

20 Reasons to Reform or Dismantle BC Timbers Sales

The following outlines a case against BC Timber Sales to the best of our knowledge.

BCTS is invited to make corrections if we are factually incorrect about anything.

1. **BCTS is the government. Democratically elected governments are supposed to do what is best for the people. In legal terms, unlike timber companies, BCTS owes a trust duty to British Columbians. BCTS owes loyalty as fiduciaries to the public which is not the case with corporations.** The environmental movement has been trying to target specific multinational corporations for over 40 years, with next to no progress. These companies are almost impossible targets. Corporations exist to make as much money as possible and appease shareholders, and for the most part, they operate by the rules. By contrast, BCTS, being a part of Ministry of Forests is part of the government making the rules. There is a myriad of evidence showing BCTS manages their considerable land base (about 17% of unprotected forests in BC) for the sole value of timber extraction while ignoring all other values on the land: Indigenous title, leadership and stewardship, biodiversity, wildlife, human sanctuary, flood minimization, watershed protection, true sustainability, and saving what is left of the drought-reducing evapotranspiration effect of mature rainforests. BCTS has no legal basis to prioritize their self interests over the public interests and yet they do.
2. **BCTS has protections and benefits that corporations don't have.** BCTS shares offices, vehicles, and protocols with the Ministry of Forests (MOF). BCTS is one and the same with MOF staff who are responsible for creating, sustaining and enforcing forestry policy. BCTS regional managers approve their own cutblocks, whereas corporations' plans must be approved by MOF district managers. Branches of the same government, or different levels of different governments, tend to "circle the wagons." When one branch of government is being targeted, they protect each other, versus actually addressing root problems. An example of this is how it seems likely that the office of the Chief Forester would give BCTS a heads up about a contentious issue on the horizon, or an upcoming amendment to the Forests Act. This is much less likely to happen with a corporation. The following article alleges that in 2023, the British Columbia forestry policing services officially known as the Compliance and Enforcement Branch (CEB), via 'General Order #5' was instructed not to '*investigate government non-compliances as that is not the current mandate*' which removed another important layer of accountability for BCTS. <https://theconversation.com/do-not-investigate-the-hobbling-of-the-b-c-forestry-policing-service-sets-a-troubling-precedent-230635>
Additionally, BCTS has the financial resources of the province on hand to push roads into remote areas where corporations might think twice about because of how long it could take to get returns on infrastructure investment.

3. **Tree Forest License (TFL) tenure reform for corporations is a lot more complex than it would be for BCTS operating areas. If urgent protection of the last remaining unprotected primary forests to avert ecological disaster is the goal, targeting BCTS operating areas is low hanging fruit.** Some suggest that the government should buy our way out of agreements with TFL holders. The costs of this approach would be astronomical. Rather, the government could bring in legislative changes to protect endangered species, habitat and watersheds and mandate a decade-long transition away from clear cut logging. Legislative change could also make the logging of definition old growth illegal. The BC NDP touts “landscape-level planning” as the future of ecologically-sound forestry in the province. However, BCTS has stated as recently as spring 2024, that landscape-level planning is only in the discussion phase and will not be implemented throughout the province through any sort of top-down approach, which is contradictory to the whole intent of landscape-level planning.
4. **BCTS, under enough fire from public opinion, will need to make concessions. Chances are those concessions wouldn't be limited to BCTS.** This is essentially what happened in 2020-21, after the largest display of public disobedience in the history of the province at Fairy Creek. Unfortunately, the bureaucrats at the top of MOF, along with consent from the elected BC NDP, masterfully concocted a work-around plan to keep logging as much old growth as possible by implementing temporary deferrals.
5. **Forestry corporations have at least some inherent reasons to manage their tenures sustainably, while BCTS does not.** A TFL holder has at least some interest in “keeping the money in the bank,” literally, growing interest as trees age and protecting the value of their saleable asset. An example of this in the Kootenays is Kalesnikoff Lumber, though they are not a multinational like the majority of TFL holders. Kalesnikoff tries to cut as little as they legally can from their own dwindling timber supply TFL, while trying to win as many BCTS contracts as it takes to keep their mill fed. Kalesnikoff has no vested interest in the future of BCTS managed lands, but their future depends on prudent management of their own TFL. Anecdotal reports from the Armstrong area indicate that Tolko Industries manages their TFL there more sustainably than BCTS manages their nearby operating area.
6. **BCTS is complicit and integrated with MOF's divisive policies around old growth logging deferrals and First Nations.** Old growth logging deferrals were first announced in September 2020, just prior to the last provincial election. These policy decisions continue to put extremely difficult decisions on First Nations. We know that deferral decisions implemented by BCTS in their operating areas have had the obvious effect of internally dividing Nations, as well as sown division between Nations. Nations were given an impossible time frame in which to respond to the question of to defer or not. No help was given to Nations to help them decide what was best for them. Initially, the

