



SAVE OUR OLD FORESTS ASSOCIATION

Nova Scotia needs old forests.

Wednesday, July 30, 2025

Dear Minister Rushton,

I am writing concerning the Department of Natural Resources (DNR) plans to clearcut in the proposed Ingram River Wilderness Area as well as in the Beals Brook, Tobeatic-Tidney Extension and Chain Lakes Wilderness Areas. On the Harvest Plan Map Viewer, these plans for 'final felling' are identified as part of the High Production Forestry (HPF) leg of Lahey's triad. HPF involves clearcutting, spraying to kill broadleaf trees, planting to create softwood plantations then coming back and clearcutting again (if all goes according to plan.)

Clearcutting is the most destructive form of forestry practiced in Nova Scotia. The fact that it devastates biodiversity is tacitly recognized in DNR's own *High Production Forestry: Phase 2* document. '90% of Crown and protected areas land will always be committed to the two zones that prioritize biodiversity.' Biodiversity, in other words, will not be prioritized in the other 10%, the HPF zone of the triad. In fact, forests assigned to that zone will be subject to repeated clearcutting on a short rotation of 30-50 years.

What possible justification can there be for advancing plans to assign sites within proposed Wilderness Areas – areas of well-documented high conservation value -- to High Production Forestry before those areas have been assessed for permanent protection?

The Lahey Report

Accepting the inclusion of a zone for 'High Production Forestry' in the triad established by the Lahey Report represented a significant compromise on the part of environmental groups and the public in general.

Industrial forestry interests made compromises too and the recommendations of the Lahey Report were accepted by the government of the day in 2018 and by your government, Minister Rushton, when it came to power in 2021. As DNR's [Silvicultural Guide to the Ecological Matrix](#) puts it, quoting from the Lahey Report:

The Government of Nova Scotia has committed to implementing a triad system on public land that will 'protect and enhance ecosystems and biodiversity as the overarching policy priority, as they are the foundation of other values.'

Recognizing that the existence of the HPF zone runs counter to this ‘overarching policy priority’, DNR’s Phase 2 document not only caps the maximum amount of Crown land where HPF will be permitted at 10%, it also assures the public that the implementation of HPF will be very slow and that its feasibility will be carefully studied. Specifically, the document states that DNR expects to take 35 years to implement High Production Forestry.

The target date to assign 10% of Crown land to HPF, in other words, is around 2058.

The legislated deadline to protect 20% of Nova Scotia’s lands and waters is 2030.

Clearly, the identification, evaluation and designation of areas to be added to the Conservation leg of the triad must come first. Your own HPF Phase 2 document states: **“The (HPF) zone should not include any land where conservation and non-timber values are prioritized.”**

Collaborative Protected Area Strategy

Less than two years ago, Minister Rushton, you signed the [Collaborative Protected Area Strategy: An Action Plan to Achieve 20%](#). You agreed to work with Minister Halman to meet the 20% goal. The Action Plan laid out criteria for which areas should be prioritized for protection. It also highlighted Nova Scotians support for protecting 20% and their strong desire for collaboration, transparency and urgency.

To date your department has shown little willingness to collaborate with either Nova Scotia Environment and Climate Change or the public to achieve the agreed and legislated goal of permanently protecting 20%. Improvements to transparency that were apparent earlier have disappeared completely. As to urgency, the only urgency your department appears to be showing is to approve harvest plans in citizen-proposed protected areas. This was bad enough when the plans were based on ‘ecological forestry’ suitable for the Ecological Matrix, one of the two zones of the triad where DNR at least claims to be prioritizing biodiversity.

But now you are putting forward harvest plans that will destroy biodiversity, not once but repeatedly, in places that have been identified as having high conservation value. Instead of allowing the Department of Environment and Climate Change (ECC) to evaluate the area for addition to the conservation zone of the triad first, you are rushing to grab sites for HPF.

Broken Agreements

Far from prioritizing biodiversity, DNR is prioritizing clearcutting. This undercuts the entire rationale of the Lahey Report.

Lahey's foundational recommendation, namely that protecting and restoring ecosystem health must, from now on, be the "overarching priority" in how Crown land forests are managed in Nova Scotia, nonetheless left some room for intensive industrial short-rotation forestry.

DNR's arrogant overreach throws into doubt the whole carefully crafted compromise that allowed such disparate groups to accept the recommendations of the Lahey Report. As our province struggles with intense rainfalls and deadly floods, powerful storms, droughts and fire, the case for clearcutting at all on Crown land grows weaker and weaker.

What appears to be a deliberate strategy on DNR's part – stalling any progress in identifying areas of Crown land for conservation while rushing to identify areas for perpetual clearcutting -- is destroying a hard-won agreement, an agreement that pleased nobody but allowed for a more productive way forward. By tossing aside Lahey's recommendations, DNR is bringing this government into disrepute.

It is not just the Lahey Report that is being ignored. DNR under your leadership, Minister Rushton, is failing to meet the commitments made by your own government. DNR is failing to implement the Collaborative Protected Areas Strategy; failing to make progress on meeting the legislated goal of protecting 20% by 2030; failing even to make progress to meet the interim 15% target established in the Canada-Nova Scotia Nature Agreement.

Please reconsider. Withdraw the harvest plans that assign sites within proposed protected areas to High Production Forestry. Work with ECC to identify and designate substantial areas of Crown land for permanent protection. Work with Nova Scotians. People who care about nature are not the enemy. We want jobs and a healthy environment, building materials and wildlife, a livable planet and good healthcare. To get there we need, in the words of the *Collaborative Protected Areas Strategy*, 'urgent action, a collaborative approach, and a transparent process'. Please uphold your commitments and work with us.

I look forward to your response.

Nina Newington
President, Save Our Old Forests Association

cc:
Karen Gatien, Deputy Minister, Department of Natural Resources
Claudia Chender, Leader of the Opposition