



**INTERFOR**

January 31, 2020

Old Growth Strategic Review Panel  
Garry Merkel, RPF and Al Gorley, RPF  
By email: oldgrowthbc@gov.bc.ca

Dear Mr. Merkel and Mr. Gorley

**Re: Old Growth Strategic Review**

We appreciate the panel members taking the time to come meet with our staff on November 8, 2019 and listen to our perspective regarding old growth management. As a follow up to our conversation, we offer the following comments and recommendations to inform the conversation regarding old growth management.

We support the Province investing time and resources to assess the applicability and effectiveness of the current management regimes for old growth protection. Effectiveness monitoring is an essential component of responsible and sustainable management for all resource values.

The foundation of resource management is striking a balance between environmental, social and economic needs. The Province has developed a significant network of legislation and policy that provides for the long-term protection of old growth. This framework lets us set aside areas for biodiversity, old growth, wildlife, riparian, karst, recreation, and visuals to provide long-term ecological protection. As a result, it is estimated that over 2.8 million hectares (81%) of old growth will never be logged on BC's coast as it is outside the timber harvesting land base or will be needed to meet additional requirements such as riparian buffers and stand level retention.

Overall, the area of protected forests on the coast has more than tripled since 1991. The coastal region of British Columbia is approximately 15 million hectares in size, of which just over half (8.4 million hectares or 56%) is covered in forests. Of that 8.4 million hectares of forest, 3.5 million hectares, almost half is old growth. More than half (55%) of Crown old growth forests on BC's coast are legally protected in parks and protected areas, as well as other conservation reserves. There is no shortage of forests and there is no shortage of old growth forests.

Conversely, the area of the provincial forest that is available to support the sustainable harvest levels is constantly eroded. Over the last 15 years, the allowable annual cut has decreased by 15% from 19.3 million m<sup>3</sup>/year to 14.5 million m<sup>3</sup>/year.

Interfor is not supportive of a moratorium on old growth logging for three reasons:

First, further limiting access to old growth would further reduce the timber harvesting land base overall making it more difficult for the forest industry to be profitable and maintain the jobs—both rural and urban—that it creates.

Second, the transition to second growth harvesting is already taking place. Today, second-growth harvesting accounts for approximately 50% of the annual cut on Vancouver Island, up from 5% in 1995.

Third, approximately 50% of our business is currently dependent on old growth harvesting and many of our projects are reliant on a component of old growth to make them economically viable.

Interfor's business in coastal BC supports \$175 million of economic activity annually. This is dollars in the pockets for more than 700 contractors and their families living in mostly rural communities on Vancouver Island and on the mainland coast from Gibsons to Prince Rupert.

Interfor urges the Province to support the continued transition to second growth harvesting in a manner that allows the forest industry to retool in a measured way and ensure a vibrant sustainable industry and a healthy forest.

Our forests are a cornerstone of the provincial economy and British Columbia's way of life. Forestry in British Columbia is responsible for more than 140,000 jobs, contributes \$4 billion in taxes, royalties and fees to various levels of government. In 2017/18, the industry contributed over \$1 billion dollars of revenue to provincial government.

On December 19, 2019 at a public meeting in Port Hardy, Minister Doug Donaldson, Minister of Forests, Lands, Natural Resource Operations and Rural Development, recognized that the coastal sector is dependent on old growth and that old growth harvesting will continue on Vancouver Island. Mr. Donaldson said, "I know that logging old growth will continue to be part of what happens on Vancouver Island because it supports communities and support loggers and supports the industry." This message was repeated several times that day.

It is important that the Old Growth Review Panel recognizes and considers this commitment when putting together its recommendations and that the Province honors Minister's Donaldson's commitment to the people who live and work on the Coast and on Vancouver Island.

We appreciate this support from Minister Donaldson and expect the Province to live up to these commitments by:

- providing continued access to harvest old growth;
- supporting the continued transition to second growth in timelines supported by the sector; and
- allocating resources to educate the public, providing information regarding how much old growth is protected and will not be harvested and how the forests in BC are managed sustainably.

Forest management objectives may change overtime. However, it is essential for the business certainty and stability that provincial policies are built on sound scientific, independent information.

There is not an old growth crisis, but if these well-intentioned initiatives continue to erode the working forest, there will be a crisis in the forest industry which will impact all British Columbians.

Yours truly,  
**Interfor Corporation**

A handwritten signature in blue ink, appearing to be 'Tania Barnes', written over a circular stamp or seal.

**Tania Barnes**  
Manager, Sustainable Forestry

