



November 15, 2021

The Honourable Katrine Conroy, BC Minister of Forests, Lands, Natural Resource Operations and Rural Development: [FLNR.Minister@gov.bc.ca](mailto:FLNR.Minister@gov.bc.ca)

Dear Minister Conroy,

RE: Bill 23 – Forest Statutes Amendment Act, 2021

BC Nature (the Federation of BC Naturalists), which represents more than 50 naturalists' clubs and more than 6000 members, wishes to provide some general input about the management of both timber and non-timber forest resources in BC's provincial forests.

As you are aware, the forest management regime is complex, in part because there is no clear provincial government separation between management and protection of the full range of forest resources and the regulation of the forest industry. Thus, BC Nature cannot presume to make comprehensive and credible suggestions on the details of draft legislation such as Bill 23. However, we can highlight our most important issues in regard to the Bill. But first, we congratulate you and your ministry for beginning the process to defer harvest of ancient, rare and priority large stands of old growth within 2.6 million hectares of B.C.'s most at-risk old-growth forests.

On to Bill 23. Unfortunately, the most significant problem with forest management in BC is not addressed at all by Bill 23. This is the constraint imposed by the arbitrary, but crippling, chief forester's policy that has for decades interpreted the phrase "unduly reducing the supply of timber from British Columbia's forests" in the *Forest Planning and Practices Regulation* as requiring that non-timber forest values cannot have more than a 6% impact on timber supply. That barrier must be removed, or at least seriously reconsidered, and reflect biodiversity science, not just short-term economics.

That policy cap is BC Nature's biggest concern, one that dwarfs the positives. Nevertheless, we see some positives. BC Nature strongly supports the intent of Bill 23 to have forest practices planning again done solely by government, not by a mix of government and the forest industry. While industry must of course be consulted, the very close involvement of industry in the actual drafting of legislation, as was done for the original *Forest and Range Practices Act*, was short sighted conduct by the government of the day. Consultation should have also involved input from First Nations and environmentalists, to balance out the influence of industry,

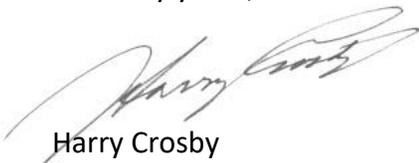
BC Nature also supports the creation of the new forest landscape planning framework. The responsibility and approval of those plans will be the responsibility of government, but Bill 23 puts accommodating indigenous rights and title up front. That is positive, but it means that substantial consultation with community, environmental and industry stakeholders will be necessary for the plans to be sustainable, accommodate multiple values and be resilient going forward.

Further, we caution that current landscape unit planning, although urgently needed, will require dedication of serious resources if it is not to atrophy (as it did previously). And proper scale will be essential. This should be a tactical level of planning, integrating how things will work on the ground in relation to access to timber supply, road networks, wildlife habitat networks, watershed protection, environmentally sensitive areas, and so on. That needs to be done at a scale where one can see management units on the ground with adequate information on multiple resource values. This simply cannot occur if the new plans cover very large areas such as entire timber supply areas or tree farm licences.

Finally, BC Nature strongly supports the participation of indigenous nations in forest planning and decision-making and, of course, provisions to increase opportunities for public input and transparency.

As the past decades have proven, the conflict of interest inherent in having the forest industry too closely involved in drafting the regulatory regime has resulted in the need for major revisions. But unless that 6% policy cap is removed, the management and conservation of the full range of resources on the public's forest land cannot meet the noble objective of managing our forests for future generations by ensuring that forest health and the public good are considered first.

Sincerely yours,



Harry Crosby  
President, BC Nature

cc. The Honourable George Heyman, BC Minister of Environment and Climate Change Strategy:  
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