



**WILDERNESS**  
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Dear Gary Merkel and Al Gorely,

I would like to submit the following on behalf of the Wilderness Committee, for your consideration under the Old-growth Strategic Review. Please accept this written submission to augment the presentations from Charlotte Dawe, Joe Foy and myself on December 12, 2019.

Thank you for your work on this critical issue – we await your report eagerly.

Sincerely,

Torrance Coste  
National Campaign Director

**Wilderness Committee Submission to the**

# Old-Growth Strategic Review

## Big themes:

- Balance: how over-prioritized logging has been in compared to other values
- Jobs fallacy: the same system and forces that endanger old-growth hurt jobs and communities
- Elephants in the room: reconciliation and climate crisis
- Endangered species in the crossfire

## Introduction:

As one of BC's leading environmental groups advocating for old-growth forests, the Wilderness Committee is closely following this strategic review process. It's outcome will have a profound impact on our work, the places we fight for, and the tens of thousands of people on whose behalf we work.

Frankly, our feeling is that this strategic review should have been undertaken a decade or two ago -- in many regions, old-growth has been logged to the brink, and the compounding ecological, cultural, and socio-economic impacts of that are now a serious problem.

The Wilderness Committee works across BC to ensure citizens are informed and empowered with knowledge about what is really happening on this province's cherished landscapes and in its life-giving ecosystems. We use our resources, skills and experience to advocate on behalf of wilderness and wildlife, and mobilize people in all our communities to take action on the issues that impact them.

We work in communities, in the woods, and in digital spaces to reach people where they are and provide them with what they need to know.

Across the vast majority of the province, most of the original forest has been logged, and is in various stages of regeneration. The Wilderness Committee is by no means an anti-logging organization, nor are our supporters or most people we meet and engage on this issue.

What we're calling for is balance -- so much has been sacrificed so that we can draw benefits from logging old-growth forests. It's now time to leave what's left of these ecosystems for their dozens of other uses and benefits.



### **The value of standing old-growth surpasses its worth as timber or fibre**

The reason this review process is so much work, the reason your public consultation has received hundreds of meeting requests and thousands of submissions, is because old-growth forests have so much value.

You'll be familiar with the value of these forests and the resources within them to industry -- some of the best wood in the world comes from here in BC. But there are also dozens of other values placed on these forests, some of them tangible, like their worth to BC's booming ecotourism industry, and others harder to quantify, such as their ability to improve spiritual well-being in our communities.

Two different people from two completely different walks of life could value the same old-growth forest for two totally different reasons. In an organized society, this places tremendous responsibility on the government to ensure these values are fairly balanced.

All the controversy, all the tension in BC's forests, both now and over the decades, boils down to the loss of balance between these competing values.

In short, the timber and fibre value of old-growth forests has been placed above all other values, over the vast majority of the land base, with only a few exceptions. Even the terms of reference for this strategic review lists the non-forestry economic benefits, and the environmental, cultural and social significance of old-growth after its value as timber and fibre. This is problematic, for two reasons.

Firstly, it's not fair to have one value prioritized almost always, especially when other values include major public priorities such as reconciliation and combating climate change.

Second, of all the values for and uses of old-growth, logging is the most mutually exclusive. If an old-growth forest is logged, most of its additional values and other uses are gone forever. Left standing, that same forest could provide cultural value to the Indigenous Nation in whose territory it grows, recreational value to neighbouring communities and tourism businesses, and ecological value to endangered species that depend on mature forests to thrive. What's more, these overlapping activities can take place again and again, rather than the one-time use and benefit that old-growth logging provides.

Despite this, the vast majority of forested land in BC is designated for logging first, with all other uses and values fitting in where possible.

Increased protection of old-growth is often framed by industry as "radical" or as going "too far," but in reality, maintaining the status quo is the most radical thing we can do.

### **On-the-ground reality misrepresented by government**

This imbalance in forest management is maintained through a lot of hard work by the large corporations in the forest industry -- keeping so much priority on logging and forestry in our management decisions is in their best interests, after all.

But government too plays a significant role in this, and the prioritization of logging over other values dominates management decisions and is even present in the way it presents the data on remaining old-growth.

The distinction between different types of old-growth (variations on age class, elevation, productivity and other measures) varies in government briefing notes and fact sheets, always presented in the format that justifies continued harvest.

More inexplicable, though, is the presentation of protected old-growth as a percentage of remaining old-growth, rather than of the original extent.

