

## Modernizing Forest Policy in B.C. – Intentions Paper

Len Vanderstar's Review, June 1, 2021

My comments below are based on a review of the Intentions Paper released on June 1, 2021. Given that what was presented today by the province is an intentions document, by default it is not binding at this time, so my comments must take this into account. Without getting too deep into the subject matter and from my perspective, I have listed pros/semi-pros & cons associated with the provincial government's intentions with respect to modernizing forest policy.

### Pros/Semi-Pros:

- ❖ Reaffirms government's commitment to UNDRIP, however the Declaration on the Rights of Indigenous Peoples Act already applies to B.C. laws, but implementation delay remains problematic with respect to an action plan and progress report.
- ❖ Increasing opportunity for new entrants in the forest sector, thus possibly supporting diversity and small business.
- ❖ Forest tenure re-distribution and revising tenure disposition considerations, with the intent to increase indigenous replaceable forest tenure opportunity and local community forest tenure options.
- ❖ Re-affirmation of implementing the recommendations from the Old Growth Strategic Review Report (Gorley-Merkel), however one of the key recommendations of an immediate moratorium on @ risk old-growth has been misapplied based on manipulative false data.
- ❖ Improvement of FRPA – tactical planning approach to better consider forest values with up-front Indigenous involvement, and re-instituting Statutory Decision Maker authority to reject a cutting or road permit based on resource stewardship concerns... “could irreparably impair other forest values”.
- ❖ Beginning to recognize a need for transition from maximizing timber volume to optimizing product value.
- ❖ Advance a process to minimize the burning of slash piles and freeing up fibre for product manufacturing, although no mention was made of minimizing the creation of slash.
- ❖ Increasing penalties for poor practices and behaviour with the intent to increase the deterrent.
- ❖ Forest tenure holders to be held accountable to harvest profiles expressed in the AAC to avoid the continuous of preferential stand harvest.

- ❖ Re-integration of prescribed fire into forest management with a focus on wildfire mitigation and habitat creation.
- ❖ Some very vague language that I am interpreting, but requires clarification, to actually base the AAC on growth & yield plots rather than hypothetical model growth projections...  
“consider limits on timber harvest until provincial silviculture investments have optimal harvest opportunity in consideration of risk and other values.”

**Cons:**

- ❖ Unabated logging of valued old-growth forests remains an ongoing concern; legitimate concern still exists with the talk and log scenario.
- ❖ Seemingly lack of recognition of the biodiversity crisis recognition in our forests; no forest structure & function management direction, although the commitment to implementing the Old Growth Strategic Review recommendations is mentioned, and one of the recommendations speaks to prioritizing ecosystem health and resiliency.
- ❖ No recognition that AACs must be reduced to prevent further loss/extirpation of forest dependent species.
- ❖ No mention of science-based factual data or core foundation advice to drive informed decision making. This is a major concern for the Science Alliance for Forestry Transformation. Where are the independent scientists?
- ❖ Compensation for lost harvesting rights may not translate to actual loss of volume of logs being transported to mills currently holding forest tenures, so public fund compensation should be carefully administered.
- ❖ Lack of commitment to reduce whole log export, just ability to audit fee-in-lieu of manufacturing (this was not being done before?). Four to five million m<sup>3</sup>/yr. of whole log export greatly reduces domestic employment and associated personal income tax to government.
- ❖ Re-distribution of tenure without acknowledging the first step to ensure adequate forest protection/conservation may result in an ineffective roll-out.