government offered Nations no conservation funding at all to offset income from logging old growth. Conservation funding continues to be minimal, haphazard and correlated to playing nice with the government. To this day, BCTS implies consent to logging old growth in territories of Nations who have not clearly stated that they support deferrals. Anyone who has taken the time to understand these issues would likely come to the same conclusion as I have; that all this was done with orchestrated intent so the BC NDP government did not have to make the hard decisions themselves through legislated changes and permanent protections.

7. **BCTS and the BC NDP backtracked on BCTS halting the logging of definition old growth.**

In 2021, the government announced that BCTS would cease logging old growth in its operating areas. In May 2023, BCTS/MOF quietly released a brief three-page document that reversed their promises to stop logging old growth.

https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/policy/may_15_2023_guidance_on_bcts_management_of_old_growth_deferrals.pdf

This simple document outlined a major policy shift that BCTS/MOF/BC NDP knew would be controversial, as 2021 polling suggests that the overwhelming majority of the population of BC is firmly against old growth logging. As the result of this backtracking, we know that BCTS has since logged iconic stands of old growth trees in areas such as the Nahmint Valley, and beside Cape Scott Provincial Park. We also know that other old growth areas are under threat of imminent logging by BCTS and are currently in the proposal stage, such as the incredibly rare, huge Interior rainforest trees in the Dome Creek/Walker Valley area. BCTS, despite being a public institution devised to serve the public, refuses to answer questions about where it is logging old growth in their 2024-25 sales schedule.

In May of 2024, leaked government mapping data revealed *'that ministry bureaucrats have rejected more than half of the proposals made by the panel to defer logging of some of the biggest and best remaining old growth trees in the province, a move that clearly favors the logging companies that the ministry regulates.'* BCTS is complicit in this. <https://www.policynote.ca/old-growth-leak/>

8. **BCTS' accepted methodologies of aging cut blocks raise many concerns.**

I have heard from forest industry professionals from around the province that BCTS logs definition old growth trees in cut blocks that BCTS has defined as younger than definition old growth. Additionally, among forest industry professionals, BCTS has a reputation for underestimating forest stand age. My personal, on the ground experience confirms both of these things. Specifically, around Nelson, proposed cut blocks that contain definition old growth trees include:

- Castlegar/Cai Creek (TA2185-3): Fire-surviving old growth within a kilometer of

Castlegar, with high recreational values. BCTS has modified their original plans due to public pressure. They now say the adapted plans exclude definition old growth, but professional tree-aging will likely prove otherwise.

- Ymir/Oscar Creek (TA1472-2): Fire-surviving old growth forest with dozens of diverse tree species bigger than 90 cm diameter at breast height (DBH), many likely as old as 500 years. This is an incredibly rich ecological environment at relatively high altitude.

- Kaslo/Robb Creek (TA2348-2): Fire-surviving old growth, hundreds unquestionable definition old growth trees of diverse species. The biggest tree measured 149cm DBH. The planned logging runs about 700m along Robb Creek with no buffer and cut block averages well over 50 degrees of slope. This corridor between Kaslo and New Denver has been almost logged out by BCTS as evidenced by satellite imagery showing almost no primary forest left.

- Bonnington/Sproule Creek (SMA034): Considerable amount of fire-surviving old growth in an area that BCTS has logged so severely over the past 20 years that there is virtually no primary forest left. BCTS used pine beetle, then fir beetle to excuse the overharvesting of these very diverse forests and refuses to answer questions about this. This area is a community watershed and sees a lot of recreational use as it is only about 8km from Nelson.