On Vancouver Island, for example, the government claims that more than 400,000 hectares of old-growth is protected -- a figure we seriously question, as it appears to include non-legal and voluntary no-go areas in the total. What's more, it routinely refers to this number to claim that "half the old-growth is protected," when in reality 400,000 hectares is roughly half of remaining un-logged original forests, including all low-quality and high elevation forest types. By presenting the statistics in this way, the percentage of protected old-growth will continue to increase as old-growth logging continues. In fact, if we stay on our current trajectory and log all remaining old-growth outside of

parks, we'll eventually get to "100% protected old-growth," when in reality only about two per cent of Vancouver Island's Age Class 8-9, low elevation old-growth forests will be standing. A child would tell you this is absurd, because it is.

## **Jobs fallacy**

Since the inception of the environmental movement, the argument against conservation and protecting old-growth forests has been a simplistic one: doing so will hurt jobs.

No one is more familiar with this argument than we are. And while this has always been frustrating in its simplicity, the last decade has shown just how little correlation there has been between conservation and jobs reduction. While we've lost stand after stand of old-growth, and fewer and fewer valleys remain un-impacted by logging, the industry is also in turmoil -- curtailments, mill closures and job losses now dominate the news headlines far more than environmental battles do.

[We argue that](#) logging companies close mills and cut jobs for the same reasons they continue to log the last of the old-growth, and that the [crisis in old-growth forests](#) and the crisis in the forest industry have the same root causes.

If the on-going logging of old-growth can be decoupled with job-growth (the equivalent of thirty-four soccer fields per day of old-growth have been logged on Vancouver Island alone in the past decade, a time period over which the industry has lost an average of six jobs per day) then the reduction of jobs can absolutely be decoupled with forest protection, if it ever was linked.

While few argue that BC's forest industry will ever return to its former level, there is strong evidence that maintaining jobs will come not from forgoing conservation but from re-organizing the industry around secondary processing and value-added manufacturing.

Several reports outline the [job losses associated with raw log exports](#) and the [problems in forest tenureship](#) in BC.

A [2018 report from former BC cabinet minister Bob Williams](#) outlines how shifting forestry rights and tenures to First Nations and regional governments could not only improve environmental outcomes but also create more jobs.

A government that has not implemented any meaningful structural change to stem the loss of jobs in BC's forest sector simply cannot in good faith use potential job losses as rationale for continuing to stall on protecting old-growth.

The BC government must pinpoint a sustainable level of harvest in forest districts across the province, assess the number of jobs that can realistically be sustained from

that harvest, and then legislate accordingly and invest in transition training for jobs that cannot be maintained.

The long-term cut in BC will not include substantial volumes of old-growth, so our short term planning should seek to phase out old-growth logging as soon as possible.

## **Reconciliation and climate change -- the elephants in the room**

The BC government has long worked hard to silo related issues and challenges into separate departments and even separate ministries. Things that are intricately intertwined with forestry are still kept apart, and seem to come into play only in special cases, and only when they don't hinder the overriding goal of forest management in BC: access to timber.

This isn't tenable over the long term, and in 2020, BC's forestry regime is bumping up against two of our most important provincial and national priorities.

### **Old-growth and reconciliation**

Everyone in BC wants a better relationship with the peoples and Nations indigenous to the lands and waters this province encompasses. That means taking action across a huge range of areas, and fundamentally rethinking almost all of our policies and laws. When it comes to resource management, it means addressing the dispossession of Indigenous Nations of natural resources, and stemming the consequences of the loss of the ecosystems Indigenous cultures are based in. In short, it's the responsibility of settlers and our governments to allow Indigenous peoples to freely utilize resources, lands and waters as they did prior to colonization.

Focusing down to old-growth, it is unreasonable to expect that reconciliation will be possible if Indigenous peoples do not have access to adequate amounts of intact original forests. As Indigenous leaders like Tla-o-qui-aht master carver Joe Martin argue, [old-growth is vital to First Nations' cultures](#) and should be protected for that reason.

Indigenous cultures in this province are tens of thousands of years old, and the protection of forest ecosystems of the same age must be prioritized in forest management if BC is to meet our goals around reconciliation.

### **Old-growth and the climate crisis**

Climate change is the most serious challenge our species has ever faced. And again, despite the relationship between forests and climate change, the two are mainly dealt with separately in BC. The provinces' climate change strategy contains little regarding the role of forests, and BC forest policy mentions climate change primarily in the context

of adaptation and the need to change forestry and fire response plans in light of shifting weather patterns.

