

July 15, 2019

The Honourable Doug Donaldson
Minister of Forests, Range and Natural Resource Operations
and Rural Development
Via email: engagefrpa@gov.bc.ca

Re: Forest and Range Practices Act Improvement Initiative

Dear Minister Donaldson,

Please accept this document as Mosaic Forest Management's response to the call for formal input submissions on the Forest and Range Practices Act Improvement Initiative. We appreciate that full FRPA Improvement process is intended to span several years with engagement processes with industry at various stages, but we did want to take the opportunity to provide high-level comments related to this "Phase 2" legislation engagement.

Mosaic Forest Management is the land manager for TimberWest and Island Timberlands, and while most of the land we manage is governed under the Private Managed Forest Land Act, we do also manage replaceable forest licence volume in the Great Bear Rainforest and the North Island TSA, as well as Tree Farm Licence 47. As a large player in the BC Coastal industry, we recognize that policies must evolve over time, and submit these comments with the aim of supporting an economically viable, environmentally sound and socially responsible industry on BC's Coast through this policy transition.

Defining Public Trust

On Crown land, the public has a right to understand and have input on how their forests are managed. Our concern is that the concept of "public trust" can be misused by some to advance a view that any activity or practice they do not support is a violation of public trust. Specifically, we are concerned that, if not properly designed and communicated, individuals or groups could attempt to use consultation processes and input opportunities at the site level (comments on Forest Operations

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Maps, for example) to undo decisions made at the landscape level (Landscape Unit Plans or Landscape Level Plans) or unfairly frustrate operations authorizations. A process that does not expressly prevent this type of gridlock could lead to lengthy, intractable consultation processes that are difficult if not impossible to resolve, with serious negative implications for the sector and local economies.

Our request is that government clearly define that public trust means that:

1. The planning process will be clearly articulated, including:
 - what issues are in scope at which stage of the process,
 - the opportunities for input,
 - the decision-making process, and
 - what becomes out of scope / considered already addressed at a previous stage or a separate planning process.
2. What will happen on the land base in accordance with those plans will be transparent, and
3. Outcomes will be monitored and shared.

Public trust is then appropriately understood as transparency, the opportunity to have one's voice heard, and visibility that commitments made happen on the ground – as opposed to an unachievable concept of 100% consensus.

Maintaining Timber Flows as a Core Objective

The BC Government has committed to fostering a strong, resilient and profitable forest industry on the BC Coast. This is only possible by maintaining a robust supply of timber. Sustainable forest management is a three-legged stool, focused on environmental, social and economic sustainability and it is therefore critical that timber supply be maintained as a key overarching objective. Economic sustainability considerations must be given strong footing in land use planning, landscape level planning and subsequent site plans and permit processes, and the only means of achieving that is to make timber flows a key objective and not simply an outcome of the planning processes.

Great Bear Rainforest Order

Government, First Nations, Industry and ENGOs are still grappling with the complexity of full implementation of the Great Bear Rainforest Order (GBRO) on the ground. No area in the province – perhaps the world – has undergone such an extensive, collaborative planning process and we strongly recommend that government not overlap another, separate landscape level planning process on top of the GBRO Landscape Reserve Design process.

Clear Milestones, Timelines and Expectations for Industry

Industry needs to have a detailed understanding of the process, timelines and expectations in order to plan business activities, keep an appropriate flow of permits and timber supply to support local mills and businesses, and ensure that staff are aligned to meet requirements and forecast accordingly. Furthermore, industry needs certainty that planning will move along in a stepwise fashion and in a timely manner, that decisions made at the landscape level process and relied upon for forecasts and investments are not undone at subsequent stages or at the block level, and that the timber harvesting land base will not be significantly alienated through overlapping constraints, processes or delays.

Direction to Statutory Decision Makers

Statutory Decision Makers, particularly District Managers, will be forced to review multiple comments from citizens, environmental groups, First Nations, industry and others – to decide which comments fall in scope, appropriately weigh that input and ultimately make a decision. These decision makers will need clear guidance – that is publicly available and transparent – to ensure consistency across the province and visibility into the decision-making process to foster trust across all parties and to support timely decision making.

Oversight and Accountability

As previously stated, part of public trust will hinge on monitoring and public reporting. Many of the elements for monitoring and public reporting are in place, but are either poorly funded, inadequately deployed or unknown to the public. The following avenues for oversight should be reviewed and either maintained and resourced, or disbanded – rather than adding additional programs without reviewing what is already in place or in progress.

- Office of the Superintendent of Professional Reliance
- Forest and Range Effectiveness Program
- Forest Practices Board
- Compliance and Enforcement (FLNRO, MoE)

Flexibility to Respond to Climate Change and Support Innovation

In order to effectively transform our management practices based on impacts of climate change, the regulatory framework needs to incorporate sufficient flexibility to allow this. Flexibility is also a precursor for innovation, and we would not want to see changes that would result in prescriptive regulations that hamstring innovation or limit practices that help respond to rapidly changing conditions on the land base. Also, there are currently many reserve areas that were set aside based on historical climate and forest conditions, such as Ungulate Winter Range. These areas should be reviewed as part of the landscape level planning process and their value reassessed and adjusted or relocated if needed.

Research and Education

Active forest management will be needed to build climate resilience – reducing wildfire risk, spatially flexible conservation areas, seed zone boundaries and more. There is a strong body of research to draw on, but as we move forward, more will be required, particularly related to monitoring. Government will need to allocate sufficient resources not only to support this research monitoring, but also to support information sharing and public education. As government looks to more actively engage with the public, ensuring the public is well informed on the

science behind forest management decisions will be essential to building trust and enabling informed public input.

Timely Authorizations

The changes being contemplated are extensive, and we believe that to maintain the health of the coastal forest sector and build strong and resilient communities, government needs to commit to keeping fibre moving throughout the change process. This is both challenging and incredibly important, and a key focus for Government must be on a smooth transition that manages expectations of all stakeholders, sets clear parameters that industry can rely on to make business and investment decisions, provides stable employment, and keeps cutting permits moving to support the sector through the transition.

Thank you for consideration of this input. We look forward to working with you and the staff at MFLNRORD to make sustainable changes to the Forest and Range Practices Act and supporting regulations.

Sincerely,



15 July 2019

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