

BC COALITION FOR FORESTRY REFORM

Submission to the BC Government's Review of Professional Reliance in Resource Industries

January 18, 2018

BCCFR.ORG

This submission has been approved by the BCCFR membership.

BACKGROUND

The BC Coalition for Forestry Reform is a grassroots alliance of community-based associations advocating for culturally and ecologically sustainable forestry practices. Our membership has been expanding rapidly, so the most up-to-date list of our member organizations and their respective websites is available on our members page located at: <https://bccfr.org/ccffrr-member-websites/>

At time of writing the BCCFR's membership includes:

- Apex Property Owners Association
- BRVCA Valley Wide Forestry Committee
- Glade Watershed Protection Society
- Juan de Fuca Forest Watch
- Peachland Watershed Protection Alliance
- Shuswap Environmental Action Society
- Swansea Point Community Association
- The Upper Clearwater Referral Group
- Yalakom Forestry Committee

The members of BCCFR support data-driven, long term stewardship of the timber and non-timber values of BC's forests. We advocate for forest management based on long-term landscape-level planning, a mandatory shared decision-making process with local communities, careful incorporation of public needs and values, and full recognition of our forests' non-timber values including water, wildlife, tourism, and recreation.

We recognize that natural pests and harvesting have drastically reduced the timber supply in BC. Consequently, timber harvesting is now more frequently occurring deep in community watersheds, more extensively in critical recreation and tourism areas, and much nearer to BC's communities. This has negatively impacted a wide range of BC's non-timber values, including wildlife, water quality, tourism, and recreation.

The BCCFR welcomes the Professional Reliance review and commends the provincial government for launching this long-overdue analysis and correction to BC's natural resource planning and governance. Without exception, our membership believes the current system is fundamentally flawed in numerous ways.

PROFESSIONAL RELIANCE: WE JUDGE IT BY ITS RESULTS

While each member of BCCFR has had their own unique experience in working within the current Professional Reliance (PR) structure¹, there are numerous shared experiences and concerns that have emerged:

1. Our experience with PR has lead us each to conclude that there is an obvious conflict of interest, both in regulation and in practice, when industry employees who are extracting timber value for their employer are also the final decision makers in how non-timber values will be "protected" from the very harvest activities they are proposing.
2. Non-timber values are treated in both regulation and in practice as secondary to timber values even in areas clearly designated as watersheds or recreation areas.

¹ Many members of BCCFR have undertaken their own submission to the PR review.

3. In the event that the broad, and far too general regulations to protect non-timber values are not met, concerned citizens could indeed appeal to the government agency Compliance and Enforcement Program, but only after the damage was already done. Further, the experience soon confirmed that C&E has very little power.
4. Similarly, communities that turned to the Forest Practices Board found it too has little power to do anything meaningful in protecting non-timber values.
5. Local stakeholders feel powerless and ignored within a regulatory framework which requires no mandatory consultation with local communities and businesses. In other words, those most impacted by the forest industry's activities are explicitly and systemically disempowered to impact those activities.
6. Part-time local volunteers are spending inordinate amounts of personal time advocating for the non-timber values most important to their community simply because nobody else is.
7. Concerns expressed to MFLNRO are typically met with outright or de facto deferral to representatives of the local harvest license holders, meaning, the same forestry professionals being paid to maximize timber value. This has resulted in a sense that MFLNRO is grossly ineffective at best, fully co-opted by industry at worst. To put it bluntly, respect for MFLNRO's ability to be of any use to local communities is remarkably low amongst our members.
8. In some cases First Nation harvest license holders have introduced a new social dynamic during the discussions between license holders and community members and organizations advocating for non-timber values. This important social issue has been left unaddressed by government.
9. Because they simply do not exist, not a single member of BCCFR has been given a long-term forest management plan for their specific local area. Short-term harvest plans of 1-2 years (at best) are the norm.
10. In general, when multiple license holders are harvesting aggressively in the same area (for example a community's watershed) concerned community members must approach each license holder individually and then manually consolidate different and incompatible maps. That no unified harvest plan is available (or considered as necessary for good forest management) simply confirms local stakeholder's belief that this is basically a race for the best timber, and ultimately the last tree standing.
11. Lack of any attempt by industry and MLFNRO to integrate wildfire risk mitigation into harvest planning is another universal in our member's experience, and another testament to a badly broken resource management system.

RECOMMENDATIONS

Many of the members of BCCFR live in and represent communities in which forestry is an important contributor to the local economy. In this regard, BCCFR is most definitely not anti-forestry. However, times have changed and the forestry industry cannot continue to dominate the provincial landscape. We believe forestry and resource extraction governance in general must take into account the following:

1. Forest development must be managed according to publicly available, long-term, landscape-level planning, to include a mandatory shared decision-making process with local communities.

2. Full recognition of the timber and non-timber values of our forests including water, wildlife habitat, biodiversity, tourism, and recreation.
3. The restoration of clear government discretionary powers with regard to approval of logging plans and practices, including an improved Forest Practices Code and accompanying guidelines.
4. Full recognition and guidance of forestry planning on the basis of scientific data. Full recognition, for example, of global warming and adjustment of forest policies accordingly.
5. A vigilant monitoring system, well budgeted and independent of industry control, with particular attention given to riparian zones and roads.
6. Staffing levels and budgets adequate to support the proposed changes.