PLATFORM

SITUATION

Forestry in British Columbia (BC) has adversely affected our province's ecology more than all other resource sectors combined. The forestry industry's elevated harvest and practice of replanting dense conifer stands has contributed to the loss of native flora and fauna, decreased the forest's natural ability to resist wildfires, increased flooding, and led to the decline of wildlife populations. With the primary focus of agricultural forestry on growth and yield rather than ecological integrity, major losses to biodiversity have occurred. Our forests need to be healthier for all British Columbians, and the Province has a critical role to play by changing legislation before it is too late for many species to survive.

More than 2,000 endangered wildlife species inhabit BC's forests according to government and peer-reviewed statistics and yet, various governments keep delaying the inevitable in the name of jobs. Although resourced-based jobs are critical to the province of British Columbia, these jobs must be sustainable, without producing wholesale damage to the ecology and wildlife where they harvest. This practise has gone on for generations, and we are now past dialogue and face much-needed action. We need to shift away from a model focused on maximizing profit, towards prioritizing ecosystem health, the long-term sustainability of biodiversity, and the multiple ecosystem and cultural goods and services that our forests provide. Leadership from elected officials on this issue is critical. This issue is one of the subjects foremost on the mind of a growing number of British Columbians as demonstrated by the actions at Fairy Creek.

ISSUES

Harvesting

An immediate need for landscape-level planning is long overdue, with appropriate consideration to how cutting permits are issued. Volume-based Forest Tenures are problematic: no single licensee is responsible, and therefore little-to-no stewardship is occurring. There are better ways to manage our forests that reward stewardship and increased biodiversity. Landscape-level planning needs to occur with more attention given to adequate habitat connectivity, maintenance of edge habitat, responsible cut block sizes, and viable road density.

Dr. Jeff Werner's paper, *The Abundance of Scarcity: Landscape Change, Protein Limitation, and Moose Population Dynamics in North-Central BC*[1] shows that moose in the study area are starving to death because of a lack of protein in their food supply. The reduced plant protein is thought to be caused by overexposure to sunlight stemming from large clear cuts. Logging block sizes should be minimized, they must also have wind-firm buffers. Logging roads and other linear features have improved the efficiency of predators, potentially

[1] The abundance of scarcity: landscape change, protein limitation, and moose population dynamics in north-central BC. Dr. Jeff Werner, BC Ministry of Forests, Lands, Natural Resource Operations, and Rural Development - October 18 2019

intensifying an imbalance between predator and prey. Road access must be calculated on a spatial area and kept to a density such as 0.6 km/km^2.[2] As new roads are created; old roads must be deactivated.

The Province has stalled on the *Endangered Species Act* despite more than 2,000 species now considered "at-risk" in British Columbia's forests. Now is the time to act to avoid additional damage and the permanent destruction of our delicate ecosystem for generations to come.

Increased logging and increased cut block size are significant factors in wildfires and flooding. *Equivalent clearcut area* (ECA) describes a second-growth block in terms of its hydrological equivalent as a clearcut. This determination of the hydrological effects of logging needs a higher priority. ECA thresholds have exceeded 50% and greater, leading to rapid snowmelt and downstream flooding. The lack of forest cover has also led to increased temperatures on the land while decreasing the land's inability to retain moisture.

It is long past time for the forest industry to shift to a triple bottom line model of profit, people, and the planet. A sole focus on profit to the exclusion of people and the planet is not adequate, nor acceptable. To better understand the adverse impact of logging in BC, please visit https://earthengine.google.com/timelapse/

For decades First Nations, scientists and conservation groups have been calling for a paradigm shift in how we manage our province's forests. That call has been getting louder, and a growing number of British Columbians are uniting to give voice to the need to protect BC's delicate ecosystems, endangered wildlife, and prevent additional habitat loss. We are running out of time.

Silviculture

British Columbia adopted the lodgepole pine as the conifer species of choice in the 1970s because of its ability to reach harvest maturity in roughly 60 years in the interior of the province (rather than the typical 120 years for other species). The continued widespread reliance on monocultures has proven to be detrimental to the future of our forest industry and BC's biodiversity.

Deciduous trees need to be included in silviculture plans; a variety of species is better for the ecosystem, provides more beetle- and fire-resistant forests, and is resistant to diseases as well. More consideration needs to be given to natural regeneration and a focus given to replanting the same species that are harvested. Planting the maximum stems per hectare of pine does not create a healthy forest.

