



January 23, 2020

Dear Garry Merkel and Al Gorley,

Probyn Log Ltd. appreciates the opportunity to contribute to the *Old Growth Strategic Review* process. Since 1969 Probyn Log Ltd. has actively participated in the BC Forest Sector as a direct and indirect employer of Loggers, Road Builders, Foresters, Professional Consultants and others who collectively contribute to and depend on the forest sector. Additionally, we support many small, medium, and large mills that rely on old growth logs. We take great pride in our long-standing partnerships with First Nations and many other forestry dependent businesses.

Continuous harvest of late seral and old forests is crucial to the success of our business and that of our partners. In 2019, nearly half of the logs Probyn harvested were sourced from old growth forests. In the future, Probyn will harvest an increasingly larger portion of second growth forests, as the vast areas of immature forests age to maturity. To sustain current levels of economic activity, we must harvest timber profiles consistent with those defined in Timber Supply Reviews. In most of our operating areas, this means harvesting a relatively high portion of old growth forests for the next few decades. If Provincial Policy further reduces the area of Old Growth forests in the Timber Harvesting Land Base, we will be forced to either reduce harvesting or target young second growth forests, which are critical to our mid-term timber supply. Neither option supports First Nations, communities or businesses which rely on the forest sector.

Particularly in rural areas, such as those where we collaborate with First Nations (Mid, North, and West Coast), we harvest a higher percentage of old growth forests, as second growth forests are either too young or economically non-viable. In these remote areas, we face some of the highest operating costs in the Province, which pose challenges for second growth harvesting, particularly in poor market conditions. Old Growth logs that produce unique, high-quality products diversify us from domestic and global competitors. When market demand for commodity forest products was strong, we, along with our partners, could profitably harvest many second growth forests on the coast dominated by Western Hemlock and Amabilis Fir (Balsam); these favorable market conditions have come and gone. As it has in the past, foreign demand for commodity forest products will increase, and with it, increased prices for second growth fiber. In rural areas of the coast without access to old growth forests, we are extremely vulnerable to adverse economic conditions in the commodity market.



It is no surprise that innovative measures are necessary to support perpetual, economically viable second-growth harvesting in rural areas of the coast. We are confident that, over time, innovation will prevail through decreased delivered log/lumber costs, thereby increasing the economic viability of second growth harvesting in expensive, rural locations. We are hopeful that targeted initiatives, such as the *Economic Opportunities* initiative led by the Coastal First Nations and the Province will identify opportunities to increase competitiveness and increase local employment. Although the future is promising for sustainable second growth harvesting on rural areas of the coast, the industry is not yet equipped to overcome the economic and logistical challenges.

While we respect the range of opinions of BC residents and interest groups who have stake in B.C.'s crown forests, we ask that you recognize First Nations, communities and businesses poised to suffer from restrictive old growth policies. We ask that you consider policy recommendations that support residents of rural B.C. and all British Columbians who benefit from revenue generated from the forest sector. We recognize that you can't ignore the voices of British Columbians opposing old growth logging. As a starting point, we recommend educating members of the general public on existing forest policies and current measures of old growth protection. Education is a crucial first step before soliciting meaningful input on a topic as complicated and important as old growth forest management. We also recognize that many of our employees, although well versed in forest policy and practices, are poorly equipped to provide meaningful insight on matters of urban significance; for the same reason, we kindly request that you keep in mind the knowledge and experience of all contributors to the Old Growth Strategic Review. We are waiting anxiously, alongside First Nations, rural community members, and businesses to learn how the outcomes of this review might impact our lives, families, and future.

Thank you for the opportunity to contribute to the Old Growth Strategic Review.

Respectfully,



Terry Basso, RPF
Owner