



**2024-25**

# **Provincial Budget Submission**

**Ontario Forest Industries Association**  
January 8<sup>th</sup>, 2024



# Ontario's Forest Industry By the Numbers

**\$21B**

total revenues

**72.6M**

trees planted

**\$4.4B**

contribution to the provincial GDP

**300M+**

seeds in aerial seeding

**142,000**

direct, indirect, and induced jobs

**\$60M**

renewal expenditures

**7.2B Tonnes**

Carbon Stored in Ontario's Public Forests

**25.5M Tonnes**

Carbon stored in wood products from Ontario's  
Managed Forest

## Introduction

---

Since 2018, the forest industry has invested 3.6 billion dollars in Ontario. Autonomous vehicles, drones, robotics, advanced chemicals, machine learning, optimization, and artificial intelligence are commonplace across our industry's operations. The pace of change and innovation will only increase as our industry meets a rising global demand for green energy and sustainable, low-carbon forest products.

An ambitious growth plan, as outlined in *Ontario's Forest Sector Strategy* (the "Strategy"), a well-managed forest resource, and an "open for business" attitude have formed the groundwork for an incredible green economic growth opportunity in northern, rural, and Indigenous communities across the province. Released in 2020, the Strategy is committed to utilizing the full annual allowable cut (AAC) of 30 million m<sup>3</sup> by 2030, sustainably doubling the sector's current footprint.

Ontario, however, is not immune from global economic and market pressures. High inflation, rising interest rates, workforce shortages, protectionist trade policy, and declining or stagnant market segments represent significant and challenging headwinds. These are complex issues that require a whole-of-government approach. Attracting new investment, developing new products, and growing the sector are important, yet maintaining its existing footprint is essential.

Ensuring a thriving forest sector requires a fully integrated network of forest management planning, road infrastructure, competitive woodland and mill operations, a skilled workforce, and open market access. Above all else, Ontario must keep our public forests working for the people and meet the increasing global demand for sustainably sourced forest products.

To assist Ontario in navigating these complex issues, the Ontario Forest Industries Association (OFIA) has developed its 2024-25 Pre-Budget Submission to serve as a roadmap to success in Strategy implementation. Acting on the following recommendations will unlock the vast economic and environmental potential of Ontario's forest resources and contribute to a better Ontario.

## **Summary of OFIA's 2024-25 Recommendations**

Implement *Sustainable Growth: Ontario's Forest Sector Strategy (the Strategy)*, focusing on key competitiveness measures:

- 1. Prioritize biomass and pulpwood market development to improve forest sector competitiveness and resiliency;**
- 2. Improve forest road infrastructure, leveraging private investments;**
- 3. Improve market access and maintain the effectiveness of Ontario's adaptive and sustainable forest management framework;**
- 4. Address the cumulative costs of carbon pricing;**
- 5. Position Ontario as a globally competitive jurisdiction through red tape and cost reduction;**
- 6. Develop the workforce of the future and enhance forest community livability.**

## **1. Prioritize biomass and pulpwood market development to improve forest sector competitiveness and resiliency.**

---

OFIA recommends:

- a. Ensure a multi-year commitment and expansion to the \$19.6 million *Forest Biomass Fund*;
- b. Modify provincial energy policy to procure greater amounts of forest biomass-fired electricity, supporting community energy and district heating projects;
- c. Prioritize the global competitiveness of Ontario's pulp and paper sector and potential commercialization of innovative products and advanced chemicals;
- d. Incentivize greater use of low-carbon forest biomass within industrial (e.g., steel, mining, chemical, and forestry facilities) processes through Ontario's Emission Performance Standard (EPS) program and innovation funding.

Every year, a sustainable yield of approximately 14 million m<sup>3</sup> of timber is harvested from Ontario's managed public forest. This material works through a highly integrated network of mills and facilities, producing a wide range of products, materials, and secondary products.

