

## Comments on Draft Biomass Action Plan

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The Mass Timber Institute appreciates that the Ontario Government wishes to encourage the use of biomass in Ontario. Shifting towards greater representation of renewables in the energy mix, much like shifting towards a greater representation of mass timber in the building materials mix, has the potential to help rebalance the sustainability equation and provide reliable economic opportunities for future generations. However, it is important that wood that could be used for mass timber or other value-added applications are not diverted into the bioheat and biofuel products stream as part of this action plan.

It is likely that the barrier to fiber access in Ontario is economical rather than regulatory. Provincially, only one half of the available harvest volume across the managed Crown forest area has been cut in any given year since 2009. The number of mills in the province, and therefore the number of markets for this fiber, has also declined since then. Mass timber and biomass together represent an opportunity to unlock this additional fiber. Innovation in mass timber mill technology and supporting the establishment of small mass timber mills will not only make biomass more economically viable, but it will also provide a major value-added opportunity for the province to participate in the emerging mass timber markets in Canada, the United States, and Internationally.

The technology does indeed exist. Lathe and sawmill technology in China, Europe, and elsewhere in Canada clearly demonstrate that some 'sub-optimal' wood (e.g. small diameter, hardwoods) by typical Canadian standards can be used to produce the veneer and sawn lumber building blocks necessary to produce mass timber. This wood can and should be used for mass timber. Using the mill residuals (which have been paid for via stumpage already) as a source of bioheat and bioenergy is much more likely to be economically viable and promote increased efficiency of use.

At the Mass Timber Institute, we believe it is important that when a tree is cut, it should be used in the most valuable way possible. For wood that can be used to manufacture mass timber, including small diameter wood and hardwoods without existing markets, we believe that mass timber is the most valuable application. Importantly, we do not support taking any existing wood away from license holders, but rather using combined mass timber and biomass facilities as a value-added strategy for the forest sector and to unlock access to additional fiber.

However, much work remains to be done in this field. A complimentary 'mass timber action plan' may be worth considering in the future.

**Anne Koven PhD, R.P.F. (Hon.)**



Director, Mass Timber Institute  
University of Toronto