OFIA

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Ministry of Natural Resources
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Submitted via email: wildlandfire@ontario.ca

Re: Modernizing Wildland Fire Management in Ontario

Dear Mr. Wurtele,

Thank you for the opportunity to provide feedback on the Ministry of Natural Resources (MNR) proposed steps to modernize wildland fire management in Ontario, as outlined in *ERO 019-8756: Modernizing wildland fire management in Ontario.* As evidenced by the record-breaking wildland fire season in 2023, there is a critical need to evaluate and identify innovative management approaches that support forest health and resilience and prevent unwanted forest fire impacts, thus contributing to the safety of rural and northern communities.

For 81 years, the Ontario Forest Industries Association (OFIA) has been the united voice of its members, representing over 50 companies across Ontario that responsibly manage over 27 million hectares of Crown and private forests. In Ontario, a robust regulatory framework provides direction for all levels of forest management planning activities to ensure the sustainable management and use of Crown forests for future generations.

This submission contains responses to the topic areas and questions raised within the *Modernizing Wildland Fire Management in Ontario: Discussion Paper* that we urge MNR to consider in the collective for the modernization of wildland fire management in the future:

Strengthen Collective Responsibility for Wildland Fire Management

Establishing a Wildfire Advisory Committee would be beneficial in providing leadership and support to guide implementation and resourcing. We recommend that forest industry representatives participate in the committee to help broaden awareness of the role that forest management approaches can play in preventing and mitigating unwanted forest fires. Outcomes from the committee should be aimed at enabling wildfire management programs that will support vulnerable Indigenous and municipal communities in partnership with the forest industry.

Improve Ontario's Awareness of Wildland Fire Risk

Through initiatives such as the CCFM *Canadian Wildland Fire Prevention and Mitigation Strategy*, we recommend that Ontario work with other provincial counterparts to learn from innovative practices and frameworks implemented or trialled in other jurisdictions. In particular, other jurisdictions use expert forecasting, LiDAR inventory, and worst-case weather patterns to evaluate fire risk assessments.

Recently, there has 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.

We would also encourage re-evaluating current approaches to raising awareness and communicating risk to the public (e.g., Smokey the Bear). Unplanned human-caused fires are destructive, and emphasizing the importance of preventing these incidents should continue. However, awareness should be broadened to include how planned fires (e.g., prescribed burns) can be an important tool for professionals to reduce future fire risk and support more fire-resilient and healthy forest landscapes.

Expand Prevention and Mitigation of Wildland Fire

It is recognized that out of the five objectives listed in the discussion paper, there is not a focused objective to explore the key role that forest managementcan play in promoting and maintaining healthy forest ecosystems and proactively mitigating the risk of severe wildland fires. In addition to the existing tools being applied to emulate natural disturbance patterns to maintain or enhance natural landscape structure, there are opportunities to leverage further forest management techniques such as controlled burns, thinning, prompt regeneration, and removal of hazardous fuels to help reduce fuel loads and promote biodiversity and forest resilience. Existing programs within the forest management planning framework, such as the *Forestry Futures Trust*, can be better leveraged with increased funding to support restoration activities outside their harvested areas severely impacted by fire or pest outbreaks, providing many benefits to society. Given this, we encourage the inclusion of an objective specific to leveraging innovative/ proactive forest management practices to curb the impacts of climate change to improve resiliency and fire susceptibility (e.g., pest and disease epidemics).

Furthermore, incorporating FireSmart techniques into landscape management decision-making processes is a valuable opportunity to enhance wildfire resilience. These techniques, which include strategic vegetation management, can significantly reduce the risk of wildland fires and their impacts on communities. Integrating FireSmart principles into broader forest management planning frameworks can also help to protect biodiversity and cultural values identified on the land base and contribute to safer, more resilient environments.

In particular, expanding active forest management in Ontario's parks and protected areas could decrease the likelihood of catastrophic fires, enhance forest health, and reduce the risk to adjacent managed areas, which, in many cases, have had significant silvicultural investments that need protection. In the case of Woodland Caribou Park, by some estimates, over 90% of the park has been burned over the past 12 years.

Enhance Preparedness and Response to Wildland Fire

The Provincial Forest Access Roads Funding Program provides funding to the forest industry to construct and maintain essential infrastructure essential for northern and rural communities. These roads

are used for recreation, transporting goods and services, and serve as a key artery for traffic during emergency evacuations or as detour routes to avoid areas with active fires. Last year, the province announced an additional $6 million investment in the *Provincial Forest Access Roads Funding* Program, which has been beneficial in ensuring the maintenance of these essential access and emergency routes. Further increasing this funding will assist fire crews in having reliable access to some remote areas, enabling swift response to wildland fires. Improved road networks will also facilitate the transportation of necessary equipment and resources, ultimately enhancing our firefighting capabilities and reducing response times.

We also acknowledged that the province recently announced a $5 million investment to attract, retain and recognize firefighting staff for the 2024 fire season. Continued investment to support recruitment and retention efforts, including reducing barriers for individuals to apply for forest fire positions, providing adequate housing in remote areas, covering training costs, and finding opportunities to extend seasonal work, will be beneficial in securing personnel required to support forest fire fighting efforts.

Over the last several years, our sector has become more limited in our abilities to support the province in initial attacks of fighting forest fires due to increased liability and insurance concerns. We recommend that the Province continue to explore opportunities to develop a more collective approach to overcoming this challenge. Saskatchewan is an example of a jurisdiction that has made progress in overcoming this challenge 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 or the Ministry approves the action of a fire elsewhere in a forest management unit.

Strengthen Rules and Consequences

We recommend that MNR continue to focus on proactive measures and broaden public awareness to prevent forest fires. MNR can also play a key role in improving or enhancing training resources and availability to industry partners, ensuring a more consistent and appropriate application of requirements, and reducing incidents during higher-risk conditions.

Before considering additional compliance and enforcement measures, we recommend MNR evaluate existing measures to prevent fires through other complementary acts and voluntary measures (e.g., forest certification) to avoid unnecessary regulatory burden. Within the assessment, MNR should cross-check with provincial counterparts on existing legislative options supporting compliance. For example, in the forest industry, ensuring the safety of workers is of the utmost importance, which is why forest industry companies prioritize proactive measures to reduce the risk of forest fire activity, such as initial attack training and modification of operations when there is a higher fire risk. There is also the Industrial Operations Protocol, which informs how activities will take place and support the prevention and suppression of wildfires in forested areas within the fire regions during the fire season, usually April 1 - October 31. This includes informing whether operations should proceed normally, have a shortened or restricted shift, or shut down operations.

In the past, MNR has limited operations for an entire province region for several weeks, greatly restricting forest operations that could have been scoped down to a smaller geographic unit. Considering the prevention and mitigation processes in place for industry, we recommend that these broad-level approaches to restrict all public activities, such as Implementation Orders, should not apply to operations with protocols in place to reduce risk. If additional restrictions are deemed necessary due to significant risk, we recommend a more 'surgical approach' be applied (e.g., subregional), and these restrictions should be evaluated regularly to lift them as soon as possible.

Moving Forward

We recognize that potential revisions to the *Forest Fire Protection Act* (FFPA) were referenced in the discussion paper. As any proposed revisions to the FFPA are likely to directly impact our operations, we strongly recommend that the industry be involved before the next consultation to support the MNR in proposing and testing ideas to develop effective solutions that will be implementable.

We look forward to collaborating with the Ministry to modernize the approach and enable proactive forest fire management in the future.

Sincerely,

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