sustainable* forest-based economic activity, we will need to have healthy, functioning forests to provide for these enterprises, such as community forestry, value-added manufacturing or food products, cellulose packaging and others. They should not have been materially replaced by monocultures of the sort envisaged by the Conservative strategy.

Let us as a province start anew to build a truly diversified, sustainable forest industry that enriches not only our forests, but a broad cross-section of New Brunswick society. This is achievable, if we just start now.

Sincerely,

ORIGINAL SIGNED BY

Margo Sheppard

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cc. David Coon, MLA Fredericton South

David Alward, Former Premier of NB

(1) World Wildlife Fund, Living Planet Index (2014)

[http://wwf.panda.org/about\\_our\\_earth/all\\_publications/living\\_planet\\_report/](http://wwf.panda.org/about_our_earth/all_publications/living_planet_report/)

(2) Bunnell, F. 2013. "Social licence in British Columbia: Some implications for energy development." *Journal of Ecosystems and Management* 14(1):1-16.)

<http://jem.forrex.org/index.php/jem/article/viewFile/550/492>