



1250 Brownmiller Road
Quesnel, BC
Canada V2J 6P5

Telephone: (250) 992-9244
Fax: (250) 992-9233

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Engage BC – Old Growth Review, Formal Submission

West Fraser was established in Quesnel at Two Mile Flat in 1955 by three brothers, and has grown to become the largest lumber producer in North America. Lumber is the core of our business and the interior forest sector. We are an integrated and diversified forest products company with BC businesses in lumber, plywood, MDF, pulp, pellets, and electricity production. We understand the components of integrated manufacturing and strive to use all parts of the tree.

Our forest tenures are located across a broad and diverse range of forest landscapes in the interior of BC. We have supported a long history of shared stewardship in the sustainable management of BC forest resources with the Province. We are thankful for the opportunity to provide this submission to the Province. We are strongly aligned with and supportive of the Council of Forest Industries (COFI) Old Growth Strategic Review submission. This submission emphasizes elements of the COFI submission more specific to West Fraser.

Within the forest landbase where we operate our tenures, we are in the wake of widespread mountain pine beetle impacts, and are observing other bark beetle populations are increasing at epidemic rates of infestation leading to paramount risk of further losses to timber and impacts to other resource values. Climate change vulnerabilities are increasingly evident; instances of drought-impacted forests are on the rise, and wildfire impacts have reached unprecedented severity and scale in recent years. It has become clear to us in this paradigm of incredible change across multiple environmental metrics that “Old Growth” is not the same everywhere, and the management of Old Growth also cannot be applied in a consistent way across the multitude of diversity that exists on our forest landbase. Old growth needs to be considered in a broader context that is adapted to over-arching macro elements influencing forest conditions and vulnerabilities, and it needs to be managed within the context of a broader forest strategy. This is what seems to be missing today in the current and historical approaches to old growth management.

Old growth management needs to occur in concert with designing and maintaining healthy and resilient forest landscapes that are adaptable to climate change. More conservation is not required, but instead more effective delivery of existing conservation designations should be the focus. Many of the current old growth management areas are not management areas at all. They are areas preserved in a static condition and are forests in decline or have been lost all together due to natural disturbance regimes of forest health agents and fire. Old growth needs to be defined on an attribute basis, and the terminology Old, Growth, and Management should be challenged. Perhaps “Old Growth Management” is simply seeking forest areas that represent old forest attributes for biodiversity, and these attributes need to exist in a certain balance or threshold that varies by ecosystems across the Province. This then becomes something we can actively manage and sustain spatially and temporally – measured broadly at the forest landscape level versus discrete static polygons.

West Fraser sincerely hopes this submission will be given serious consideration and will contribute effectively to a modernized approach to Old Growth Management in BC. We would be happy to further explore and discuss any of the dialogue and recommendations in this submission and look forward to further opportunities to participate in this important initiative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Mycock". The signature is fluid and cursive, with the first name "Jeff" and last name "Mycock" clearly distinguishable.

Jeff Mycock, RPF
Chief Forester - BC
West Fraser