It's understandable why successive provincial governments have avoided linking forests and climate change strategy. The correlation isn't a happy one: since the early 2000s, forests in BC have put more carbon into the atmosphere than they've taken out, and [emissions from forests now equal or even surpass our emissions from all other sources](#).

Some in the logging industry argue that forestry, including old-growth logging, is a "climate-friendly" practice, but experts are fairly clear that [old-growth forests are more effective at storing CO2](#). In fact, new research shows that logging old-growth results in thirteen year "carbon dead zones" -- as [replanted forests take more than a decade to offset the carbon released as a result of logging](#). Additionally, old forests do a better job regulating temperatures and water flows, and [science is clear that leaving these ecosystems intact is the best way to mitigate climate change](#) as well.

By continuing to log old-growth, BC is laying down both our sharpest sword and our strongest shield in the fight against climate change.

## **Old-growth as a refuge for species**

The world-renowned biodiversity and rich landscapes that draw people to BC have developed and evolved over millennia. When it comes to forests, these attributes require forests undisturbed by industrial activity to be sustained -- they simply cannot be replicated in tree plantations between zero and one hundred years old.

BC is the richest province in Canada in terms of plant and animal species diversity, yet it remains one of only two provinces without its own endangered species legislation. The current government vowed to change this when it was elected, but has since walked away from that commitment, and is actively resisting habitat protection as a means of preventing species extinction.

Our work to protect species highlights habitat protection as not just one possible action, but the most effective measure to protect species. In lieu of stand-alone endangered species legislation, the government of BC must set aside old-growth forests to ensure the protection of old-growth dependent species.

### **Species in profile: Caribou**

Among the species impacted by old-growth logging in BC, one of the most well-known is the southern mountain caribou. At least six herds of southern mountain caribou are now locally extinct in B.C: the Purcells Central, Monashee, George Mountain, South Purcells, South Selkirk, and Burnt Pine.

Only protecting old-growth forests will provide southern mountain caribou with the habitat they need. Additionally, protecting old-growth will save so many other species that could otherwise be headed for the same fate as caribou. The plight of mountain caribou has caused conflict, confusion, spent resources and money -- the government to avoid hundreds of similar scenarios by protecting as remaining old-growth in BC.

#### Old-growth logging impacts on caribou

To date, BC has spent significant time and resources on attempting to recover caribou, yet they continue to decline. Past measures to protect caribou have mostly been band-aid or short term solutions such as wolf culling and maternity pens, while widespread destruction of their habitat continues. In fact, our new [report](#) provides evidence that 81% of the caribou subpopulations in BC have habitat destruction levels surpassing thresholds required for recovery and survival. These thresholds were assigned in the 2014 recovery strategy and under SARA the province has a responsibility to effectively protect critical habitat. Our report shows that we've already logged too much of the habitat for these herds to recover on their own, and allowing further logging will not provide caribou a chance at ever becoming self-sustaining in the long term.

As government spends time and resources on other conservation measures, logging in caribou critical habitat is ongoing. Attempting to recover this species without protecting habitat is like adding water to keep a bucket full while also jackhammering holes in the bottom. These measures will be for nothing if habitat protection and restoration is not undertaken.

Southern mountain caribou, and many other species, rely on old-growth forests. Once logged, forests in caribou range can take over 100 years to become suitable again for southern mountain caribou. Logging old-growth in critical habitat alters forests to a point that is unsuitable for caribou and also create conditions that result in increased predation. What was old growth forest is transformed into young seral forest that moose and deer seek, and increasing those populations draws in wolves and other predators which in turn leaves caribou especially vulnerable.

Old-growth logging is altering entire ecosystems and predator-prey interaction. We are dooming these herds and the only way to halt the extinction of caribou is to stop logging their habitat by banning old-growth logging. After habitat is protected other short term measures can be explored to keep populations stable while their habitat recovers.

### The issue is industry, not caribou

The way that governments have allowed the logging industry to operate is not only detrimental to caribou, but also to the viability and long term survival of rural communities. As the current forestry crisis highlights, BC's forest resources have not been managed in a sustainable way. This puts caribou, forest ecosystems and communities at risk. Logging forests at rates that surpass the rate of regeneration, especially when coupled with disasters such as the 2017 and 2018 wildfire seasons and the mountain pine beetle epidemic, sets up the economic and environmental crises underway in BC's forests. Major forest companies have made billions of dollars in profit over the last few decades, while BC has received job losses in the thousands, mill closures and curtailments, and the loss of caribou herds in return. These losses outweigh the benefits provided by this industry, and as such the current industrial forestry model is not working for communities, ecosystems, and species at risk. Once again, it's time for a shift towards balance.

