



Procedural Guidance for Transitioning from Forest Stewardship Plans to Forest Operation Plans

The contents of this bulletin are for information purposes only, and this bulletin does not constitute legal advice. All users should refer to the relevant sections of current legislation referred to in this bulletin for the exact legal wording of any requirements. Government practitioners should seek legal advice from the Ministry of Attorney General, whereas industry practitioners should seek independent legal advice.

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1.0 Introduction

This bulletin provides guidance on the legislated requirements and processes during the transition from forest stewardship plans (FSPs) to forest operations plans (FOPs), following the establishment of a forest landscape plan (FLP). It provides direction on prerequisites, timelines, and best practices for operational planning during this period of change. The bulletin is intended for forest professionals, government staff and statutory decision-makers (SDMs) involved in the preparation or review of FOPs.

Amendments to the *Forest and Range Practices Act* (FRPA) and Forest Planning and Practices Regulation (FPPR) introduced FLPs as the new planning framework for forest management in B.C. The FLP and its components account for FRPA values and address forest management challenges at the landscape-level. This framework is intended to replace the FSP and associated forest operations map (FOM) regime over time (see inset box).

FLPs are prepared by the Province in consultation and cooperation with First Nations, in collaboration with agreement holders under the *Forest Act* and local communities, and with input from local stakeholders. Once established, the FLP sets clear direction for forest development within the forest landscape area (FLA).

As the FLP framework replaces the FSP regime and associated FOM, legislation provides for the necessary transition provisions. This bulletin will discuss the legislative and regulatory aspects of each section:

- FRPA s.2.48 [*Exemption from requirement to hold forest operations plan – activities under forest stewardship plans in new Forest Landscape Areas*]; and
- FRPA s.2.49 [*Exemption from requirement to hold forest operations plan — activities under cutting permits or road permits issued in relation to forest stewardship plans*]

For guidance on content requirements and preparation of a FOP, please refer to *FRPA Administration Bulletin 17: FOP Content and Mapping Requirements*.

Forest Operations Maps & FSPs

Under the FSP framework, FSP holders are required to have a forest operations map (FOM) before applying for a cutting or road permit (CP/RP). The FOM must show proposed cutblocks and roads anticipated to be harvested or constructed during the FOM's term.

Introduced in 2024, this requirement aims to enhance public transparency of forest operations. Since transparency and public engagement are key components of the new FLP regime, these requirements associated with the new FOP will closely resemble those established for the FOM (see *FRPA Administration Bulletin 20: FOP - Public Review and Comment*). Though both contribute to operational planning, the FOM and FOP are not synonymous.

Following the establishment of an FLP and, simultaneously, the forest landscape area (FLA), agreement holders applying for CPs before having a FOP must continue to depict those proposed cutblocks on the FOM. After an agreement holder has an approved FOP, all newly proposed cutblocks and roads must be engaged on through the FOP process.

2.0 Transition Process from FSP to FOP

The transition from an FSP to a FOP is a key step in implementing the FLP framework. The transition process ensures continuity of operations while introducing new requirements for planning and engagement. This section outlines the legislative requirements, procedural steps, and timelines that enable this transition, supporting agreement holders in meeting compliance and operational objectives.

In this bulletin, the term 'FLA establishment' denotes the point at which the forest landscape area (FLA) is formally established alongside the FLP. The legislation for transitioning from an FSP to a FOP explicitly refers to the FLA. Throughout this document, spatially explicit terminology is used for clarity and consistency with the legislation.

Transition period means the period referred to in FRPA sections 2.48 (3) and 2.48 (4) during which an agreement holder is exempt from section 2.35 (2) of FRPA.

2.1 FLP Establishment

An FLP must be established for an area before a FOP can be submitted for approval. The FLP sets strategic-level direction that guides operational planning under FRPA. FLP outcomes and planning guidelines inform the core content requirements for a FOP. Accordingly, FOP content and approval are directly tied to the strategic direction set out in the FLP.