Market development within biomass and pulpwood markets is perhaps the greatest opportunity to enhance the supply chain and bolster competitiveness across Ontario's forest industry. Alternatively, a contraction within this market segment poses a significant threat to the future viability of the entire forest sector.

Canada used to be the largest market pulp-producing country in the world but continues to lose share to lower-cost mills in other regions. While Ontario's Northern Bleached Softwood Kraft (NBSK) remains highly sought after for its desirable technical properties, some facilities require significant capital investments to stay competitive. North America competes with low-cost international jurisdictions like Southeast Asia and South America, which have seen significant capital investment in new mills and intensively managed tree plantations over recent years.

The OFIA strongly supports initiatives such as Ontario's \$19.6 million *Forest Biomass Program* and *Forest Sector Investment and Innovation Program* that aim to maximize the use of wood residuals, reduce the need for carbon-intensive fuels, and avoid unnecessary pressures on landfills. Ensuring the success of these programs will help sustain the circular bioeconomy and the integration of Ontario's forest sector. Government support for existing pulp, paper, and biomass facilities is essential to the sector's long-term success.

Bioenergy production, the most deployable and scalable forest biomass technology currently available, presents an enormous opportunity to assist in this goal. Increasing volumes within existing power purchase agreement (PPA) generation facilities, developing community projects, supporting district heating projects, and incentivizing the use of forest biomass in other industrial processes are not only opportunities but are essential to the success of the industry.

## **2. Improve forest road infrastructure, leveraging private investments.**

The OFIA recommends the following to improve Ontario's *Forest Access Roads Funding Program*:

- a. Make an inflationary adjustment of \$15 million/year;
- b. Make a \$5.6 million/year increase to address end-of-life road, bridge, and water crossing infrastructure.

The forest industry builds and maintains public forest infrastructure on behalf of the people of Ontario. This public infrastructure provides essential social, cultural, wellness, and economic opportunities for First Nations and all citizens of Ontario by providing access to the Province's abundance of parks, natural spaces, working forests, critical minerals, and communities. Thousands of Ontario citizens, businesses, anglers, hunters, cottagers, and emergency services depend on a safe and well-maintained public forest road network.

The current funding envelope of \$54 million for the roads program is no longer adequate to meet the infrastructure needs of public and private users of Ontario's forest road infrastructure. Since 2018, the road building and maintenance sector has seen exceptionally high inflation – increased fuel, equipment, and wage costs have significantly weakened the program's purchasing power over the last six years.

Through a comprehensive survey of all forest managers in the province, we estimate a \$20.6 million/year funding deficit. This data reflects annual road maintenance, inflation, and replacing end-of-life bridges, water crossings, and roads.

Improving this program will provide an incredible economic development opportunity for all northern and rural communities, Indigenous and non-Indigenous, right across the province.

### **3. Improve market access and maintain the effectiveness of Ontario's adaptive and sustainable forest management framework.**

---

OFIA recommends:

- a. Continue to defend Ontario softwood lumber producer's interests in the ongoing trade dispute with the United States;
- b. Work with industry to address non-tariff trade barriers, e.g., "deforestation-free" procurement bills and "forest degradation" initiatives;
- c. Continued implementation of the *Ontario-Canada Boreal Caribou Conservation Agreement*, focusing on caribou range-boundary review and other scientific methods to assess self-sustaining caribou populations;
- d. Work with the OFIA and forest managers to explore potential contributions to Other Effective Area-Based Conservation Measures (OECMs);
- e. Work with the OFIA and forest managers to ensure forest management guidance supports the objectives of Ontario's *Forest Sector Strategy*.

Governments play an essential role in maintaining a positive reputation with customers and honouring commitments to reduce trade barriers within critical export markets. Over \$800 million of Ontario softwood lumber producer's money is on deposit in the U.S. Treasury due to the current iteration of the dispute. This is money that could be re-invested into Ontario facilities and communities. We ask Ontario to continue the rigorous legal defence of its programs and stumpage system, which is currently being investigated by the U.S. Department of Commerce. This issue needs to be raised at every opportunity with Canadian and American officials and viewed as a top diplomatic priority.