I have viewed all of these areas in person and the photos attached to this report are my own.

9. **BCTS is the biggest culprit around the province for logging where the citizens who live in the area don't want them to log.** BCTS, like all other tenure holders, has depleted much of their easily accessible supply of timber. BCTS has stated that they will be logging more front country and community watershed areas to compensate for this. Logging these areas comes with further heightened risks of wildfire, flooding, drought, and damage to precious watersheds. BCTS also simply has more of these contentious areas in their tenures than any TFL holder. For these reasons, a purely economic argument could be put forth that how BCTS operates makes no sense.
10. **BCTS is projecting nearly doubling their harvest volume over the next few years, justified under the scientifically questionable guises of wildfire mitigation and fire salvage logging.** There are dozens of peer-reviewed studies reflecting modern hydrology, climate, and forest science that indicate that BCTS/MOF's ideologies around wildfire mitigation and fire salvage logging are based on out-dated information. BCTS' current business plan estimates the volume of wood they will harvest to go from 4.4 million m³ in 2022-2023 to 8.5 million m³ in 2025-2026.
11. **BCTS is violating its trust duties to the public to steward our resources for our collective, long term best interests by not adapting to climate change.** BCTS forest management has changed minimally over the past 20 years, despite drastic changes

such as drought, flooding and increased wildfire activity due to climate change. Modern science says that BCTS practices are far from sustainable and create huge environmental and economic risks. In many places in the BC Interior, forest cover is not expected to be able to regenerate at all. For example, BCTS, along with corporate TFL tenure holders, were responsible for logging most of the natural forest in the Kettle Valley. Many forest industry professionals believe this led to the flooding of Grand Forks in 2018.

- 12. BCTS' logging practices, including clearcutting, replanting dense single-aged stands, and the suppression of deciduous trees through mechanical brushing or the arial spraying of glyphosate, dramatically increases the likelihood of catastrophic, fast-moving wildfires.** Numerous scientific studies have shown that the risk of these fires increases in the first 30 to 40 years after clearcut logging. The economic and health costs associated with wildfires far overshadow the direct and indirect economic benefits BCTS contributes to our economy. In 2023 alone, the BC government spent over one billion dollars on wildfire suppression alone and the costs of damage to property, infrastructure and health are over and above this. A strong case could be made for transforming BCTS based solely on how much they are contributing to the wildfire situation.
- 13. BCTS justifies their sustainability using an international standards group called Sustainable Forestry Initiative (SFI), yet SFI has come under scrutiny worldwide for its lack of environmental checks and balances. It is unacceptable for our provincial government to rest claims of BCTS' sustainability on this highly-flawed standard.** *"In December 2022, Ecojustice representing Greenpeace Canada, Wildlands League, David Suzuki Foundation, Alberta Wilderness Association, Wilderness Committee, Ecology Action Centre, Nature Nova Scotia, the Conservation Council of New Brunswick, and a forestry professor from the University of Toronto, filed a complaint that the Sustainability Forestry Initiative's (SFI) 'sustainable' logging certification is 'misleading' and 'false'."* SFI is currently the subject of investigations by the Competition Bureau of Canada regarding these claims. John Kayne, CEO of Canfor, arguably the most destructive forestry corporation in Canada, is a board member of SFI.
- 14. BCTS historically and currently only manages for the single value of timber extraction.** There are endless examples of BCTS ignoring First Nations' concerns while damaging or destroying riparian areas, community watersheds and aquifers, biodiversity, species and ecosystems at risk, cultural heritage resources, recreational resources, trapping, and grazing rights.
- 15. A key tenet in BCTS' current business plan is to "continue to actively engage and collaborate with key customer and supplier stakeholders."** BCTS collaborates ongoingly with the Timber Sales Advisory Council (TSAC), which is a group made up of industry lobbyist groups. These communications exclude all other values beyond timber

extraction. The groups represented in the TSAC are: Truck Loggers Association, Independent Wood Processors Association, Interior Lumber Manufacturer's Association, Interior Lumber Manufacturer's Association, Council of Forest Industries (Northern Interior), Independent Solid Wood Manufacturers, Council of Forest Industries (Southern Interior), Independent Wood Processors Association, Council of Forest Industries (Coast), North West Loggers Association, Interior Lumber Manufacturer's Association, Independent Timber Marketers Association, Interior Logging Association, and the Interior Lumber Manufacturer's Association. The terms of reference regarding TSAC states that the intent is for BCTS to "*obtain advice on the range of legislative, policy, business practice, and program performance issues germane to BCTS*" from this group.