### Banning old growth logging will ultimately save money and species

By banning old-growth logging and instead investing in advanced silviculture and value-added production, the BC government will give species like caribou a shot at survival. For too long, industrial forestry has operated on a model of extracting value from forests -- it's time to shift to a model based on regenerating it and adding value to our forests.

Southern mountain caribou is one of the first species in BC on a fast track to extinction. We've seen how expensive, controversial and difficult the task was to create plans which would help protect caribou in the Peace Valley region. This will happen again and again, for dozens of other old-growth dependent species if we fail to protect old-growth habitat.

Further, BC has a responsibility under SARA to effectively protect critical habitat for species at risk. As more species slip into threatened and endangered status, the public will demand their protection, as per SARA. In order to avoid a similar backlash and costly scenarios like the caribou partnership agreement, the province must ban old-growth logging to protect the hundreds of species that rely on these forests now, and avoid more of these expensive nightmares down the road.

## **Recommendations for government**

The following are recommendations (not in order of importance or priority) for steps government can and should take to address the old-growth crisis.

### **1) Seek a Dialogue with First Nations on how Old-Growth Protection can be Integrated into Indigenous-Led Land Use Planning, New Governance Models, and Economic Initiatives**

Many of the province's existing land use plans are out-dated and fail to align with the current political and legal authority of BC's First Nations. However, only in a few parts of the province have indigenous land use plans been recognized and supported by provincial legislation and policies, notably in Haida Gwaii, Squamish and Lil'wat territory, and in the Great Bear Rainforest. The province should seek a dialogue with First Nations on how old-growth can be integrated into their land use plans, governance models, and economic initiatives. It should support the development of and formally recognize First Nations land use plans, Tribal Parks, and protected areas.

### **2) Develop an Old-Growth Forest Protection Act**

The BC Government must develop a science-based, legislated plan that includes targets and timelines for protecting old-growth forests in all forest types based on best available science, including stronger protection for cultural old-growth values (such as Culturally Modified Trees); halts or quickly phases out logging of old-growth depending on their degree of endangerment; and establishes an extensive system of old-growth reserves that are selected using science-based criteria.

### **3) Support Conservation Financing Solutions and Economic Diversification for First Nations Communities**

Many First Nations communities earn significant revenues from old-growth logging, yet lack a range of alternative economic development opportunities that would support their local economies into the future and allow them to transition away from old-growth logging, should they wish to. In order to protect old-growth forests on a large scale in BC, the provincial government should fund *conservation financing* solutions to support First Nations sustainable economic development as an alternative to old-growth logging, similar to the \$120 million (including \$30 million in provincial funds) provided to nations in the Great Bear Rainforest in support of ecosystem-based management in that region. This is a fundamentally important precursor for the large-scale protection of old-growth forests in BC and for the NDP government to effectively implement its commitment to applying ecosystem-based management (EBM) to old-growth forests across BC.

### **4) Support a Sustainable, Value-Added Second-Growth Forest Industry**

While most of the Western industrialized world is logging 50- to 100-year-old stands, including second-, third-, and fourth-growth forests, the status quo of old-growth liquidation is still underway across much of BC. By strengthening forest practices regulations and reducing the excessive rate of cut (i.e. implementing longer rotation

ages), BC can achieve sustainable, second-growth forest industry. At the same time, if the BC government were to promote policies that support greater processing and value-added manufacturing of second-growth logs in the province, the total number of forestry jobs could be sustained and even increased in the province while old-growth logging is quickly phased out.

The following policies are recommended to support value-added, second-growth forestry jobs:

1. Implement regulations or tax incentives to retool old-growth mills to process second-growth logs and to develop new second-growth mills and value-added facilities (for example, by forgoing the PST on new mill equipment and reducing stumpage fees or property taxes for companies which invest in second-growth mills).
2. Use stumpage fees to expand markets for sustainable, value-added, eco-certified, second-growth forest products in various international jurisdictions, while discontinuing the marketing of old-growth and raw logs.
3. Ensure a significant portion of BC logs harvested by tenure holders is sold through regional log sorts that make wood available to smaller mills and value-added manufacturers.
4. Curb raw log exports by banning old-growth log exports and increasing the fee-in-lieu (i.e. log exports tax) on second-growth log exports to curb their export and encourage domestic processing.
5. Diversify tenures to include more Community Forests and First Nations tenures in order to create local jobs and facilitate the expansion of a value-added forest industry.