LEGISLATION

Free Growing Legislation

Free Growing (aka Free-to-Grow) refers to a healthy stand of a commercially valuable species, the growth of which is not impeded by competition from plants, shrubs, or other trees. A licence holder who reaches free growing is released from any further obligation/liability for that stand. This legislation has created an

[2] This will vary with the physiography of an area. For example, a road density of 0.6 km/km2 will be a condensed cluster of roads in valley bottoms.

incentive for fast-growing trees (lodgepole pine), increased density (stems per hectare), and permitted the use of fertilizers and herbicides (glyphosate) – all of which are potentially harmful to biodiversity and wildlife. This practice is simply a narrow-minded, low-cost solution for an industry intent on maximizing profit. Accordingly, short-term profits are usually favoured over the uncertain profits of the future.

The practise of spraying glyphosate is a perfect example of a flawed policy, as it kills the grasses, leaves, berries, and seeds of plants that First Nations harvest for medicinal and edible purposes, and that many mammals depend upon for their survival. Glyphosate also kills bees that pollinate and other critical insects and poses serious risks to wildlife, waterways, and human health in these sprayed areas.

Forest and Range Practice Act (FRPA)

FRPA was introduced in 2004 to replace the Forest Practices Code. FRPA values include biodiversity, cultural heritage, fish/riparian, forage and associated plant communities, recreation, resource features, soils, timber, visual quality, water, and wildlife. Unfortunately, the forest industry pays little-to-no attention to most of these values, focusing instead on maximizing timber supply.

BC's Identified Wildlife Management Strategy[3] defined conservation areas intended to protect critical habitat for species affected by forest and range practices. Conservation areas that include wildlife habitat areas (WHAs), ungulate winter ranges (UWRs) and old-growth management areas (OGMAs) are limited by policy to one percent of the mature and total timber harvesting land base (THLB) area.[4] One percent is simply not enough of critical habitat protected.

Accompanying FRPA were the Forest Planning and Practices Regulations defining the government's objectives, which were required to be included in all Forest Stewardship Plans (FSPs). Although good in theory, in reality, FSPs are woefully inadequate and are missing planning and communication components.

The following sections are from the Forest Planning and Practices Regulations and list of objectives set by the government:[5]

> 5. The objectives set by the government for soils are, *without unduly reducing the supply of timber* from British Columbia's forests, to conserve the productivity and the hydrologic function of soils.
>
> 7. (1) The objectives set by the government for wildlife is, *without unduly reducing the supply of timber* from British Columbia's forest, to conserve sufficient wildlife habitat in terms of the amount of area, distribution of areas and attributes of those areas, for
>
> (a) the survival of species at risk,

[3] https://www.env.gov.bc.ca/wld/frpa/iwms/iwms.html

[4] https://www.env.gov.bc.ca/wld/documents/identified/IWMS%20Procedures.pdf

[5] https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/14_2004

(b) the survival of regionally important wildlife, and

(c) the winter survival of specified ungulate species.

8. The objectives set by the government for water, fish, wildlife and biodiversity within riparian areas is, *without unduly reducing the supply of timber* from British Columbia's forests, to conserve, at the landscape level, the water quality, fish habitat, wildlife habitat and biodiversity associated with those riparian areas.

9. The objectives set by the government for wildlife and biodiversity at the landscape level is, *without unduly reducing the supply of timber* from British Columbia's forests and to the extent practicable, to design areas on which timber harvesting is to be carried out that resemble, both spatially and temporally, the patterns of natural disturbance that occur within the landscape.

9.1 The objectives set by the government for wildlife and biodiversity at the stand level is, *without unduly reducing the supply of timber* from British Columbia's forests to retain wildlife trees.

Clear in this language is which priority is first – "***without unduly reducing the supply of timber…"*** This fundamentally undermines the ability to manage forests sustainably. This priority must change.

Professional Reliance

The forest industry has a poor track record of acknowledging their damaging practices, and self-regulating for improvements that benefit British Columbians. The Professional Reliance Model is broken – we cannot depend upon the forest industry to be stewards of our forests.

