



July 9, 2019

Recommended Changes to the Forest and Range Practices Act

- **Because we live in a democracy:**
 - Strengthen the requirement that forest management serves the public interest.
 - Define the public interest to include the maximization of forest carbon storage, the restoration of habitats and biodiversity, the protection of community water sources, meeting community recreational needs, and planning for multiple forest values across the landscape.
 - Develop a planning process includes Indigenous peoples, stakeholders and the public.

- **Because of the need to tackle the climate emergency** and to protect communities from flooding and wildfires, ensure that a company's forest management plans:
 - Include a legislated climate impact test to protect the carbon in the soil and to maintain forest carbon stocks.
 - Aim to maximize a forest's natural carbon carrying capacity.
 - Do not increase temperatures on the ground.
 - Do not include logging in forests that are unlikely to grow back due to moisture stress.
 - Plan for climate-resilient species that can survive the next 200 years.

- **Because of the need to protect long term jobs and the forest ecosystems** on which jobs depend:
 - Establish a legal hierarchy of objectives that prioritizes maintaining and restoring forest ecosystems.
 - Require tactical forest planning as well as strategic planning and operational planning, as recommended by the Forest Practices Board.¹
 - Remove the constraint "without unduly reducing the supply of timber from British Columbia's forests" from all legal objectives and the Government Actions Regulation. Add the constraint "without unduly reducing the resilience of ecosystems" to timber-use and other objectives.
 - Restore linkage to the province's mills ('appurtenance').

And ensure that a company's forest management plans:

- Maximize forest and timber quality over the 300-year lifespan of a forest.
 - Use 'close to nature' silvicultural systems of harvesting that maintain riparian shade and promote disturbance-resilient landscapes.
 - Manage forests for the long-term persistence of species, systems, communities, age-classes and relationships.
- **Because of the need to protect public drinking water:**
 - Prohibit clearcutting in community drinking water watersheds.
 - Ensure that a company's forest management plans protect the quantity and quality of water flowing off the land.
 - Establish Community Watershed Reserves in areas where logging could impact the quality and quantity of a community's drinking water.
 - Ensure that the Act requires landscape-level planning, bounded by the watershed peaks.
 - Ensure that the Act reflects the province's Water Sustainability Act.
 - **Because of the need to address the global ecological crisis** and Canada's commitments to biodiversity protection:
 - Establish biodiversity as a high management priority in all forest ecosystems through an explicit objective in the Act.
 - Protect all forested lands within 60 metres of a riparian zone, measured horizontally, rather than 15 metres, which can be measured vertically.
 - Prohibit logging in all high risk ecosystems (defined as those in which old growth retention targets are not being met), critical habitat for species at risk, and habitats needed to meet provincial wildlife objectives.
 - In regions of higher natural disturbance and less old-growth, set aside 30% of the forest for the purpose of long-term ecological integrity, consistent with the recent call from an international of biologists recommending the goal of 30% of the Earth's land to be protected by 2030.²

And ensure that a company's forest management plans:

- Protect the forest ecosystem as a whole.
 - Maintain and/or restore connectivity across landscapes, altitudes and refugia at a landscape level .
- **Because of the need for healthy communities:**
 - Ensure that a company's forest management plans leave room for a community's recreational needs.
 - **Because of the need to protect the province's remaining old-growth forest:**
 - Establish legislated minimum targets for old growth and mature forest retention, where necessary using recruitment by ecosystem and productivity class.

- **Because of the need to draw on the province’s best wisdom and advice**, establish a Forests Science Council including experts in western science and indigenous traditions:
 - To evaluate the condition of forest ecosystems.
 - To recommend old growth and biodiversity targets.
 - To recommend forest management methods.
 - To evaluate the effectiveness of the Act’s legal objectives.

- **Because of the need to re-establish public trust in the forest companies:**
 - Restore the role of Ministry of Forests staff to approve a company’s forest management plans.
 - Require forest companies to provide sufficient information for decision-makers to evaluate operational plans and proposed operations for consistency with legal objectives, surveys, assessments and studies relied on by licensees.
 - Require input into proposed forest management plans from Regional Districts, adjacent landholders, and community stakeholders within impacted watersheds.
 - Before approving forest management plans and before any permits are issued, require the Ministry’s decision-makers to determine whether the proposed forest operations are consistent with maintaining and/or restoring healthy, fully functioning forest ecosystems that support ecological, social and cultural resiliency and the United Nations Declaration on the Rights of Indigenous Peoples.
 - Require Ministry decision-makers to provide a public rationale for their decisions that addresses public concerns, with supporting data.

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¹ <https://www.bcfpb.ca/wp-content/uploads/2019/07/SR58-Tactical-Forest-Planning.pdf>

² <https://www.nationalgeographic.com/environment/2019/04/science-study-outlines-30-percent-conservation-2030/>