Once the FLP is in place, approval of a FOP is contingent on meeting legislated requirements, including, but not limited to:

- Required content of a FOP (FRPA s.2.36)
- Mapping requirements such as the location of proposed and existing cutblocks and roads (FRPA s.2.36 (2), FPPR s.4.11 (1)-(3))
- Any substituted requirements in place of planning guidelines (FRPA s.2.37 (2)(b))
- Any practice requirements and additional measures (FPPR Part 4, s.4.39 (a))
- Engagement with First Nations (FRPA s.2.38 & FPPR Part 1.1 Division 4)
- Public Review and Comment (FRPA s.2.38 & FPPR Part 1.1 Division 5)
- Review and comment from other rights holders (FPPR s.4.36).
- Reports to the minister on engagement (FPPR ss. 4.29 & 4.37)

Refer to the suite of FOP-related FRPA Bulletins for further information.

2.2 Preparing a FOP before FLA Establishment

Although a FOP cannot be submitted for approval until the applicable FLA and FLP are established, certain components of the FOP may be developed concurrently with the FLP, particularly in the latter stages of FLP development. This parallel work can streamline the transition and reduce delays once the FLP and FLA are in place.

Actions that may proceed prior to FLP and FLA establishment include:

- Developing FOP maps that identify proposed and existing cutblocks and roads, key landscape features, and areas subject to harvesting constraints or special management – aligned with FPPR Part 1.1, Division 3 [*Mapping Requirements*]
- Preparing other FOP content, such as incorporated planning guidelines, substitute requirements, additional measures, practice requirements, and stocking standards – aligned with FPPR Part 1.1, Division 2 [*Information Requirements*]

Note: certain legal requirements, including First Nation engagement and public review and comment, cannot begin until after the FLP is established (FRPA s.2.38; FPPR Division 4).

2.3 Coordinating with the Natural Resource District

FOP submitters are encouraged to meet with the SDM or review team in the applicable Natural Resource District during FOP development. Early and ongoing communication provides an opportunity for feedback and helps clarify expectations regarding content and timelines. When preparing a FOP, agreement holders should also consider any guidance provided by the District Manager and make any changes, as considered appropriate by the agreement holder, prior to submitting the FOP for approval.

2.4 Multi-Party FOPs

Under FRPA sections 2.35 and 20.26, a FOP may be developed and submitted by more than one person. Multiple parties may either collaborate on a single FOP submission or join an existing approved FOP with the Minister's approval (FRPA s.20.26). A FOP may be jointly submitted by several agreement holders, or Timber Sales Managers (TSMs) and agreement holders together. This flexibility allows licensees operating within the same area to coordinate operational planning, streamline approvals, and reduce duplication of effort while ensuring alignment with the FLP. Decision makers may encourage voluntary collaboration among agreement holders in an FLA to develop one FOP to improve administrative and engagement efficiencies.

2.5 Transition Timelines

The date of FLP establishment is the date on which the notice of the order is published in the BC Gazette or a later date specified in the order, if any (FRPA s.2.21 (3)). Establishing an

FLP triggers several processes under FRPA, including creation of a FLA and timelines for submitting FOPs and phasing out FSPs.

Once an FLA is established, agreement holders must have an approved FOP before harvesting, building roads, or applying for new cutting or road permits (FRPA s.2.35). However, transitional provisions temporarily exempt holders of existing FSPs from this requirement (FRPA s.2.48 (3)). The exemption period depends on when the FOP is submitted:

- **The FOP is submitted within 6 months of FLA establishment** – The exemption continues to apply until the FOP is either approved or rejected, (FRPA s.2.48 (4)(b)).
- **The FOP is submitted 6 months or more after FLA establishment** - The exemption ceases to apply one year after the FLA establishment date (FRPA s.2.48 (4)(a)). After that, an approved FOP is required to apply for new cutting or road permits (FRPA ss.2.48 (2) and (3)).