### **5) Immediately Declare a Moratorium for Old-Growth Hotspot Sites to Create a *Solution Space* while Long-Term Solutions are Developed**

Some old-growth forests are considered to be greater conservation priorities than others. These include stands that are more extensive and intact, have high cultural significance for First Nations, consist of rare forest types, are of high significance for wildlife and species at risk, are located in drinking watersheds of local communities, are particularly grand, and are of particular importance for recreation and tourism. It is recommended the BC government declare a moratorium for old-growth hotspot sites, thereby creating a *solution space* to determine the future regarding the possibility of long-term protection through legislated provincial conservancies or parks. This is especially urgent given the lack of stand-alone endangered species legislation in BC.

### **6) Expand the Existing Forest Reserve Network**

The NDP government introduced a system of forest reserves in the 1990s, including Old-Growth Management Areas (OGMAs), Wildlife Habitat Areas (WHAs), Ungulate Winter Ranges, Visual Quality Objectives, Riparian Management Zones, and Recreation Areas. This reserve system has not been fully implemented, leaving vast areas of old-growth forest vulnerable to logging. The new government should fully implement the forest reserve system by converting all non-legal reserves into legally

binding ones and expand the system to protect additional endangered old-growth forests. This can be done by quickly implementing the Big Tree Protection legal tool currently under development by the Ministry of FLNRORD and enhancing it to include the province's grandest groves. In time, these reserves would be replaced by a new system of forest protection under an Old-Growth Protection Act - the implementation of which will take some time. It is further recommended that the government remove the existing 1 per cent cap on how much forest reserves may affect the timber supply.

#### **7) Use Government Control Over BC Timber Sales' Planning and Operations to Accelerate Conservation of Endangered Old-Growth Forests**

BC Timber Sales (BCTS) is the BC government's logging agency that plans and directly issues logging permits for about 20 per cent of the province's merchantable timber on Crown lands, which fall outside of forestry tenures. As the BC government retains full control over which cut blocks are auctioned each year through BCTS, the incoming government should use this control to quickly phase out issuing timber sales in old-growth forests in these areas.

#### **8) Phase out Old-Growth Logging in the Allowable Annual Cut**

Currently, the government's Timber Supply Branch fails to distinguish between old-growth and second-growth harvest levels in the Allowable Annual Cut (AAC) of each timber supply area (TSA) and tree farm licence (TFL). In order to more effectively manage the rate of old-growth logging, the BC government should apportion the Allowable Annual Cut so it distinguishes between old-growth and second-growth cut allocations in order to scale-down and phase out old-growth cutting, according to the conservation needs identified by the independent science panel.

#### **9) Establish a Land Acquisition Fund to Protect Endangered Ecosystems on Private Lands.**

Many of BC's most endangered and biologically rich and diverse ecosystems, including many old-growth stands, are found on private lands, which constitute about 5 per cent of the province's land base. Establishing new protected areas on private land requires the outright purchase of lands from willing sellers. To this end, the B.C. government should implement a minimum annual \$40 million provincial Natural Lands Acquisition Fund, which could increase by \$10 million/year until the fund reaches \$100 million/year. The proposed fund would enable the timely purchase of significant tracts of endangered private lands of high conservation, scenic, and recreation value to add to BC's parks and protected areas system and resolve countless land use battles in the province.

## **Concluding thoughts**

From our perspective as one of BC's leading environmental organizations, the protection of this province's remaining old-growth forests is long overdue.

Our planet is facing acute climate and biodiversity crises, and it's the responsibility of jurisdictions like ours to do everything we can to combat them. Protecting remaining old-growth forests is one of the most concrete steps we can take here in BC, and we owe it to our children and to people around the world to commit to this.

For the better part of a century, timber and fibre value has been prioritized above all other values and benefits provided by old-growth forests. Ending old-growth logging and protecting these precious ecosystems is not a radical move but a thoughtful step towards balance.

Finally, the Wilderness Committee would like to thank you for undertaking this work on behalf of all British Columbians. We recognize this process has been a long and onerous one, and our organization is grateful to you for your efforts.



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