

The Honourable Doug Donaldson, MLA
Minister of Forests, Lands, Natural Resource Operations and Rural Development
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Victoria, BC V8W 9E2
Sent by email: oldgrowthbc@gov.bc.ca

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Dear Ministry of Forests, Lands, Natural Resource Operations and Rural Development,

The following is the TLA's response to government's request for input on the Old Growth Strategic Review.

1. What old growth means to you and how you value it.

The Truck Loggers Association's 500-member companies represent independent timber harvesting contractors operating within British Columbia. They are the link in the supply chain that harvests trees and delivers logs to sawmills and pulp mills. Our role is to advocate on behalf of our members to ensure people who work in BC's forests share in the prosperity of the forest resource.

The harvesting of old growth timber doesn't just represent livelihoods of contractors, their employees, and the mills that rely on this type of fibre, it represents the livelihoods of all their suppliers, from equipment dealers and mechanics to tire and grocery stores.

In terms of understanding the impact of a reduction in harvesting of old growth, that impact can't be isolated as to what a cubic metre of old growth represents as a metric such as employment. The use of timber types harvested is intertwined in the efficient and sustainable functioning of the industry, meaning a potential policy to reduce old growth harvesting would have a multiplier effect impact on the industry, beyond what that single cubic metre of harvested timber has been calculated to represent.

An analogy of the intertwined indirect impact is similar to the understanding of log exports. Some want log exports reduced. However, what is not often recognized is that the export premium of log exports helps to support domestic sawmills and pulp mills access sub-economic timber that otherwise would not be harvested. That is to say, the harvesting of old growth western redcedar or yellow cedar, that tends to be of higher value, supports the harvesting and utilization of lower value HemBal or other lower log grades/species that our domestic forest product manufacturers rely upon.

2. Your perspective on how old growth is managed now

Conservation efforts thus far have set aside sufficient old growth timber types as described below. Due to those efforts, the province will never run out of old growth timber.

Eco-system based forest management or EBM is one attempt to engineer an image of managing for old growth forest values that is practiced in the Great Bear Rainforest. We strongly advise against this practice being promoted across the remainder of the province as it would have a similar effect to just banning old growth timber harvesting

altogether. Evidence of that impact has already been seen when the Great Bear Rainforest was created back in the early 2000s which resulted in mill closures, contractors' businesses ending and millions of dollars in compensation paid out.

The question that the government must honestly answer is, who are we managing old growth for? ENGO interest groups with loud voices, the people of the lower mainland who have no understanding of current forest management practices, or the people and the industry that rely on old growth timber to sustain their livelihoods, their communities and contribute to the financial well-being of the province?

Old growth is sustainably managed now because it considers environmental, social, cultural and economic interests together:

1. Environmentally

BC has already protected a significant majority of its rainforests and old-growth.

BC is the most sustainably managed forest region in the world.

Under the Forest and Range Practices Act and regulations, we manage our Crown forests for different resource values that include recreation, soils, sustainable timber supply, wildlife, water, fish, biodiversity, visual landscapes and cultural resources.

Reforestation ensures the opportunity to sustainably manage BC's forests for generations to come and the newly planted trees help our fight against climate change by fixing carbon as they grow. In fact, the carbon stored in wood products made from BC forests can remain sequestered for 100 years and beyond.

By law, all areas harvested on public land in BC must be reforested. Every year, more than 200 million trees are planted in BC.

Portions of the working forest are harvested over time, replanted and grown into another healthy forest to be shared and then harvested again.

The province has more forested land under third party environmental certification than any other country. On the coast, the Industry harvests only 0.3 per cent (27,000 hectares) of the coastal forest's 8.5 million hectares per year.

55 per cent of remaining old-growth forests, 500,000 hectares, are protected on Vancouver Island alone and will never be harvested. Ever. There are also millions of hectares of old growth trees protected on the BC Coast and in the Interior.

BC takes old growth conservation seriously. The Great Bear Rainforest Act, Old Growth Management Areas (OGMA) and other safeguards were created to make sure we will never, ever run out of old-growth forests.

The vast majority of old-growth forests are part of the provincial forest resource and owned by all British Columbians. Crown forests are managed with myriad values in mind, including recreation, soils, sustainable timber supply, wildlife, water, fish, biodiversity, visual landscapes and cultural resources.

Clearcutting is a cost-effective and silviculturally-effective way to regrow trees. Reforestation, which is legally mandated in BC, ensures our forests will be sustainable for generations to come, and the newly planted trees help our fight against climate change by fixing carbon as they grow. More than 200 million trees are planted every year in BC.

Carbon stored in wood products made from BC forests can remain sequestered for 100 years and beyond.

The BC government has managed for old-growth conservation through various means for over 100 years when Strathcona Park was the first park created in BC. In addition to provincial and federal parks, ecological reserves, and especially landscape unit plans established over 20 years ago. These landscape unit plans established “biodiversity emphasis option” levels throughout the province to establish OGMAs and wildlife tree retention areas.

The current proportion of coastal second-growth harvest has risen steadily over the last decade to about 50 per cent today, and that is forecasted to continue to increase. This has reduced reliance on old-growth harvest as additional areas have been protected.