Note: CPs and RPs previously authorized under an FSP remain valid even after the FSP ceases to apply (FRPA ss.2.49 (a) and 20.23). This is explained in more detail under section 3.0 of this Bulletin.

Submitting early (within 6 months of FLP establishment) allows the FSP to remain in effect longer, reducing operational risk and administrative delays. Submitting later shortens the period the FSP applies, increasing the likelihood of a gap in operational authority. See Table 1 for a comparison of these timelines.

2.6 FSPs Covering Areas both Inside and Outside an FLA

Where an existing FSP applies to an area that is partly within a newly established FLA, the transition provisions only apply to the portion inside the FLA. For activities outside the FLA, the FSP continues to apply under its approved term and content.

2.7 FSP Extensions

Agreement holders may request an FSP extension to bridge the period between FSP expiry and FOP approval. Extensions may be granted at the discretion of the SDM under FRPA s.6 (2) and FPPR s.28. FSP holders should ensure that sufficient time remains on their FSP until the FOP is approved.

2.8 FSP Amendments

Amendments to an FSP are treated differently depending on whether they were submitted before or after an FLA is established.

- **Before an FLP/FLA takes effect:** If an amendment was submitted prior to the FLA being established, it may still be approved under FRPA s.2.48 (3).

- **After an FLP/FLA is established:** Once an FLP is in place, an FSP cannot be amended for portions within the FLA if the amendment extends an FDU into an FLA (FRPA s.16 (1.02)). However, the minister may approve other types of amendments related to FDU's located within an FLA, provided they do not result in boundary changes to the FDU. For example, amendments to results and strategies within an existing FDU in an FLA may occur. **Note:** that the transitional time frame still applies; an FSP is valid up to one year from FLA establishment or until the FOP is approved.

3.0 Transition Process – Cutting Permits

In accordance with FRPA section 2.49, this section outlines cutting permit validity once an FLA has been established.

A. CP protections: pre-existing CPs

Cutting permits issued prior to the establishment of an FLA remain valid under their original terms (FRPA ss.2.49 (a) and 20.23). In summary:

- Permits are valid for the lesser of four years or the remaining term of the permit (*Forest Act* s.52.08 (1)(2)).
- All pre-existing CPs held by an agreement holder must be shown on any future submitted FOP map (FRPA s.2.36 (2)(a)).

The process for applying for and authorizing CPs during the transition period is unchanged from the existing FSP regime.

B. New CP approvals during the transition period

Cutting permits may be applied for throughout the transition period. CP applications must show proposed and existing cutblocks on the FOP map to satisfy FOP mapping requirements and avoid later amendment to the FOP (FRPA ss.2.36 (2)(a) and (b)). The District Manager retains discretion to approve or deny CP applications during the transition period (*Forest Act* s.52.03).

4.0 Transition Process - Road Permits

Road permit provisions during the transition period from FSP to FOP align closely with those for CPs under FRPA ss.2.36, 2.48 and 2.49. The submitted FOP must include both a map and list that identifies proposed and existing roads, as well as RP applications. This requirement ensures that road development considerations are fully integrated into operational plans. Please refer to relevant provisions in the FPPR, as well as *FRPA Administration Bulletin 17: FOP Content and Mapping Requirements* for more details.

4.1 FOP Submission Requirements for RPs

A submitted FOP must show:

- The location of existing roads, inside and outside of existing or proposed cutblocks;
- The general locations of all proposed roads that are intended to be the subject of a road permit during the term of the forest operations plan (FRPA s.2.36(2); FPPR ss.4.11, 4.21 and 4.22); and
- The year proposed for construction and deactivation, if applicable (FPPR s.4.21(1)).

4.2 FOP Amendments Triggered by Road Changes

Road locations must be depicted accurately on the FOP map (FRPA ss.2.36 (b) and (d))). An amendment to a FOP is required where a proposed road differs from the proposed location shown on the submitted or approved FOP. Minor changes that do not materially alter the proposed road location shown on the FOP map do not trigger a FOP amendment.

