



The BC Cattlemen's Association (BCCA), and the over 1200 ranchers (amounting to 1500 Range Act tenure holders and 400 Grazing Lease holders) that our association represents, applauds the government of British Columbia for undertaking review of the Forest and Range Practices Act (FRPA). We appreciate that FRPA is an important tool for the sustainable management of crown timber and range resources that, by extension, directly affects many other values that are crucially important to British Columbians.

The existing FRPA system has significant shortcomings, not least of which is the fact that the current framework does not allow for practical processes and mechanisms to uphold and manage for the breadth of values associated with a sustainable and resilient resource landscape.

Of principal concern to BCCA is the fact that forage is currently not given enough profile in the planning, decision making and management related to FRPA and the crown landscape and this has **undermined the sustainable management of forage**.<sup>[1]</sup> While regional differences occur, in general, this has translated into a landscape marked by more trees, less forage, less desirable types of forage and more invasive plants. This has meant localized forage shortages for tenure holders, less food for wildlife and impacts to basic soil building functions. Dense plantations and the ensuing effects of insect kill and fire has also created a landscape that can be much more difficult to access and navigate with livestock, exacerbating the effect of the overall forage shortfall on livestock producers.

In very tangible terms, failing to manage for sustainable forage undermines the viability of the cattle industry in BC; an industry that time over has proved to be a significant, reliable and durable contributor to the BC economy and, in particular, a lasting cornerstone of rural communities and rural economies. While other industries are more cyclical, agriculture is a permanent fixture on the rural landscape in BC: a backbone of local communities.

Sustainable forage supply is not just critical to ranchers. Given the many values associated with healthy rangelands and abundant, sustainable forage – like cultural values, habitat for wildlife and species at risk, contributions to the water cycle, climate change mitigation and adaptation, wildfire resilience, soil microbiology and soil moisture retention capacity, and opportunities for economic diversity and to support rural communities in BC – when we erode our forage supply, we erode an abundance of values and opportunities.

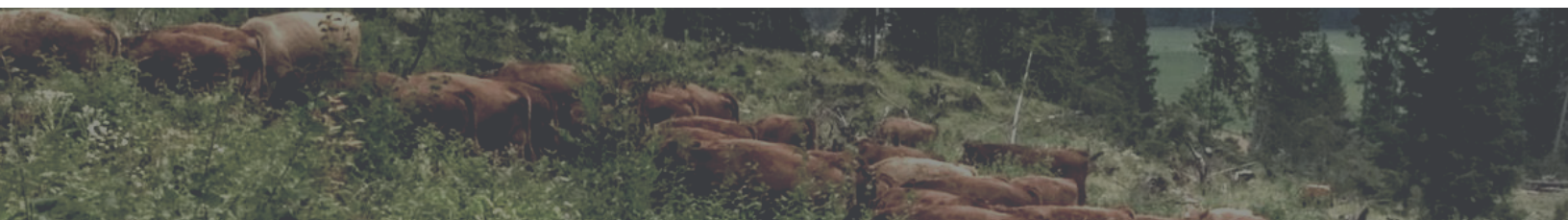
The BCCA agrees that many features of the current legislation, regulation and policy surrounding FRPA needs to be adjusted to align with the needs and values of today, including:

- encouraging public trust in the management of our resources;
- allowing for better landscape level planning; and
- allowing better oversight of activities to achieve goals of the Act and with other government initiatives and societal priorities.

We are pleased to see the emphasis that government is placing on managing for resilience. We encourage taking a view of resilience that encompasses ecological, economic and community resilience that focuses on long term durability and productivity.

We are grateful for the opportunity to provide comment in the context of this engagement process and submit the following overarching comments as a supplement to our responses to the specific engagement questions for your consideration.

