



July 20th, 2023

Ms. Sharon Rew
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Office of the Assistant Deputy Minister, Provincial Services Division
Ministry of Natural Resources and Forestry
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Submitted via email: affes.prevention@ontario.ca

Re: Canadian Wildland Fire Prevention and Mitigation Strategy

Dear Ms. Rew,

Thank you for the opportunity to inform Ontario's contribution to the CCFM *Canadian Wildland Fire Prevention and Mitigation Strategy*. The Ontario Forest Industries Association (OFIA) represents 48 companies across Ontario, managing approximately 32 million hectares of Sustainable Forest License (SFL) area. Ontario's forest industry currently employs 142,000 people across all regions of the province and generates \$20 billion in revenue annually.

The OFIA and our member companies are committed to addressing the growing risk of wildland fire in Ontario. Within the boreal forest, fires have had a key role within the ecosystem, naturally influencing forest structure and function over time. However, the projected impacts of climate change are predicted to increase the severity and frequency of forest fires¹². Given this, our members recognize the importance of sustainable forest management in contributing to landscape-scale solutions that support forest health and resiliency while providing economic opportunities for local communities.

The continued intergovernmental collaboration on solutions to address unwanted forest fire activity has become increasingly important to our sector and northern communities. To support Ontario's contribution to the CCFM *Canadian Wildland Fire Prevention and Mitigation Strategy*, we would like to provide input on the following in response to the questions raised in the Participant Information Package:

1. Does the draft vision speak to you? Why or why not?

In 2020, the CCFM compiled [*A Shared Vision for Canada's Forests: Toward 2030*](#), which established the following vision statement:

¹ McAlpine, R.A. 1998. The impact of climate change on forest fires and forest fire management in Ontario. Pp. 21-24 In *The Impacts of Climate Change on Ontario's Forests*. Ont. Min. Nat. Resour., Ont. For. Res. Inst. Sault Ste. Marie, ON. For. Res. Inf. Pap. No. 143. 50 p.

² Flannigan, M.D., K.A. Logan, B.D. Amiro, W.R. Skinner, and B.J. Stocks. 2005. Future area burned in Canada. *Clim. Change* 72: 1-16.

“Canada’s sustainable forest management practices maintain resilient, healthy forests that support vibrant communities, stronger collaborations with Indigenous peoples and competitive economies” (pg 4).

The CCFM Strategy discussed Collaboration with Indigenous Peoples, Innovation, Wildland Fires and Other Disturbances, Climate Change, and Canada’s Environmental Reputation as focus areas. These focus areas would all be relevant to a *Wildland Fire Prevention and Mitigation Strategy*.

Given the time and effort to establish the broader 2030 Strategy for CCFM initiatives, greater clarity on how the CCFM *Canadian Wildland Fire Prevention and Mitigation Strategy* builds on and aligns with the existing *Shared Vision for Canada’s Forest: Toward 2030* would be recommended. We are, however, supportive of including a ‘whole-of-society’ within the proposed Vision, as this creates a larger solution space, particularly for the forest sector to contribute.

2. Do the outcomes (the expected changes) in the Strategy resonate with you? Why or why not? Please consider each outcome area: influencing capabilities, influencing actions, and influencing future conditions.

As written, most of the intended outcomes remain too broad and need a clear direction for the intended audience. For example, “broaden awareness” should be rephrased to “broaden awareness of the role forest management can play in helping to mitigate forest fire”.

We would also encourage the inclusion of an outcome specific to supporting innovative/ proactive forest management practices to curb the impacts of climate change to improve resiliency and fire susceptibility (e.g., pest and disease epidemics), with an emphasis on understanding landscape-scale fire risk exposure. This is critical information to ‘broaden awareness’, and this information must be accessible to communities to understand risk and take action. Concepts applied through the FireSmart program could be scaled up with appropriate information about fire/forest health risks. Furthermore, tools such as forest thinning, prescribed and cultural burning are examples of proactive actions that can be enabled at the landscape scale through risk assessments and using a ‘whole of society approach’ to scale action and reduce risk. Programs that are doing this currently include FireSmart and the BC Forest Enhancement Society. In particular, connecting fuel reduction projects to bioeconomy opportunities can increase the cost recovery of these approaches - while reducing greenhouse gas emissions and providing alternate energy sources for local communities.

We also strongly recommend that the CCFM continue to build on lessons learned from existing Wildfire initiatives to inform the next steps. Most notably, within the previous [*CCFM Wildland Fire Strategy: A 10-year Review and Renewed Call to Action*](#), human resource pressures were raised as a key challenge due to a large number of retirements, a loss of institutional knowledge, broader shifts in market demand for labour, constraints to budgets. We understand that this continues to be a significant challenge for wildland fire management agencies and needs to continue to be a focus area for this new Strategy. Specific solutions should be aimed at reducing barriers for individuals to apply for forest fire positions and retaining personnel, such as

providing housing in remote areas, covering costs for training, finding opportunities within the province to extend seasonal work (e.g., aerial surveys for species at risk), and revisiting the overtime pay structure. Furthermore, identifying opportunities to mitigate costs in the longer term (e.g., strategic investments in prevention, mitigation, and preparedness) could help address long-term demands on the workforce.

We also noted that changing climatic conditions continues to be a challenge in mitigating and adapting to wildfire. The federal and provincial/ territorial governments have allocated significant resources to better understand climatic trends and strategies to adapt and mitigate a changing climate. We recommend building on existing initiatives and research to better understand potential gaps in implementing strategies identified to support a Pan-Canadian wildfire mitigation and adaptation strategy. To enable this, the CCFM should consider taking stock of what other jurisdictions have implemented (e.g., the US ‘Fireshed’ mapping and Alberta community forest fire risk mapping) to help inform and prioritize where further action is required. The ‘flexible approach’ and concepts around incentivizing positive action are essential, given that the fire prevention and mitigation strategies may differ in different provinces or regions of Canada.