Members of the OFIA remain committed to upholding the highest standards of sustainable forest management to maintain ecological processes and conserve biological diversity. We strongly encourage the Ontario government to continue communicating our adaptive forest management framework's effectiveness to the federal government, stakeholders, and defending our industry in the face of misinformation and activist campaigns.

Ensuring our forests remain resilient under a changing climate requires human intervention through sustainable forest management. In pursuing a Federal protected area target, we are concerned that Ontario could erode the working forest landscape. Ontario must carefully consider how protected areas, OECMs, and ecological offsetting will impact the forest industry. We ask MECP and the MNRF to work with us to ensure the forest sector is fully recognized for its contributions to conservation and avoid unintended economic and environmental consequences.

Non-tariff trade barriers, such as "deforestation-free" procurement bills in New York and California, concern our industry. We ask that you continue working with your federal counterparts and state legislators to defend Ontario's world-class forest management system.

#### **4. Address the cumulative costs of carbon pricing**

OFIA recommends:

- a. Finalize the proposed approach to the redistribution of EPS proceeds to eligible facilities;
- b. Ensure projects beyond the property limits of facilities are eligible to receive EPS proceeds;
- c. Consider options to mitigate the impacts of the federal carbon fuel charge to the forest sector, evaluating the potential for a made-in-Ontario program.

The OFIA supports an Ontario-based carbon pricing program, and this long-term planning will provide stability for businesses looking to invest in Ontario. We believe that Ontario is better positioned to understand the needs and context of Ontario's emitters.

The world's leading carbon reduction jurisdictions have only achieved such significant progress due to massive increases in the use of forest biomass within industrial processes, combined heat and power, district heating, and electrical generation. Forest biomass is also a much more price-stable source of energy, something that has been highly beneficial to European countries. We view the EPS program as an incredible opportunity to position Ontario as one of these leaders and incentivize increased use of this valuable and sustainable material.

We strongly support using proceeds to create a fund to support research and development into decarbonization and implementing capital-intensive, low-carbon technologies. As an industry, we have made significant progress and investments in decarbonizing operations. Since 1990, Ontario's pulp and paper industry has reduced its greenhouse gas emissions by 56%. Addressing the remaining high-emitting processes will require new research, significant technological advancement, and large capital expenditures.

Re-injecting EPS proceeds into the industry will fast-track the adoption of new technologies and assist companies in making further investments in Ontario. Developing an Ontario fuel surcharge to replace the federal program would provide access to a larger pool of funds to help in this transition.

In parallel, we are concerned that the proposed federal *Clean Fuels Standard* will compound the impacts of the federal fuel surcharge on forestry operations and transportation. There presently are no viable alternatives to decarbonize the sector. We strongly encourage the government to consider ways to collaborate and support the industry through this transition.



## **5. Position Ontario as a globally competitive jurisdiction through red tape and cost reduction**

---

OFIA recommends:

- a. Ensure government initiatives align with the goals and objectives of the *Forest Sector Strategy* to reduce cost and administrative burden to the sector;
- b. Establish service standards, improve service delivery, and remove the need for low-risk approvals;
- c. Adjust and make permanent the 'fixed' portion of Crown dues for poplar and white birch stumpage to ensure that the rate is consistent with other provincial jurisdictions;
- d. Reduce current electricity costs while maintaining and enhancing existing energy programs (e.g., the Northern Energy Advantage Program, the Industrial Conservation Initiative, the Interruptible Rate Pilot, and the Industrial Electricity Incentive Program).
- e. Lower costs and reduce carbon emissions by increasing payloads on tractor-trailer configuration.
- f. Make the current reduction in provincial fuel tax permanent.

