



This submission is being made in response to the request for public comments on the issues raised in the document entitled "A Blue Print for Success: Ontario's Forest Strategy"

In the section for Promoting Stewardship and Sustainability it states part of the 2030 goals are to:

- Modernize and adapt forest management planning process to maintain the sustainability of Ontario's Crown forests.
- Ensure steps are being taken to help Ontario's forests adapt to a changing climate.
- Identify opportunities for Ontario's forests to help in our fight against climate change.

This paper also states that the province plans to "... determine the types of actions that would be most effective in increasing the growth potential of our forests", "Invest in the next generation of forestry products", and "Grow the diversity of international markets for Ontario wood products".

We would like to point out that Mikro-Tek, an Ontario-based biotechnology company, has developed a next generation forest management technology that has been proven to increase the growth potential of the forest. This forest management technology has been extensively field tested at commercial scale in the Canadian boreal forest, as well as in international markets where projects have resulted in 1.4 million offset credits being registered under the Verified Carbon Standard (VCS) to date.

Based on our Ontario boreal growth data Mikro-Tek has modelled the carbon sequestration rates that result from the application of this technology on re-forestation sites and, assuming it is applied to 70 million seedlings per year, these sites would generate:

- 1 million offsets at a cost of \$19.44 per tCO₂ by 2030
- 4.1 million offsets at a cost of \$10.14 per tCO₂ by 2040
- 9.1 million offsets at a cost of \$6.86 per tCO₂ by 2050
- 16 million offsets at a cost of \$5.18 per tCO₂ by 2060

The models indicate that Crown forests could be used to generate significant volumes of carbon offsets at a price below well the currently proposed carbon tax, and that the technology could significantly contribute to Ontario's 2030 and 2050 GHG reduction targets.

To implement this technology on Crown re-forestation sites in Ontario, a change in provincial forest management policy would be required to allow (i) third parties to apply forest management technology on Crown sites, and (ii) an agreement by the province to transfer to the third party the resultant offset credits generated.

If these suggested changes are made to the provincial forest management policy, third party proponents could raise the funds required to undertake forest management projects in exchange for the carbon offset credits generated. By assessing the growing international market interest in carbon financing, we could help Canadian companies and the province meet both compliant and voluntary GHG reduction targets. More specific information on Mikro-Tek's forest management technology, growth data, and carbon models can be obtained by contacting the undersigned.

Thank you in advance for considering these suggestions.

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