



Pre-Harvest Waste Assessment (PWHA) – Q&A

Background:

The Premier in a mandate letter directed the Minister of Forests, Lands and Natural Resource Operations to find ways to enhance the utilization of post-harvest residue. The Minister endorsed a 13-point action plan recommended by the joint Forest Fibre Working Group (FFWG). One of the actions committed to enabling off-site scaling. The FFWG agreed to a voluntary process to:

1. conduct a waste assessment in advance of harvest commencement based on historical levels of waste (table to be included in the *Provincial Logging Residue and Waste Measurement Procedures Manual*),
2. for roundwood destined to a secondary manufacturing facility, designate it as a Special Forest Product (SFP),
3. for the incidental sawlog volume delivered to a secondary facility which falls below the waste benchmark thresholds, simply bill it at the statutory SPF rate of \$0.25/m³, and
4. for the incidental sawlog volume delivered to a secondary facility which exceeds the benchmark, bill at the SPF rate as well as the full sawlog rate of the cutting authority.

Q: What is a primary vs secondary?

A: A “primary” is a manufacturer who produces solid wood products from round logs (such as lumber or plywood). A primary inherently also produces residual fibre (chips, sawdust, shavings, bark/hog fuel). The residual fibre is then utilized by “secondary” manufacturers (pulp mills, pellet plants, Oriented Strand Board plants, electricity co-generation, etc). Although confusing, common vernacular also makes reference to “primary” timber harvesters, and “secondary” post-harvest timber harvesters who utilize forest residuals on landings and roadsides.

Q: Why is this process necessary?

A: There is a desire to enable fibre (that would otherwise be abandoned or burned) to be utilized concurrently with normal timber harvesting activities. Section 94.1 of the *Forest Act* requires that a waste assessment be completed prior to designating SFP. When a “primary” curtails production it can result in a deficit of residual fibre. The secondary manufacturer must then either also curtail production or source alternative fibre from the forest.

Q: To use the PWHA process, what approvals are needed?

A: Two approvals are needed. First, the waste assessment. Then the designation of SFP along with associated scale site authorization conditions. These approvals are administered at the District level.



Q: Who may apply?

A: Licensees which hold the following types of licences may apply: major licences as defined under section 1 of the *Forest Act*, Community Forest Agreements, and section 20 Timber Sale Licences. The first considerations will be demand, economics and logistics (in that order). Is there a secondary facility experiencing a fibre supply deficit and which is located within a financially viable transportation distance of a cut block? Are surplus trucks, trailer configurations, and drivers available in the area? Are the road conditions suitable for the types of trucks/trailers contemplated? Also, the PHWA process is redundant if the cutting authority does not require scaling (cruise-based cutting authorities).

Q: What administrative workload is expected?

A: Applicants will batch cutting authorities and cut blocks in an annual or perhaps semi-annual request by using a form provided by the Ministry. Waste submission and review may be much easier because the volume of forest residuals will be reduced. Districts will provide written authorization and may amend the list of cutting authorities and cut blocks from time to time. Timber Pricing Branch will create and update process documentation including the historical waste tables in the *Provincial Logging Residue and Waste Measurement Procedures Manual*.

Q: Are there any risks?

A: Yes. The legal premise for SFP designation is that it will not be used for solid wood products. If any SFP were to be used in a facility other than what was approved by the District Manager, this non-compliance would be grounds for immediate cancellation of the SFP approval. This risk is greater where primary and secondary facilities share a scale site, and the risk is even more pronounced when the facilities themselves are located on the same site (for example, where a whole log chipper operates on the same site as a sawmill). District staff will monitor and inspect operations, paying particular attention to operational procedures to maintain SFP segregation from other logs.

Q: Is more detailed information on the process available?

A: Yes, it is documented in the *Provincial Logging Residue and Waste Measurement Procedures Manual*.