The OFIA fully supports this government's focus on red tape reduction and working together to reduce barriers.

The OFIA has repeatedly flagged cost competitiveness, the speed with which we conduct business, and streamlined approval processes as themes that continue to inhibit global competitiveness and negatively impact wood supply access. Initiatives (the Strategy, provincial policy working groups (TAT, SID, FMPAG), and policy changes) have supported a provincial mandate to reduce red tape and administrative burden. More work on these projects is required for the Strategy to succeed.

Burdensome and lengthy approval processes are a problem for the industry across all business areas. The lack of enforceable service standards has been raised within the industry's mill environment, forest management planning and operations, transportation, and human resource departments. Approvals are either unnecessary (e.g., low-risk), duplicative, or take excessive time.

We look forward to working with various ministries to address these issues in upcoming red-tape reduction bills.

The OFIA is thankful for the continued extension of gas and fuel tax cuts, ending June 30<sup>th</sup>, 2024. We hope to see this excellent initiative continue past the current expiration date.

## **6. Develop the workforce of the future and enhance forestry community livability**

---

OFIA recommends:

- a. Establishing a new "*Forestry Truck Driver Experience Grant*" to offset high insurance costs preventing new drivers from entering the industry;
- b. Recognize and streamline foreign credentials and commercial truck driving licenses;
- c. Remove the *Non-Resident Speculation Tax* from northern, rural, and remote communities.
- d. Continued investments into northern, rural, remote, and Indigenous communities.

Ontario's forest industry is hiring. Developing a sustainable workforce of the future will be essential for our industry's continued success and achieving the Strategy's goals. We ask the Ontario government to continue supporting the work being done with colleagues at the MNRF, the Ministry of Economic Development, Job Creation and Trade, and the Ministry of Labour, Immigration, Training, and Skills Development to fast-track new workers and new Canadians with relevant skillsets into the forestry workforce.

Transportation costs have increased significantly over the last six years, and trucking capacity has decreased. Increased capital entry costs, insurance, tire and fuel costs, and an escalating carbon tax are contributing to the trucking crisis within the industry. Furthermore, increased driver training costs, underwriting barriers, and premiums restrict new entrants while we manage an ageing and retiring workforce. We ask the Ontario government to work with the industry, licensing, insurance, and training agencies to develop a comprehensive strategy to alleviate the current trucking shortage.

The OFIA has partnered with Forests Ontario on *Bridging the Gap Between Ontario's Youth & the Provincial Forest Sector*, an Employment Ontario research project. This project investigated job vacancies and training requirements within the sector and provided critical insights into youth perceptions of employment within the forest industry.

The livability of forestry-dependant communities is central to attracting a new workforce. Continued healthcare, education, affordable daycare, and housing investments are necessary to ensure that all Ontarians enjoy the same quality of life. For example, the Non-Resident Speculation Tax (NRST) was intended to deter non-resident investors from speculating on the province's housing market. However, the NRST acts as a barrier to foreign workers filling critical roles in Ontario's small, northern, rural, and remote communities. This was clearly never the program's intent, and we ask that it be corrected.

This government has already invested substantially in infrastructure across the north, including roads and improved internet and cellular coverage, and we look forward to seeing that investment continue. In an increasingly digital age, communities across the north must have

strong technological and built infrastructure. Forestry-dependent communities must become more competitive in drawing residents, particularly new Canadians, through programs such as the *Rural and Northern Immigration Pilot*. The Province needs to consider incentivizing living in the north and enhancing the quality of life for those already there.

## **Conclusion**

---

The forest sector is integral to Ontario's history and critical to its economic, social and environmental prosperity. OFIA strongly believes we can create a better Ontario through working forests, leveraging visionary policies such as *Sustainable Growth: Ontario's Forest Sector Strategy*. We look forward to continuing productive dialogue and supporting sustainable economic recovery initiatives with the Ontario government.