4.3 Road Permit Amendments

Road Permit amendments (not to be confused with a FOP amendment) occur frequently to reflect status updates to a road segment (e.g., shortened, transferred, reassigned, retired, or re-engineered). RP amendments **do not** trigger an amendment to the FOP, as there is no significant change to the road location.

RP amendment requests by agreement holders are reviewed by district staff to ensure they qualify as an RP amendment or require a new RP application.

Table 1: FOP submission timelines based on FLA establishment

Timeline	Process	FRPA Section	Impact
Day 0 FLP/FLA Established	FLP order is brought into effect (either via publication in Gazette or date specified in the order), officially establishing the FLP and FLA.	s.2.21	The FSP remains valid for now, but new FOP submission timelines begin.
0 – 6 Months Submit FOP Early	If the FOP is submitted within 6 - months of FLP/FLA establishment, the existing FSP continues to apply until the FOP is approved or rejected. It is recommended to submit the FOP within this window.	s.2.49(b)	CPs and RPs may be applied for and issued under the FSP prior to FOP approval. CP/RP approval is subject to the discretion of the District Manager.
After 6 Months Delayed Submission	If the FOP is submitted after the 6-month mark, the FSP will cease to apply to the FLA one year after FLP/FLA establishment.	s.2.48(4)(a)	Pre-existing CPs that were issued under the FSP may be used during this time. Once the FSP ceases to apply to the FLA, an agreement holder may not apply for CPs or RPs until the FOP is approved.
1 Year After FLP/FLA Establishment	For any FSP holder that has not submitted an FOP within six months, the FSP ceases to apply inside the FLA.	s.2.48(4)(a)	No new CPs or RPs may be applied for after the one-year mark.
CPs and RPs Issued Under FSP	CPs issued under an approved FSP remain valid after FLA establishment and through to their expiry.	s.2.49(a), <i>Forest Act</i> s.52.08	Approved CPs remain valid for four years (unless specified otherwise).
New CPs During Transition	CP applications can still be submitted under an approved FSP until it expires (or until the FOP is approved or rejected), but District Managers retain discretion to approve or deny.	<i>Forest Act</i> s.81(4)	To support a smooth transition, it is recommended to communicate with district staff to determine whether the FOP or CP approval process should be prioritized. While CP applications may still be

			submitted, doing so may delay the approval timeline for the FOP.
Timber Sales Licenses During Transition	TSLs are to conform to the plan that the TSL was advertised under.	FRPA s.20.23(2)	Once BCTS's FOP is approved, all TSLs must be advertised in conformance with the FOP.

5.0 Provisions Specific to BCTS and Timber Sale Licenses

During the transition period, timber sale licenses (TSL) are to conform to the plan in place on the day the TSL is advertised. This allows TSLs to be advertised and carried out under the FSP regime while the transition period is underway (FRPA s.20.23 (2)).

Once an FLA is established, FRPA ss.2.48 and 2.49 exempt TSMs from requiring a FOP during the transition period (FRPA s.2.35 (3)), consistent with other agreement holders. However, once the transition period ends, a TSM may not invite applications for a TSL, issue an RP or construct a road to access a TSL without an approved FOP (FRPA s.2.35 (3)). After FOP approval, all TSLs must be issued under the FOP.

If an invitation for a TSL results in a failed bid and the FOP is subsequently approved, the TSL must be re-advertised under the FOP. Regular communication with the SDM can inform the TSM whether the submitted FOPs are approaching approval. This timing may influence whether the TSL is to be advertised under the FSP or await FOP approval and be advertised under the FOP.

5.1 BC Timber Sales Provisions Relating to Road Permits

If the FOP is or will be held by a timber sales manager (TSM), the map must show the location of each existing road that is continuous to or within five kilometers of horizontal distance from the centerline of a proposed road that the TSM intends to construct during the term of the FOP.

