

Save What's Left Conservation Society Analysis

24 Reasons Why BC Timber Sales Urgently Needs Radical Transformation

February 15, 2025, V3

This analysis argues that **targeting BC Timber Sales (BCTS)** is the most effective strategy to force transformative change in British Columbia's forest industry. **Tenure reform must begin with the government itself.** If the government—a primary offender—is unwilling to lead by example, how can we expect positive change from multinational corporations?

A future for the forest industry is possible where **sustainability and job creation coexist**. These goals are realistic, but they demand a paradigm shift. Despite promising such a shift before the 2020 and 2024 elections, the BC NDP has delivered little meaningful progress.

Save What's Left Conservation Society (SWLCS) has gradually developed a focus on BCTS as the key to reform. Conversations with logging industry workers in the Kootenays—where SWLCS is based—first identified BCTS as one of the worst offenders in managing its tenured land unsustainably. These insights were consistently reflected in BC Forest Practices Board audits and complaint investigations and have since been corroborated by prominent forestry professionals and experts. Historical satellite imagery further confirms BCTS's reputation for unsustainable practices, particularly in the Interior. **This document will continue to be updated. We welcome and encourage feedback, additions and corrections to this analysis.**

BCTS, along with the Ministry of Forests (MOF), should be the primary focus for British Columbians demanding forestry reform. To address the urgent ecological and economic challenges we face, **BCTS must be radically transformed—or dismantled entirely.**

The 24 reasons outlined in this document are divided into four sections:

Governance Failures and Trust Breach

1. BCTS is the government and has a fiduciary duty to British Columbians.
2. BCTS enjoys protections and advantages that corporations do not.
3. Forestry corporations have incentives for sustainable management, while BCTS does not.
4. BCTS fails to fulfill its public trust by neglecting climate change adaptation.
5. BCTS professionals operate under a flawed professional reliance model with weak oversight.
6. BCTS uses outdated information and mapping despite there being better information available.
7. Narrow BC Government parameters for review of BCTS (announced on January 15, 2025) fails to address systemic issues.

Environmental Mismanagement

8. The BCTS approach to aging cutblocks raises serious concerns.
9. BCTS fails to differentiate between primary and previously logged forests.
10. BCTS plans to nearly double harvest volumes, justified under the guise of “wildfire mitigation” and “salvage logging.”
11. BCTS practices (e.g., clearcutting, salvage and replanting, glyphosate application) exacerbate wildfire risks.
12. BCTS relies on flawed international sustainability standards.
13. BCTS historically and currently focuses solely on timber extraction.

Structural and Policy-Driven Issues

14. Reforming BCTS tenure areas is simpler than corporate TFLs, making it a practical target for change.
15. BCTS has failed to effectively implement landscape-level planning.
16. BCTS and the BC NDP back-tracked on halting old-growth logging.
17. BCTS prioritizes industry stakeholders and excludes broader public and environmental values.
18. BCTS’s auction-based pricing model undermines the value of BC timber.
19. BCTS has failed to promote value-added market sales in its 21-year history.

Socioeconomic and Community Impact

20. Public pressure on BCTS could trigger broader forestry reforms.
21. BCTS is complicit in divisive policies involving old-growth logging and First Nations.
22. BCTS frequently logs in areas where local residents oppose logging.
23. BCTS exaggerates its contributions to the economy and job creation.
24. BCTS areas need inclusion in the “30 by 30” conservation target to prevent low-value land from being over-represented.

Governance Failures and Trust Breach - BCTS, a government entity, has failed in fulfilling its fiduciary duties to the public.

1. BCTS is the Government and has a Fiduciary Duty to British Columbians

As a government entity, BCTS is legally and morally bound to act in the best interests of the public. Unlike timber corporations, which exist to maximize profits and appease shareholders within the rules, BCTS has a fiduciary duty to steward public resources responsibly. Yet, BCTS consistently prioritizes timber extraction over the broader public interest.

Decades of targeting multinational corporations in the environmental movement have achieved limited success because these companies are designed to operate within the existing rules—not change them. BCTS, however, is not just a player in the forestry industry—it is a rule-maker as part of the Ministry of Forests. This dual role makes BCTS a uniquely appropriate and accessible target for reform.

Despite controlling approximately 17% of BC’s unprotected forests, BCTS manages its land base almost exclusively for timber extraction at the expense of other critical values, including:

- Indigenous title, leadership, and stewardship
- Biodiversity, wildlife and wildlife habitat protection
- Human sanctuary and recreation
- Flood minimization and watershed health
- True sustainability and climate resilience

Old and mature forests, essential for maintaining the drought-reducing evapotranspiration effect, are being lost at alarming rates under BCTS management. There is no legal or ethical justification for BCTS to prioritize its own narrow agenda over the diverse and long-term interests of the public it serves, yet it continues to do so.

2. BCTS Enjoys Protections and Advantages That Corporations Do Not

BCTS operates with unique privileges as part of the Ministry of Forests (MOF), enjoying protections and resources unavailable to private corporations. This integration allows BCTS to sidestep checks and balances that corporations must navigate:

- Self-approval of logging plans: While corporations require MOF district managers to approve their plans and are required to issue a written “Notification of Decision” before issuing a cutting permit, BCTS regional managers approve their own cutblocks and roads. This lack of independent oversight fosters conflicts of interest and undermines transparent decision-making.

