

Professional Reliance Review Comments

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I appreciate the opportunity to provide comments on the BC Government review of Professional Reliance.

I have worked in the Forest Sector for over 30 years and my comments are focused on that area. During this time, government has completed comprehensive land use planning exercises and developed extensive legislation and regulations. The province's Chief Forester regularly conducts Timber Supply reviews that evaluate current practices to determine the amount of timber that will be harvested and who will have access to it. Reforestation of harvested areas is excellent, as proven by ongoing professional survey submissions. Despite this level of oversight and results, the issue remains that people do not like the view of a logged area or the access that a new road provides for all British Columbians. I do not think a review of professional reliance will change these individual stakeholder views.

For me, the professional reliance issue is not if qualified professionals receive adequate oversight from their respective associations and government, and/or if they have appropriate involvement in decision making or if the public interest is protected. The issue has been, and continues to be, individuals and stakeholders want the ability to override resource management decisions based on their personal views. It is not based on the actual practices of qualified professionals or on science. Rather, it is a view held by these individuals that their value judgements are more relevant and accurate, more important and therefore correct.

Submissions have called for increased government oversight as a means to address resource management practices. The largest holder of timber harvesting rights in British Columbia is BC Timber Sales. This is a government agency that employs Forest Professionals and other qualified professionals to develop timber sales for auction. My observation is that BC Timber Sales cutting permits, roads and results do not look significantly different than those completed by other forest professionals. This is logical as government provides comprehensive laws and regulations which all qualified professionals must follow in their resource management submissions and practices. Direct government planning of the entire resource management process does not provide different results.

Level of Professional Reliance in Resource Management Decisions

Essentially, government contracts license holders to develop cutblocks and roads and regenerate harvested sites according to legislation and regulations that government provides. Professional Reliance decisions are limited to implementing the government's legislative construct on the ground. The government has, and continues to enact Government Action Regulations covering individual wildlife species, watersheds and streams. These added

regulations, developed by government qualified professionals, are often highly prescriptive, precautionary in approach and leave very little, if any room for individual professional deviation. Professional Reliance in resource management decisions is very limited for non-government forest professionals.

Focusing efforts on reducing Professional Reliance will not address the ongoing issue of how and where we in BC utilize our natural resources. Multiple tenure holders including Guide Outfitters, Ranchers, and Trappers advocate for their tenure rights to receive the highest priority. This creates conflicts as each tenure holder advocates for their resource and often, attacks the other tenure holders use and practices. Reducing our use of professional reliance may, in fact, make resource use even more difficult as individual decisions become much more political in nature.

The catastrophic 2017 fire season highlighted the need for a forest management regime that also appropriately recognizes the economic and human impact of forest fires and insect infestation epidemics. Reducing or removing economic access to our forests and increasing regulation does not address the fact that our forests require periodic renewal and many of our forested ecosystems require clearing to renew themselves.

Recommendation

We must continue to evolve professional reliance, but as we do so, I suggest that government commit to undertaking a campaign to educate the public and other stakeholders about resource management and the need to maintain a working forest in the province. It is extremely difficult for any qualified professional to resolve competing land use views and objectives held by various individuals and stakeholders. Without this complimentary effort, any movement forward on the professional reliance front will be in vain.