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FRPA Phase II Changes – Sierra Club BC Submission – July 2019

Sierra Club BC welcomes the opportunity to comment on needed improvements to B.C.'s Forest and Range Practices Act (FRPA). In addition to the joint submission from Sierra Club BC and more than 20 other NGOs¹, we would like to offer additional context and suggestions, and to submit the report by the University of Victoria's Environmental Law Centre (ELC) 'Applying Solutions from the Great Bear Rainforest Agreements to Vancouver Island, the South Coast, and Beyond.'²

As a result of decades of unsustainable logging practices, now combined with severe climate impacts, B.C.'s forests are in a state of increasingly worrisome ecological health. These impacts undermine wildlife habitat, biodiversity, and cultural values for Indigenous and non-Indigenous peoples. They affect the outlook for forests through impacting crucial environmental services such as carbon storage and sequestration, and the ability to hold and provide clean water. This has led to the increasing risk of fire, flooding and landslides.

Currently, across the vast majority of the province, old-growth forests and intact forest landscapes undisturbed by industrial activity have been reduced dramatically. In high productivity forest ecosystems, like valley bottom rainforests with very big trees, remaining old-growth is less than ten per cent of its original extent, and an even smaller amounts are formally protected.

The negative outlook is exacerbated by steps taken by the previous government in the early 2000s, including introducing the model of professional reliance, that have weakened B.C.'s forestry regulation and government capacity for forest stewardship. This has greatly hindered the ability of the B.C. government to make sound decisions based on coherent information about the state of the forest and to ensure monitoring and enforcement.

The scope and scale of this crisis requires government leadership for real change and a paradigm shift in how we manage B.C.'s forests in order to strengthen and restore government capacity to sustainably manage forests on public and private lands in a manner that fully respects Indigenous rights and jurisdiction. All amendments to FRPA must be in alignment with implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and fully respect Indigenous jurisdiction and consent.

¹ <https://sierraclub.bc.ca/wp-content/uploads/FRPA-Joint-ENGO-Submission.pdf>

² <https://sierraclub.bc.ca/wp-content/uploads/ELC-Applying-solutions-from-GBR-2019.pdf>



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Recommendations in the context of the climate crisis

Amendments to FRPA are being discussed at the same time that a forest and climate emergency is unfolding in B.C. Changes must be guided by the urgency needed to protect and restore resilient forests for the important role they play in both helping slow climate change and helping defend the safety of communities.

As the climate shifts into uncharted territory, only intact forests can buffer the impacts—not clearcuts and young tree plantations. Intact forests are essential for clean air and water, species habitat, long-term forestry jobs and protecting communities from floods and disasters.

Clearcutting carbon-storing forests is fueling the climate crisis. B.C.'s forests used to be net carbon sinks. Excluding wildfires, industrial logging of forests is the largest single source of greenhouse gas emissions in B.C.³

The climate emergency means we need to protect the intact natural forests that remain resilient, particularly carbon rich old-growth. In some forest landscapes, cautious intervention like thinning to build resiliency and controlled burns will be necessary. Clearcutting and logging forests on short cycles exacerbates global heating, and is never the right answer.

We can slow climate impacts by protecting intact natural forests, particularly large landscapes, to moderate local climate change. Right now, B.C. communities are at increasing risk of climate impacts worsened by large-scale clearcutting and destructive practices like slash burning that add to carbon emissions. All of which are also causing cumulative damage in many Indigenous territories. We have to store carbon, not release it, and natural intact forests do that best.

Moving away from destructive forestry practices must be part of provincial climate action to reduce carbon pollution. Careful planning and logging, leaving more large trees standing, means more jobs and less ecosystem damage per cubic metre of wood cut.

Proposed amendments

FRPA amendments must be part of a paradigm shift from a timber-based approach to a principled ecosystem-based approach to restore the carbon storage function and life support systems provided by forests. This will also give species and ecosystems a chance to adapt to the changing climate and reduce deadly dangers for communities.

The first step on this path must be to remove the constraint “without unduly reducing the supply of timber from British Columbia’s forests” from all FRPA legal objectives and other regulation.

Secondly, the constraint “without unduly impacting the resilience of ecosystems, environmental services, the ability of forests to function as a carbon sink and provide habitat for species” should be added to timber and other ‘use’ objectives.

³ <https://sierraclub.bc.ca/wp-content/uploads/SCBC-Forest-Emissions-Report-Jan-19.pdf>



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We recommend that existing and future logging plans undergo a “climate impact test” mandated by FRPA. Every hectare of newly clearcut forest leaves communities more vulnerable to flooding, wildfires and loss of clean water. Logging plans must be adjusted or cancelled to address these dangers and the public interest.

The amendments should establish binding protection of big old-growth trees with an appropriate buffer. With additional policies put in place to protect bear dens with an objective like in the Great Bear Rainforest order.

Also important is to include the base level forest protection recommended in the 2019 University of Victoria Environmental Law Centre (ELC) report ‘Applying Solutions from the Great Bear Rainforest Agreements to Vancouver Island, the South Coast, and Beyond,’ prepared for Sierra Club BC. This report summarizes the main principles applied in the Ecosystem-Based Management framework in the Great Bear Rainforest and recommends the minimum conservation level in this region as a starting point across B.C. Applying these principles would ensure a base level of protection and, where necessary, require the restoration of old-growth forests.

The key recommendation of the report is to set aside thirty per cent of old-growth by ecosystem and landscape unit in areas that are ecologically similar to the Great Bear Rainforest (such as Vancouver Island, the South Coast and inland temperate rainforests). In those parts of the province where trees typically don’t grow as old as in temperate rainforests, the thirty per cent target should be applied to those forests that are least damaged from industrial logging and have the highest value for biodiversity.

The Great Bear Rainforest is the only major region in B.C. that has science-based conservation thresholds for old-growth forests. The Ecosystem-Based Management framework aims to ensure seventy per cent of the natural amount of old-growth of every type of forest is set aside from logging across the region (a low risk threshold for ecological integrity). Additionally, the framework calls for a minimum of thirty per cent of the forest set aside at the landscape level for every ecosystem (the high risk threshold for ecological integrity) to maintain connectivity.

The amendment process for B.C.’s forestry law gives the B.C. government a generational opportunity to apply a key element of the Great Bear Rainforest solution across the province.

In addition to applying a baseline of conservation across the province, remaining intact old-growth areas require logging moratoria to allow time to assess options, for example for new Indigenous protected areas. Further conservation must be determined as part of the process of modernizing regional land use plans with Indigenous Nations on a government-to-government basis.

Thank you for the opportunity to provide feedback on the Forest and Range Practices Act. This is a major opportunity to vastly improve BC’s forestry laws to protect these vital ecosystems for our climate and for communities across the province.

Sincerely,



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