Although the public had great hopes for change, the Professional Reliance review conducted in 2018 has done nothing to change how the forest industry operates. As noted in Mark Haddock's *Professional Reliance Review: The Final Report of the Review of Professional Reliance in Natural Resource Decision-Making*,

> In 2001 and 2002 the provincial government conducted a core services review, which involved a major effort to *reduce regulations in the natural resource sector, reduce the size of government, and shift towards results-based regulation* [emphasis added]. As part of this effort, and in some cases integral to it, a system of professional reliance was also introduced. (6)

This statement illustrates that the model of professional reliance was created to empower the forest industry to do whatever it wants with no checks or balances. Indeed, that has been the outcome.

Recommendation 31 from Haddock's review:

> *There is strong public support for an arm's length review body that can review professional performance, investigate public complaints, audit practices on the ground, and contribute to the continuous improvement of regulations (similar to the Forest Practices Board, which borrows from the Ombudsperson Act and Auditor General Act). The Forest Practices Board fulfills this function for forest and range practices but does not have a mandate under any other natural resource or environmental protection statute. An independent review body such as a Natural Resource Practices Board or a Commissioner for Environment and Sustainability (formerly under the Auditor General Act but repealed in 2001) could be a cost-efficient means to augment the capacity for independent audits of performance and make recommendations to industry professionals and government agencies not only with respect to legal compliance but also with respect to the actual effectiveness of the practices and agency oversight in meeting objectives set by the government (see Dr. Bruce Fraser submission, Reforming the Professional Reliance Model, December 14, 2017). (Haddock, 75)*

Chief Forester

Under the *Forest Act*, the Chief Forester determines the Annual Allowable Cut (AAC) or the volume of timber approved to be logged annually. AACs are set for timber supply areas, tree farms and woodlots, and are determined by numerous factors including the rate of growth of the forest, different licences and agreements, the use of the area for non-timber related activities, and the "economic and social objectives of the government…for the general region of British Columbia."[6]

Criticisms of the models and data for determining the AAC, and the absence of independent auditors to verify the data, have emerged.[7] There is no legal requirement for the Chief Forester to conduct an inventory of provincial forests, which also has been criticized.

Requiring the Chief Forester to report to the Ministry of Forests, Lands, Natural Resource Operations and Rural Development creates a conflict of interest. The Chief Forester needs to be a truly independent statutory decision-maker, with a primary function of forest stewardship, ensuring that BC's forests are healthy and resilient. A diverse and science-based group is required to advise the Chief Forester and other key forest management roles.

The Chief Forester's decision-making authority needs to be transparent, accountable, and consistent, and needs to represent the economic, social, cultural, carbon, and biological values of BC's forests. The Chief Forester should report to the legislature, instead of to the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, and be provided with true independence of the government executive. The Chief Forester should be provided with the power to audit forest practices and to report annually on provincial forests. Furthermore, BC needs a Chief Biologist, with legislative responsibilities, to work with the Chief Forester to set objectives and conduct longer-term forecasts for habitat supply.

---

[6] Province of British Columbia 1996 s. 8

[7] https://www.focusonvictoria.ca/mayjune2017/an-orwellian-path-to-fraud-in-bcs-forests-r10/

RECOMMENDATIONS

1. Eliminate the volume-based tenure system and replace it with a specific licensee in a specific area.

2. Amend legislation, including:
   (i) Free Growing legislation to reward increasing biodiversity and non-volume-based metrics (i.e., moose density).
   (ii) Create wildlife objectives for the forest companies.
   (iii) Create silviculture incentives to deactivate roads, plant deciduous trees, and plant alternate forage.
   (iv) Review stems per hectare and allow some natural regeneration.
   (v) Outlaw the use of glyphosate and other similar pesticides.

3. Strike "without unduly reducing timber supply" in all FRPA regulations.

4. Empower the other values within FPRA.

5. Establish an independent Natural Resource Practices Board (Recommendation 31 of Haddock's Professional Reliance Review).

6. Change the reporting of the Chief Forester so the position reports to the government and not to the Minister of Forests.

7. Establish a Chief Scientist (or Chief Biologist) as a counterpart to the Chief Forester to ensure multiple values are adequately incorporated into the timber supply analysis.

8. Immediately move to fully implement the recommendations of the Old Growth Strategic Review Panel's Report.

Scott Ellis | Kelly Ready | Kathy MacRae | Chris Genovali

Guide Outfitters Association of British Columbia

Stop Animal Brutality

CBVA Commercial Bear Viewing Association of BC

RAINCOAST CONSERVATION FOUNDATION