3. In what ways, if any, could your organization contribute to what is outlined in this Strategy?

The forest sector has benefited from early leadership from the CCFM in understanding risk through the CCFM Climate Change Vulnerability Guidebook. These vulnerability assessments provide a helpful exercise for provinces to prioritize opportunities that will better enable climate change impacts.

As of recent, there has also been a surge of professional development opportunities for Professional Foresters on adaptation (e.g., UBC Climate Change Adaptation micro-certificate), in addition to other opportunities to mainstream climate-smart forestry across Canada and the US (e.g., SFI Climate Smart and Fire Resilient Indicators). Given this, regulated professionals across our sector, such as Registered Professional Foresters, can provide expertise on how forest management practices can be better utilized in regions outside forest management areas (e.g., parks) to promote more resilient forests. For example, in Jasper National Park, a forest management plan was developed in collaboration with Canfor to conduct a mountain pine beetle salvage to reduce fire risk.³

With additional support, we have highlighted more opportunities for the forest sector to further contribute to progress under the Strategy under our response to question #5.

4. How will we know if our efforts are contributing to changes in wildland fire prevention and mitigation? What could help or hinder our efforts.

³ Jasper National Park Fuel Reduction (2022). Canfor Corporation. Source: <https://www.youtube.com/watch?v=TkOFXZiH28k>

We recommend that the CCFM re-visit existing initiatives such as the “[Action Plan 2021-2026: A Roadmap for Implementing the Canadian Wildland Fire Strategy Using a Whole-of Government Approach](#)” as a starting point to determine what initiatives have been the most successful and where barriers have been identified. We would also strongly encourage Ontario to share lessons learned from the [Wildland Fire Management Strategy](#) with CCFM delegates.

We also propose working with the forest sector to incorporate key performance indicators or metrics (e.g. fire starts vs. areas burned) to measure success. As an example, a recent study, “*A Case-Crossover Study of the Impact of the Modifying Industrial Operations Protocol on the Frequency of Industrial Forestry-Caused Wildland Fires in Ontario, Canada*”⁴ has qualitatively measured the impact of the Modifying Industrial Operations Protocol (MIOP), which could help inform Ontario’s contribution to mitigating fire risk.

5. What types of support, if any, will your organization need to remain engaged in Wildland Fire Prevention & Mitigation? What does meaningful support look like?

Over the last several years, our sector has become more limited in our abilities to support the province in fighting unwanted forest fire activity due to increased liability and insurance concerns. We recommend that the Province use this opportunity of a Pan-Canadian forest fire strategy to develop a more collective approach to overcoming this challenge. An example of a jurisdiction that has implemented a solution to address insurance concerns is Saskatchewan, with the development of a Wildfire Prevention and Preparedness Standard, which clarifies that contractor’s insurance will provide coverage where it overlaps with active operation areas and/or the Ministry approves the action of a fire elsewhere in a forest management unit. Moreover, additional training programs and funding to better equip willing forest sector personnel to conduct initial attacks when it is safe to do so could help alleviate resourcing demands for initial attacks.

There is also an opportunity to better leverage sustainable forest management practices to help address fire risk over the long term, such as active forest management solutions that target harvests in forests deemed more susceptible to forest fire activity (e.g., higher fuel loads) – in addition to capturing carbon into wood products that can be used by society. Regulatory and economic barriers must be better understood and addressed within provincial and territorial forest management planning frameworks to better leverage opportunities such as these. For example, salvage harvest operations need to occur shortly after a forest fire and are typically located in remote regions with low-grade fibre that are difficult to access. Solutions to promote salvage harvests must address regulatory barriers (e.g., timing for approvals/ permits) and financial incentives (e.g., lower stumpage).

⁴ Granville, K., Wollford, D., Dean, C. B., & McFayden, C. B. 2022. A Case-Crossover Study of the Impact of the Modifying Industrial Operations Protocol on the Frequency of Industrial Forestry-Caused Wildland Fires in Ontario, Canada. *Journal of Agricultural, Biological, and Environmental Statistics*, Volume 28, Number 2, Pages 219–242. <https://doi.org/10.1007/s13253-022-00497-z>

With additional public funding of critical forest infrastructure, the sector can also help maintain access, particularly in rural areas, required during emergency evacuations or as detour routes to avoid areas with active fires. During this year's active fire season, many of our member companies were notified by the province that the use of logging roads would be necessary due to the closure of highways and to ensure public safety.

6. Do you have any other comments to share?

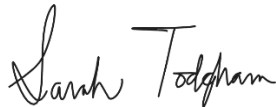
This Strategy needs to consider opportunities to connect to broader initiatives related to biodiversity, species at risk recovery, protected area planning, and climate change to ensure they are not being developed in silos.

For example, tens of thousands of hectares of caribou habitat have burned over the past several fire seasons. Within caribou habitat, unmanaged protected areas create a significant fuel risk and act as a catalyst, spreading fires into neighbouring managed forest areas. Wildfire managers are responsible for deciding whether to destroy, protect, and renew species at risk habitats when choosing to observe, suppress, or prescribe fires. Given the complex nature of this topic, we suggest that a holistic approach be applied to a wildfire strategy to better inform management decisions in the future.

If you have any follow-up questions on the information provided in this submission, we would be happy to discuss this further with you and your team. I can be reached at 519-933-1231 or stodgham@ofia.com.

We look forward to continuing to work with you to support Ontario's approach to fire management within a broader Pan-Canadian approach.

Thank you,



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CC Peter Henry, Director of Crown Forests and Land Policy Branch, Ministry of Natural Resources and Forestry