6.0 Questions and Answers

1. What happens to approved FSPs when an FLA is established?

Agreement holders that have an approved FSP before the establishment of an FLA can continue to operate for specific periods specified under FRPA (see section on FLP Establishment above, and FRPA s.2.48). Once the applicable transition period elapses, they must submit and hold an approved FOP to continue operations. However, while transitioning from the FSP to FOP regime, approved cutting or road permits under the FSP are unaffected by FOP requirements.

If part of an area of an FDU under an FSP falls within the Forest Landscape Area (FLA) boundary, pre-authorized CPs and RPs may be carried out within the FLA. In order to apply for new CPs and RPs, the agreement holder must submit and gain approval of a FOP within the specified timeframe. The portion remaining as an FDU under an FSP located outside the FLA may continue business-as-usual operations until the term of the FSP expires. For portions of an FDU that do not overlap with the FLA, the FSP must be amended to remove the FLA portion from the FSP.

2. If a community forest agreement (CFA) holder is signed onto an FSP with a major licensee, and the CFA decides to not be part of the major licensee's FOP process, what happens to the CFA at FLP/FLA establishment? Does the CFA still operate under the major licensee's FSP?

Note: Under FRPA 2.2, a community forest agreement is defined as located within the Coast Forest Region and includes Crown land of more than 800 ha or located outside the Coast Forest Region and includes Crown land of more than 1 200 ha.

The FSP ceases to apply to the FLA but remains active for all FDU or parts thereof that are located outside the FLA. Therefore, if the CFA is excluded from the FLA, that FSP is still applicable. Under FRPA 20.26, an amendment may be requested to remove a party (major licensee) from the plan. Ultimately, the CFA should consider having their own FSP. Pre-existing CPs are still valid throughout this transition time.

3. For BCTS, when should FOP preparation begin?

This begins at the FLP establishment date. If no specific FLP establishment date is prescribed in the FLP Order, then this is the date the order is published in the BC Gazette. If a TSL was advertised before an FLP was established then it is not affected by FLP establishment, and the TSL holder will follow the requirements in the operational plan it was advertised under.

Unlike CPs and RPs, during the transition period TSLs are to conform to the plan they were advertised under.

4. What if there are no bids occurring on the TSL, and subsequently the FOP is approved?

Under this scenario, the TSLs would need to be re-advertised under the FOP requirements.

7.0 Resources and Contact

7.1 Legislative Links

- Forest Act [Forest Act \(gov.bc.ca\)](http://gov.bc.ca)
- Forest and Range Practices Act [Forest and Range Practices Act \(gov.bc.ca\)](http://gov.bc.ca)
- Forest Planning and Practices Regulation [Forest Planning and Practices Regulation \(gov.bc.ca\)](http://gov.bc.ca)

7.2 Legislative References

Forest and Range Practices Act (FRPA)		Forest Planning and Practices Regulation	Forest Act
s.2.21 (2)	s.6	s.4.5	s.52.03
s.2.35	s.16 (1.02)	s.28	s.52.08
s.2.36	s.20.23	s.4.11	s.81 (4)
s.2.48	s.20.26	s.4.21	Part 8
s.2.49		s.4.22	

7.3 Resource Links

- Forest Operations Plan - [Forest Operations Plan - Province of British Columbia \(gov.bc.ca\)](http://gov.bc.ca)
- Forest Landscape Plan - [Forest landscape plans - Province of British Columbia \(gov.bc.ca\)](http://gov.bc.ca)

7.4 List of Acronyms

Acronyms	Full Name
CP	Cutting permit
FLP	Forest Landscape Plan
FLA	Forest Landscape Area
FOP	Forest Operations Plan
FPPR	Forest Planning and Practices Regulation
FRPA	<i>Forest and Range Practices Act</i>
FSP	Forest Stewardship Plan
RP	Road permit

7.5 Contact

If there are any questions about the content of this bulletin, please contact the Forest Science Planning and Practices Branch: frpa.support@gov.bc.ca

For more FRPA Bulletins topics, visit:
[Forest and Range Practices Act implementation tools - Province of British Columbia \(gov.bc.ca\)](http://gov.bc.ca)