In 2016, the Great Bear Rainforest Forest Act provided for designation of new special forest management areas that prohibit commercial timber harvesting activities over an area of 6.4 million hectares

In 2015, government established additional old growth management areas on the Sunshine Coast.

It is estimated that more than two thirds of old-growth timber on Vancouver Island’s Crown land is already protected, which is a considerable increase over the past decade.

2. Socially

There are relationships between the forest sector and backcountry tourism for skiers, mountain bikers and hikers who gain access to the forest on forest-industry service roads. None of this would exist if not for a forest resource sector that includes harvesting some old-growth timber.

3. Culturally

BC’s old-growth forests are part of the provincial forest resource and owned by all British Columbians. As residents, we are fortunate to be able to share this working forest for many uses.

4. Economically

Old growth creates jobs and is critical to the economy of the province, largely in rural areas. Our forests – primary, intact and old growth currently support 140,000 total jobs in BC through timber harvesting and manufacturing forest products.

Old growth timber can yield 1,500 – 1,800 m³ per hectare vs. second growth is 400 – 600 m³

BC is gaining more traction with companies using old-growth wood to reach high-end markets, producing engineered wood products and drawing in millions of new investment dollars.

The 2018 COFI PriceWaterhouseCooper (PwC) forest industry report (which uses 2016 figures) places the BC forest industry's contribution to gross domestic product (GDP) at \$12.9 billion through direct, indirect, and induced impacts.

Old growth logs have higher value and are globally sought after for fine grain and applicability to high-end building products

Harvesting coastal old growth represents almost half of the coastal harvest. Reductions of such would impact coastal sawmill and pulp mill sector as well. Depending on how Interior forests are classified as old growth, there could be significant impacts to operations throughout the interior as well.

3. How you think old growth can be managed more effectively in the future

Before any bold changes to old growth policy or legislation are made, we should look to see if there is indeed a problem that needs to be solved. Where is the evidence that our province is not managing old-growth forests effectively? And who gets to decide if what we are doing is effective or not? Countries like Uruguay and for that matter much of Europe, have essentially no natural forests left, why should we be held accountable for their past wrongs? The good news is that relative to the failures of other nations to manage their natural forests, we have been highly effective at managing our natural forests with our past and current efforts, yet hardly to do we ever celebrate that. There is evidence that we are deficient in understanding timber inventories. And there is ample evidence that government has failed to educate the public on the virtues of forest management and how we manage for old-growth timber values.

We believe that further reductions in our working forest, including through bans or restrictions on old-growth timber harvesting, as well as promoting EBM or a version thereof, is not a tolerable outcome. Enough is enough in terms of reducing the amount of timber areas to operate within. Mill closures on the BC Coast have largely come as a result of such reductions. We demand no more reductions to our working forests.

Managing old growth more effectively in the future needs to continue to consider environmental, social, cultural and economic interests together:

1. Environmental

Land use planning (LUP) during the 1990s established OGMA and other retention legislation to manage for biodiversity. We recommend a comprehensive assessment of how these LUP have performed. However, LUP processes are concerning because when have they ever actually increased the amount area to the THLB? LUP processes tend to reduce the size of the working forest. Individuals that have no investment or stake in the LUP subject area, often have strong influences over the LUP process, to the detriment of people and industry that derive their livelihoods from the subject area and generate economic benefits for all British Columbians.

Fossil fuel substitution effects need to be properly quantified and recognized.

I recommend co-locating species habitat with old growth to minimize unnecessary reductions in the THLB.

I recommend continued research into the habitat that rare and iconic species use.

I don't support wider application of ecosystem-based forest management practices beyond the Great Bear Rainforest

2. Social

I recommend that an assessment be done to actually determine how much "old forests" are actually used by recreationalists and how much substitution can be done with other forests.

Educate the public of current efforts to manage old growth including the amount of areas already set aside.

3. Cultural

Local Indigenous must be involved in planning in their territories. I recommend that any old-growth planning within their territories must be done inclusively with local Indigenous peoples.

This process and its outcomes must take into consideration that old-growth forests are not just large diameter older

trees, but in fact include older trees that can be quite small in diameter. That distinction must be made, especially if recommendations are made about future forest management. Currently government is proposing a Legacy Tree Policy that would address public's general concerns of cutting larger diameter trees.

4. Economic

We recommend that an acceptable economic model or process be developed to look at the cost benefit of logging and tourism, with a focus on the symbiosis that the two activities have.

As we have presented in the [Spring 2018 issue](#) of *TruckLogger* BC magazine TLA analysis has shown that the banning of old-growth timber harvesting on Vancouver Island would lead to the immediate closure of four sawmills and one pulp mill. Evidence of such potential impacts is already clear with the current USW/WFP strike – the immense hurt to people and communities is abundant. We can only imagine that impacts would be similar to other parts of the province, if the harvesting of older timber types were restricted across the province.

Regards,

A handwritten signature in black ink, appearing to read 'D. Elstone', with a long horizontal stroke extending to the right.

David Elstone, RPF
Executive Director