



January 28, 2020

Old Growth Strategic Review Panel
Garry Merkel and Al Gorley
Via Email: oldgrowthbc@gov.bc.ca

Re: Old Growth Strategic Review

Dear Mr Merkel and Mr Gorley:

I write to you on behalf of BC Nature (the Federation of BC Naturalists), which represents more than 50 naturalists' clubs and 6000 members province-wide. Our membership consists of dedicated naturalists, including scientists, who are connected to, have expertise in, and concern for the preservation of British Columbia's landscapes and the diversity of organisms that inhabit them. We support any effort to promote the integrity of our natural ecosystems, not only to protect their biodiversity, but also our lives and the lives of future generations in British Columbia.

As a naturalists' organization, we value the now rare old-growth forests of BC not only for their intrinsic beauty, but also for their role in conservation of biodiversity, including the habitats of endangered and threatened species, such as mountain caribou. BC Nature has campaigned and joined others to protect old-growth forests, including those on private land. If these forests continue to be logged they will likely prove irreplaceable because of climate change. Older forests, especially coastal ones, store a significant amount of carbon. In contrast, logging and reforestation create a major carbon source and contribute to the climate crisis; thus we call for the protection of older forests as a critical link to conserve habitat and biodiversity and mitigate climate change. BC Nature calls for an immediate moratorium on logging of old-growth forests and that this cessation be enshrined into law. Protecting old-growth forests is an urgent action needed now to sustain biodiversity, mitigate climate change, and provide a just and sustainable future.

We are in a biodiversity and climate crisis, as well as in a period of severe decline in our forestry sector. Ending the logging of remaining rare old-growth forests in BC is but one step needed. A new progressive and holistic approach to forest management in BC must also occur. BC Nature would like to see the following actions:

- Government work with Indigenous Peoples, communities and groups to implement a science-based Old-Growth Protection Act.
- Ensure that managed forests are monitored not only for timber production, but also for effective ecosystem processes and services inherent to them, and for biodiversity maintenance and enhancement.

- Honour Indigenous Peoples' rights through the United Nations Declaration on the Rights of Indigenous Peoples and other processes of reconciliation. Consider Indigenous Protected Areas in order to preserve primary forests.
- Safeguard jobs in the forest industry, including transitions from some present forest occupations to others. Diversifying and localizing the forest industry should be embraced as the new norm, including much greater emphasis on value-added production, mill-revitalization, and enhanced forest stewardship, and furthering other efforts towards truly sustainable forest management. Consider banning the export of raw logs.
- Enact forest management policies and laws consistent with existing and expected new environmental, social, and economic conditions, in the short and long-term. We insist that these laws and regulations be closely monitored and enforced by government, and enlist the help of all British Columbians to act as stewards who foster resilience and sustainability on all fronts.

To help facilitate the conservation of old-growth forests, BC Nature supports the creation of a provincial land acquisition fund. This fund would allow the provincial government, in partnership with other levels of government, corporations, and groups (e.g., Nature Trust of BC, Nature Conservancy of Canada, The Land Conservancy) to purchase and protect private lands with old-growth forest (along with other lands of high conservation value) to establish new protected areas across BC. BC Nature suggests partnerships with universities and the Coastal Douglas Fir Conservation Partnership, as appropriate, to create a strong assessment tool that will be based upon science, funded, and applied to maximize value and benefits.

BC Nature is aware of the long history of changing policies and regulations regarding land use in BC, and difficulties resolving the wants of a variety of stakeholders. BC Nature values the sustainable resource stewardship and management goals expressed by our current government, and will continue to contribute to the engagement process. Members of BC Nature are pleased to see the government continue this work on old-growth forests and would be happy to communicate with you further about conserving these important ecosystems.

Yours truly,



Cornelis (Kees) Visser, Ph.D., P. Geol.
President, BC Nature