

Department of Development &
Property



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June 18, 2021

Ministry of Natural Resources and Forestry – FID – Forest Economic Section
70 Foster Drive, Suite 400
Sault Ste. Marie ON P6A 6V5

Submitted Online Via the Environmental Registry of Ontario

RE: Support for ERO# 019-3514, Ontario's Draft Forest Biomass Action Plan

Dear Ms. Jackson,

The County of Renfrew wishes to voice its support for Ontario's Draft Forest Biomass Action Plan, as posted Environmental Registry of Ontario Number 019-3514. There are approximately 6,900 people in Renfrew County directly or indirectly employed by the forest sector, a significant number for this area with a total population of just over 100,000 and about 43,000 households. We hope that the Action Plan will result in new biomass projects and economic development, and enhance the existing forest sector in Renfrew County.

We offer the following comments for consideration as you develop the final Action Plan.

- Forest biomass, in the form of residuals from mills, has long played an important role in Renfrew County's forest sector. We are fortunate to have existing destinations for bark, chips and sawdust in local successful mulch, MDF and bio-oil manufacturers. However, biomass and residuals can also become a significant cost and environmental issue for operations without a strong market for these by-products.
- Forest biomass also includes low-end materials with limited markets in Central Ontario. There is a pulpwood problem in Eastern Ontario, and we hope that the final Action Plan includes solutions to address the issue of utilizing pulpwood roundwood. Destinations for pulpwood are limited, somewhat unpredictable and involve significant trucking costs from Renfrew County. It is important for existing sawmills in Renfrew County, as well as the future forest, to ensure there is a destination for pulpwood roundwood. Areas that are bypassed due to high pulpwood components are hurting sawlog availability, as well as silvicultural goals.
- We are pleased to see private and other forested lands mentioned (pg.10) as a potential source for forest biomass. However, it should be noted that the Managed Forest Tax Incentive Program does not technically support implementation of forest management but rather encourages landowners to get to know their woodlot. Increased programming by MNRF, similar to Stewardship programs and foresters outside the Area of the Undertaking, would assist in helping landowners embrace forest management on their properties through education and outreach.

- An action for incentivising new development areas or community service upgrades to consider co-gen community/district heating would be a welcome addition to Objective 3. This could lead to pilot projects and determination of feasibility in retrofitting small settlement and rural Ontario communities, especially those with mills prominent in the community (e.g. Eganville, Barry's Bay, Petawawa, Killaloe) to be powered by biomass. District heating satisfies about 60% of the heat demand in Swedish buildings, with about half of the supply to these systems coming from biomass¹. Perhaps there are lessons to be learned from how this came into place in Sweden.

Ontario's Draft Forest Biomass Action Plan sets an exciting stage for the future of the forest sector in Ontario. The addition of measurable targets would help measure progress and ensure the objective and actions of the strategy are fully realized. We appreciate MNRF's efforts in working toward a stronger forest sector and look forward to seeing the Action Plan be finalized implemented.

Sincerely,



Craig Kelley, CMO, Dipl.M.M., Ec. D
Director of Development & Property



Lacey Rose, R.P.F.
County Forester

c: Minister John Yakabuski, Ministry of Natural Resources and Forestry
Ian Dunn, President & CEO, Ontario Forest Industries Association

¹ K. Ericsson, S. Werner. [The Introduction and Expansion of Biomass Use in Swedish District Heating Systems.](#) Biomass and Bioenergy, 94 (2016), p. 57