*{1} Forage is a critical element of forest and range ecology, providing food for livestock and wildlife and supporting basic soil building processes. The BCCA supports a conception of rangeland that encompasses indigenous and domestic vegetation that either is grazed or that has the potential to be grazed, and is managed as a natural ecosystem. Rangeland includes grassland, grazable forestland, shrubland and pastureland.*





## FIVE OVERARCHING OUTCOMES:

Appreciating that changes to FRPAs legislative framework will encompass legislative, regulatory and policy changes, we offer the following **Five Overarching Outcomes** to compass ensuing work on these changes.

1. Elevating the profile of forage and the range sector within and throughout the FRPA management regime to achieve a sustainable forage supply. As noted in section 4 of the Ministry of Forest and Range Act, the province of BC has been charged with supporting and encouraging world class timber and ranching industries.[1] Unfortunately, in practice, ranching has not received the same profile as timber in the context of resource management and better symmetry is required to support the success of both sectors. In the context of the legislative review of FRPA, we encourage a thorough look at all places where inconsistencies in profile between these two sectors can be reconciled. This includes:

- o Elevating the profile of forage in the language and conceptually throughout the legislative, regulatory and policy framework.
- o Including a specific definition of forage in FRPA that eliminates ambiguity
- o Language matters: it informs the way we think about things, what is deemed important and, in turn, how action unfolds. We ask that care is taken when drafting the new legislation and in general communication to ensure that, where appropriate, there is symmetry in language. For instance, ensuring the inclusion of both 'forestry and range', or 'timber and forage values'.
- o Addressing a symmetry of roles within the Ministry. For instance, we have a Chief Forester, but no equivalent for range. This is not only a symbolic difference: it has significant functional implications that pervade the system of planning, management and decision-making.
- o Increased certainty of resources associated with range tenure. Unlike timber supply, forage supply is very vulnerable to the activities of other tenure holders. Given that range tenures are area based tenures, it is very difficult to manage when impacts occur on grazing tenures and options to recuperate forage resources elsewhere are not practicable.
- o Create a regulatory tie within the FRPA to the Ministry of Forests and Range Act to reinforce the commitment to Integrated Resource Use.

2. **An increased ability to plan and manage the forest landscape for multiple values, ecosystem diversity and resilience that gives strong voice to tenure holders, while being inclusive of other perspectives:** increasingly, more latitude is needed to plan and make decisions about crown resources that take into account multiple values (not just timber values) and changing circumstances. In particular, changes must:

- o Support sustainable forage supply
- o Manage crown resources for abundance, which includes deriving values from a diversity of resources of the landscape (not just timber) and maximizing shorter term returns from the landscape (forage values that support livestock, wildlife and healthy soils) with an increased focus on short term non-timber value streams to provide economic resilience to rural communities.
- o Enhance focus on soil health and the fundamental processes supporting soil health at both the surface and subsurface level. Existing legislation considers soil health in terms of allowable degradation at the cut block level. However, the basis of soil health originates at the microscopic and particle level. In agriculture we use this principle to build productivity within our soils often through improvement of soil organic matter via the unique root decomposition phases associated with grazed forages. This contrasts starkly to the approach of measuring allowable degradation. Soil health is the source of all productivity associated with the landscape and is critical to water infiltration and retention capacity, effective components of climate change adaptation. Furthermore, a greater emphasis should be placed on in-soil carbon storage, protected from release by fire, as a climate change mitigation strategy.
- o Enable informed planning to occur at multiple levels from a large landscape level, to a site specific level.
- o Enable a new approach to Resource Governance at the local and regional level that guides the determination of values, land use plans and decision making. *This must include tenure holders as central pillars*, and can provide an opportunity for other stakeholders and the public to provide comment.

3. **The establishment of a concrete mechanism for decision making around multiple values.** In order to support land use planning, effective relationships between licensees and decision making around multiple values, an effective mechanism is needed.

- o The BCCA supports enhancing District Manager (DM) decision making authority as that mechanism.
- o The DM would have an ability to intervene in cases of undue impact to other licensees as a backstop measure, but fundamentally these non-timber values must be protected by results based, measurable objectives or clear practise requirements.
- o DM authority should be a mechanism to support implementation of land use plans that are created based on input from tenure holders and other stakeholders on the landscape.





