

**Comments to the Public Hearing on the Sustainable Development Goals Act (Nova Scotia)
Monday Oct 28, 2019 at Province House**

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Whereas

- Forests cover ~75% of the Nova Scotian landscape and with surface waters (lakes, streams, wetlands) constitute the pre-eminent habitats of Nova Scotia's terrestrial landscape.
- The natural forest over most of the landscape is a mixed Acadian forest dominated by temperate latitude species, with boreal forest species dominating only under restricted localized conditions such as boggy ground, high elevations and exposed coastal areas.
- We have the most intensively exploited forests in Canada historically and currently.
- As a result of intensive exploitation, our forests are highly degraded in regard to productivity, species composition, old forest biodiversity, carbon storage, and production of high value wood.
- Repeated and extensive burning following settlement by Europeans until the mid-20th century, and clearcutting/management-to-favour-softwoods from the mid 20th century on, has resulted in extensive "borealization" of our forests, which ill-equips our forests to adapt to climatic warming.
- Inherently poor soils over 60% of our landscape in combination with acid rain have exacerbated forest degradation with severe impacts on aquatic biodiversity; it is recognized that clearcutting contributes to forest degradation and aquatic acidification.
- Our increasing supply of "low value wood"/declining supply of "high value wood" has meant forestry in NS has become increasingly dependent on Industrial (Intensive) Forestry methods and systems in order to benefit from economies of scale and to adapt to the loss of high value wood - even sawmills now gain much of their profit from chips produced by clearcutting, while those same practices reduce the supply of high value wood (and old forest habitat) over the mid to long term even further. Currently Industrial Forestry is focussed on harvesting in SW Nova Scotia, our last remaining woodbasket (area of old forest and high wood volumes). As Industrial Forestry caters to global markets, this type of forestry continuously reduces the workforce per unit output in order to remain competitive, and thus has progressively become less significant as an employer and source of prosperity in NS; at the same time it has become more dependent on government handouts (direct or indirect) as inducements to remain in NS.
- One alternative market for low value wood being pursued by government if/when one or both of our remaining pulp mills goes under is for bioenergy and the like (biofuels, bioplastics) which are touted – commonly without documentation - as being carbon neutral. However, there is now an abundance of evidence that many if not most such schemes – and notably the Biomass Plant at Port Hawkesbury - increase production of CO₂ relative to fossil fuels and fossil fuel feedstocks over "meaningful timeframes", i.e. the next 20 to 50 years.
- It is broadly recognized that forests are the most important routes of carbon capture and storage in terrestrial systems globally.

- GHG-related climate change since ~2000, combined with past management practices, has resulted in dramatic increases in frequency, intensity and extent of forest fires in western NA forests, and through much of the Boreal forest, with these forests now becoming net emitters of GHG rather than major sinks for carbon. At the same time, if for different reasons (notably economic desperation), the Amazon and other tropical and subtropical forests that have been major sinks for carbon are seeing increased frequency of fire to the point they also are becoming sources rather than sinks for carbon.
- Such developments put increasing value and onus on those of us in eastern NA, where temperate forests much less prone to fire occur, to manage our forests for carbon capture and storage, especially given that we are also a wealthy part of the world; for NS with its now highly degraded forests, increasing carbon storage in the form of older trees, .e.g. by “proforestation” (essentially increasing the length of harvest rotations), would also greatly benefit biodiversity and in the longer term provide higher value, more inclusive economic opportunities.

I urge that

(i) the need for open, transparent, independent GHG accounting (including e.g., LCAs and models) in all aspects of climate change mitigation be recognized in the Act, e.g., 4 (c) could be modified to read

4 This Act is based on the following principles:

... (c) climate change is recognized as a global emergency requiring urgent actions, those chosen in part on the basis of open, transparent, and independent GHG accounting of their potential benefits”

(ii) that the preeminent role of our forests, *potentially*, in mitigating climate change, in biodiversity conservation and as a vehicle for sustainable prosperity be explicitly recognized in the Act, e.g. under #6 to add as a focus area

6 Goals and initiatives established under this Act and the regulations must align with the following focus areas:

- ... (x) our forests and their potential role in climate change and adaptation, biodiversity conservation, and creation of circular and inclusive economies

Detailed goals in relation to climate should subsequently be incorporated in the strategic plan cited under item 8: “Climate Change Plan for Clean Growth”. This plan is scheduled to be completed “prior to Dec 31, 2020”.

I appeal to the Government to begin public consultations on the Climate Change Plan well before the due date, e.g. on Nov. 15, 2019.

Respectfully submitted by

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