- 16. BCTS' auction-based pricing model has an inevitable effect of driving down the price of BC's timber harvest.** BCTS' rationale for an auction-based pricing model is to ensure a reliable supply of timber to giant mills. The past 20 years of doing this have kept lumber prices much lower than they should be, and have exhausted our forests. We could change this by reducing our timber exports. Currently, about 80% of BC's harvested timber is exported, with very little of it having any value added to it. BCTS needs to change its pricing model to be based on job creation and a sustainable industry.
- 17. BCTS professes that they are aiming to increase the value-added market, but less than 11% of BCTS harvested trees get any value added to them at all beyond being turned into dimensional lumber.** BCTS/MOF could have changed this using tiered pricing, based on job creation per cubic meter harvested. The BC NDP have had 7 years in government to improve the ratio of jobs to cubic meters harvested but for the most part they have accomplished very little beyond supporting the status quo multinational forestry companies.
- 18. BCTS professionals, including foresters, engineers and geoscientists, biologists, agrologists, and science technologists and technicians are governed under the Professional Reliance Act. These are considered "self-regulating professions." BCTS will not even disclose professionals' names (foresters, hydrologists, engineers) involved in specific cutblocks. This negates even the weak oversight that is supposed to form the cornerstone of the professional reliance model.** Professional reliance has come under intense scrutiny for putting the fox in charge of the hen house, in other words, the professional foresters at Forest Professionals BC (FPBC) are in charge of policing and disciplining other professional foresters. Holding BCTS to account on things like their record of province-wide sustainability, or sustainability in a specific landscape unit, is virtually impossible under the professional reliance model of governance. BCTS will not disclose the names of professionals approving specific cut blocks, even though disclosing who is accountable is supposed to be a cornerstone of the professional reliance model. Complaints about this gap in accountability that have been made to the governing body

of professional foresters (FPBC), to the governing body of hydrologists (EGBC), and to the Office of the Superintendent of Professional Governance (OSPG), and to Bruce Rahlston, the MOF Minister himself, have all been in vain. Understanding how professional reliance works, and the systems failures, is a critical piece to understanding why forestry reform keep stalling.

19. **BCTS touts how important they are for the economy and jobs, but the evidence shows their contributions are questionable when compared to the existential realities of their mismanagement of our forests in the face of a changed climate.** In the 2023-2024 fiscal year, BCTS is only anticipating making a profit of \$37.5 million dollars – that is just \$6.79 in tax revenue generated for every person in BC. Silviculture (tree planting) spending for that same year is anticipated to be \$72.9 million. Compound this with all of the subsidies that the forestry industry receives, the degree of the mechanization of the forestry industry, and the costs associated with increased wildfires and floods, damage to watersheds and recreational opportunities, and it's pretty obvious that BCTS is not helping BC's finances. Province-wide, forestry is only responsible for between about 1.6 and 1.9% of all jobs, a number that is steadily declining and expected to fall much further. I do not refute the importance of these high paying jobs in rural communities, but moving away from clearcutting, building more value-added local mills, and strengthening environmental protections in the Forests Act would have the effect of increasing jobs over time and increasing the number of jobs per cubic meter.

20. **Unless we want to see vast areas of ice and rock with low ecological importance make up most of BC's goal of protecting 30% of our province by 2030, some of BCTS' operating area will need to be included.** There is no other way we will reach this important goal. At the very least, watersheds and front country areas in BCTS operating areas should be protected. This is what the people of rural BC want. As well, the people should demand that the small amount of accessible primary forest (forest that has never been logged) left in BCTS operating areas should be protected, as it is known that our ecosystems are in crisis. Rural residents in each area should have a say in what is chosen for protection.