

January 29, 2020

Mr. Gary Merkel
Mr. Al Gorley
Old Growth Strategic Review Panel

via e-mail: oldgrowthbc@gov.bc.ca

Dear Mr. Merkel and Mr. Gorley:

Re: Old Growth Strategic Review

The Canadian Association of Petroleum Producers (CAPP) is the voice of Canada's upstream petroleum industry, representing companies, large and small, that explore for, develop and produce natural gas and oil throughout Canada. CAPP's member companies produce about 80 per cent of Canada's natural gas and oil. CAPP's associate members provide a wide range of services that support the upstream oil and natural gas industry. Together CAPP's members and associate members are an important part of a national industry with revenues from oil and natural gas production of about \$109 billion a year.

CAPP and our members appreciate the opportunity to provide comments to the Old Growth Strategic Review Panel on improving old growth forest management in British Columbia. We hope Panel members found our meeting in early January to be informative and beneficial in obtaining information about oil and natural gas development, and how our industry works with, and values old growth.

We would like to offer the following comments for consideration when formulating recommendations to government on old growth management.

Early and Appropriate Engagement of the Oil and Gas Industry

It is essential that government enable early and effective input from the oil and gas industry on identifying and designating OGMA's. Previous OGMA's have largely been determined between forestry and government with little consideration of the province's subsurface resources or input from the oil and natural gas industry. This is challenging for developing the province's oil and natural gas resource as oil and gas operators have limited ability to influence their placement on the landscape and cannot simply move operations elsewhere to access subsurface resources but must also adhere to surface and development constraints within OGMA's. Engaging with oil and natural gas industry before OGMA's are designated will help alleviate and minimize surface and environmental conflicts, and minimize additional costs associated with altering development planning and mitigating surface impacts

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Legislative Complexity and Cumulative Burden on the Landscape

British Columbia is a legislatively complex environment. There are currently several provincial and regional initiatives that relate directly and indirectly to old growth forest management that are concurrently being engaged upon at different phases of design and implementation. Whether it is the Provincial Wildlife Management and Habitat Conservation Policy; the BC Species at Risk Act; Regional Strategic Environmental Assessment; or the Fort St. John Land Resource Management Plan modernization and Restoration Framework; all of these planning initiatives will have implications for old growth and other environmental values in the province.

CAPP is concerned that if these planning initiatives are not designed to be cohesive and complementary, the outcomes will not be well-coordinated between ministries to achieve long-term objectives. If not carefully designed, overlapping land use initiatives have the potential to create conflict between values and confusion about where the authoritative and durable resolution of these issues are to occur. The multiplicity and layering of these initiatives should be clearly articulated, designed to be complementary; and well-coordinated between ministries. It is our perspective that outcomes must be meaningfully integrated and provide clear guidance for development planning, which will allow for increased predictability with respect to project assessment and/or regulatory authorizations, in turn reducing cost and uncertainty for industry.

Data, Oversight and Tools for Working within Old Growth Areas

CAPP members recognize the importance of old growth value and already assess projects for potential impacts on OGMA in their development applications submitted to the Oil and Gas Commission through their Area Based Analysis (ABA). It is important that government gives consideration to industry's current efforts to mitigate impact on this value, and the importance of maintaining a one window regulatory approval process through the Commission.

It is also essential that data and all other inputs assessing old growth and landscape conditions reflect up-to-date inputs and information in setting management objectives. Maintaining and enhancing tools for managing footprint within OGMA will also be important to ensure development can proceed, and that longer term market access objectives can occur while concurrently managing for old growth and other environmental objectives.

Value Variability and Outcomes Based Management

CAPP recognizes that old growth forests are an important tool in managing biodiversity objectives. That being said, not all old growth forest areas are equal, and biological attributes can differ from one OGMA to the next. Given the historical focus on managing for timber and aggressive fire suppression practices over the last several decades, CAPP members question if the current age class distribution of old growth forests represent a "natural" system, and query how this will be sustainable under a drier and warmer climate.

Further questions raised in our discussion included:

- How will this be given consideration in the process of identifying and establishing future old forest/OGMA targets?
- How will government plan to manage the old growth value over space and time?
- To what extent is climate change being considered as a factor in determining how much old growth can be sustainably retained on the landscape?

Flexible management strategies that are outcome focused and consider broad scale influences like climate change over space and time should be considered by government when assessing old growth management objectives for the province.

In summary, CAPP would like to highlight the importance of including the upstream oil and gas industry in consultation as early as possible to align and integrate surface and sub-surface planning. Management strategies should also be flexible and outcome based; and old growth management must be collaborative and coordinated with other legislative, policy and land use planning frameworks in British Columbia to reduce conflict and redundancy.

CAPP looks forward to further collaborative engagement on old growth forest management in British Columbia, and looks forward to working closely with government if legislative amendments are contemplated in the future.

If the panel has any questions on our submission or would like further information on issues related to oil and natural gas development, we would welcome the opportunity of meeting with you again.

Please feel free to contact me directly (778.265.3819) or geoff.morrison@capp.ca if you have any question or clarifications.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Geoff Morrison', is written over a light blue grid background.

Geoff Morrison
Manager, British Columbia Operations
Canadian Association of Petroleum Producers

cc: Chris Pasztor, Exec. Director, Oil and Gas Div. Ministry of Energy, Mines and Petroleum Resources
Dale Morgan, Acting Regional Exec. Director, Ministry of Indigenous Relations and Reconciliation
Sean Currie, VP Operational Policy & Development, BC Oil and Gas Commission
James Cuell, Ministry of Forests, Lands, Natural Resource Operations and Rural Development