

**Jan 30 2020**

**RE: Old Growth Review**

NWH Canada Inc. is proud to work in the forest sector in British Columbia our business supports many families with wages earned through sustainable forest management. We are proud to be part of a sector that contributes millions of dollars to provincial government revenues every year. Contributions from the forest sector as you well know are from not only stumpage but all the various taxes and spin off employment that are a result of our works.

The whole forest sector in BC works as a unit, any interruption or change in one sector will inevitably have significant impacts to other parts of the forest sector. We stand with our fellow forest workers and practitioners in support of no change to the rules governing old growth harvest in BC.

Forestry in BC is responsible for more than 140,000 jobs. The sector contributes \$4 billion in taxes, royalties and fees to various levels of government and contributed over \$1 billion dollars to provincial government revenue in 2017/18.

There is no shortage of forests and there is no shortage of old growth forests. The area of protected forests on the coast has more than tripled since 1991. The province has set aside areas for biodiversity, old growth, wildlife, riparian, karst, recreation, visuals, big trees. 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. It is estimated that over 2.8 million hectares (81%) of old growth will never be logged as it is outside the timber harvesting land base and additional requirements to leave areas such as riparian buffers and stand level retention. We are supportive of the forest sector having continued access to harvest old growth.

While the amount of forests being protected has tripled since 1991, the AAC on the coast had declined by 25%. The sustainability of the harvesting is supported by the Chief Foresters determinations of what is a sustainable amount to harvest each year. The province continues to impact the cost structure of the forest sector with various initiatives such as the Coast Forest Sector Revitalization Initiative which has added cost to our business and limited our opportunities. This initiative has resulted in increased costs and reduced operations to the point of the curtailment and shut down a number of operations and mills on the coast. The coastal industry provides numerous benefits to BC as a whole and with support, this can grow.

The transition to second growth harvesting has been happening for the last 25 years and will continue over the coming years. Today, second-growth harvesting accounts for approximately 50% of the annual cut on Vancouver Island, up from 5% in 1995 and will continue to rise as the industry manages its transition to second growth. I urge the province to support the continued transition in a manner that allows the forest industry to retool in a measured way that ensures a vibrant sustainable industry and a healthy forest.

We are not supportive of a moratorium on old growth logging. Considering the high amount of old growth protection that already exists, the small annual harvest rate to further limit access to old growth would be an irresponsible economic and social decision that negatively impacts all communities in British Columbia.