**4. That Crown ALR Lands are managed primarily for the purpose of agriculture.** Over 50% of the province's Agricultural Land Reserve (ALR) occurs on crown land but, to date, it has not always been managed for agriculture. Not only is this misaligned with the purpose of ALR lands, it is a missed opportunity to enhance food security and support economic opportunity and community resilience in British Columbia. The BCCA seeks widespread licensee, stakeholder and public recognition of the extent and purpose of the ALR. In order to do this, we urge the development and implementation of new policies, measures and strategies, consideration of the ALR in Forest Stewardship Plans, Operational and Site Plans and the elimination of barriers, to allow Crown ALR lands to be managed primarily for the purpose of agriculture and food production.

**5. That an Interim Strategy be developed and implemented to bridge the gap between the current regime and when the changes take full effect.** BCCA envisions a resource management framework wherein ensuring sustainable forage supply is a core element and where forage values are upheld in planning, law, regulation, guidance policy and, fundamentally, at a cultural level within government and society. To this effect, we submit our comments to influence the legislative and regulatory framework. However, we appreciate that it will take time to build new land use plans, governance systems, guidance policy and decision mechanisms. In the interim, understanding that not all new provisions will take effect immediately there needs to be strategies in place that allow movement towards our goals that balance goals with practical constraints.

We encourage government to be deliberate and calculated about the architecture of an interim strategy. As such we offer the following comments on ways that improvements can be made in the interim that drive toward our goal of a sustainable forage resource, but that offer pragmatic, resource efficient solutions that can dovetail with existing Forest Stewardship Plans while they remain in effect.

- a. Interim Practice Requirements: Create provisions for the development of practice requirements that can be applied to FSPs in the interim in order to ensure that grazing licensees can, at a minimum, meet their required AUMs. We encourage having this enabled in the legislation and would like to work with government on the development of a suite of practical requirements in the coming months. Examples of potential practices include:
  - o Interim guidance for forest practices on ALR lands
  - o Allowing latitude in silviculture prescriptions at the site level
  - o Regional guidelines for site prep
  - o Reducing wood-waste on blocks to support available forage
- b. Engagement: Prioritize bringing new tools for engagement into effect, including the forest operations map. Require that other licensees are consulted on site plans and require that actions are taken to address concerns of licensees.
- c. Interventions: Bring enhanced DM provisions into effect immediately to support:
  - o Site-specific decision making for forage in the context of existing FSPs
  - o An appeal process for licensees (further to point above regarding engagement)
- d. 'Pilot' Approaches: Finally and in general terms, we encourage using the interim phase as an opportunity to 'pilot' and 'field test' approaches and elements of the regulatory framework to support the effectiveness and feasibility before the new legislative framework comes into full effect.

We thank you once again for the opportunity to participate in this engagement process. The BCCA would like to be kept apprised of developments to this process and would like to be involved in any subsequent discussions of legislative, regulatory and policy changes. We would be pleased to discuss this matter with government further at any time.

[1] Purposes and functions of ministry (Sec 4 Ministry of Forest and Range Act)

4 The purposes and functions of the ministry are, under the direction of the minister, to do the following:

(a) encourage maximum productivity of the forest and range resources in British Columbia;

(b) manage, protect and conserve the forest and range resources of the government, having regard to the immediate and long term economic and social benefits they may confer on British Columbia;

(c) plan the use of the forest and range resources of the government, so that the production of timber and forage, the harvesting of timber, the grazing of livestock and the realization of fisheries, wildlife, water, outdoor recreation and other natural resource values are coordinated and integrated, in consultation and cooperation with other ministries and agencies of the government and with the private sector;

(d) encourage a vigorous, efficient and world competitive

(i) timber processing industry, and

(ii) ranching sector in British Columbia;

(e) Assert the financial interest of the government in its forest and range resources in a systematic and equitable manner.