Timber Sales Managers (TSM) of each of the 12 BCTS business areas around the province are responsible for making decisions relating to Timber Sale Licenses (cutblock packages) going to auction. Without the MOF’s oversight, this is a conflict of interest and a clear example of regulatory capture. The TSM is bound to fulfill the BC Timber Sales License sales schedule and is therefore responsible for helping to meet the economic objectives of their business area. How can a TSM be impartial in their decision-making and fairly weigh impacts to all values under consideration before sending cutblocks to auction when short-term economic objectives weigh heavily comparatively to other values?

- Self-approval of old growth assessments and replacements: Tenure holders, including BCTS, must gather data on old growth characteristics of Old Growth Deferral Areas (OGDAs) or Old Growth Management Areas (OGMAs) they want to log or replace, respectively. While traditional TFL holders and other licensees must submit their data to be verified by a regional old growth MOF specialist, BCTS does not do so. When MOF was queried about this, they stated “it would be inappropriate for government to check government.”
- Government shielding and coordination: As a government entity, BCTS benefits from systemic “wagon circling,” where branches of government protect each other instead of addressing root problems. For instance, the Chief Forester’s office is likely to alert BCTS about contentious issues or impending legislative changes—an advantage corporations do not have.
- Reduced enforcement: In 2023, the Compliance and Enforcement Branch (CEB) of BC’s forestry policing service allegedly issued *General Order #5*, instructing their staff not to investigate government non-compliance. This directive effectively removed a critical layer of accountability for BCTS and set a troubling precedent for lack of oversight ([Do not investigate: The hobbling of the B.C. forestry policing service sets a troubling precedent](#)).

Additionally, BCTS can access the province’s vast financial resources to fund infrastructure projects, such as road-building into remote areas. These investments, which corporations might avoid due to slow returns, allow BCTS to exploit forests in regions that would otherwise remain inaccessible.

This article discusses the scale of institutional capture within MOF, of which BCTS is a part of: [B.C. Forests ministry watering down old growth protection: CCPA](#)

3. Forestry Corporations Have Incentives for Sustainable Management, While BCTS Does Not

A forest licence holder has at least some inherent motivations to manage their tenures sustainably, as their profits depend on maintaining the long-term value of their timber resources. Trees gain value as they mature, incentivizing forest license holders to adopt practices that protect and grow their saleable assets.

For example, Kalesnikoff Lumber, a local company in the Kootenays (unlike most TFL holders, which are large multinationals), demonstrates this principle. Kalesnikoff minimizes harvesting on its own dwindling forest license areas, while relying on BCTS contracts to sustain its mill operations. However, Kalesnikoff has no vested interest in the future health of BCTS-managed

lands, creating a dynamic where BCTS-managed lands bear disproportionate environmental impacts while private companies benefit.

Similarly, anecdotal evidence from the Armstrong area suggests that Tolko Industries manages its TFL more sustainably than BCTS manages adjacent lands. While private companies have long-term financial stakes in their tenures, BCTS lacks comparable incentives, as it operates under a model driven by short-term timber extraction without accountability for broader or future impacts.

BCTS is supposed to contribute 20% to the province's annual allowable cut, yet it is tasked with doing this on only 17% of the province's land base available for harvest. Mathematically, this means BCTS is harvesting at rates that exceed corporate TFLs.

In March 2023, the Canadian Centre for Policy Alternatives (CCPA) accused BCTS of undermining old-growth protection by removing over half of the areas recommended for deferral by the Old Growth Technical Advisory Panel (TAP), effectively allowing logging in some of the most valuable ancient forests. Additionally, leaked data suggests that BCTS has been substituting these high-value old-growth areas with regions containing smaller, less commercially valuable trees, thereby diluting conservation efforts ([B.C. logging firm wants to avoid cutting old growth, but province said it must pay](#)).

4. BCTS Fails to Fulfill Its Public Trust by Neglecting Climate Change Adaptation

Despite the escalating impacts of climate change—such as more frequent and severe drought, flooding, and wildfires—BCTS has made minimal changes to its forest management practices over the past two decades. These outdated methods are unsustainable, exacerbate environmental degradation, and create significant risks for both ecosystems and communities.

In many parts of BC's Interior, forest regeneration is no longer assured due to shifting climate conditions. For instance, BCTS and corporate TFL holders were responsible for extensive logging in the Kettle Valley, which many forestry professionals believe contributed directly to the catastrophic flooding of Grand Forks in 2018. This case highlights the consequences of failing to manage forests with climate resilience in mind. A Forest Practices Board complaint on logging in the Kettle Valley raises further concerns about inadequate practices in the region ([Did Licensees Meet Cutblock Size Rules in the Kettle River Watershed?](#)).

Anthony Britneff, a former ministry employee and senior professional forester, described the Ministry's practices—including those of BCTS—as doing "irreversible harm to the environment and to British Columbians" ([Sprawling clearcuts among reasons for B.C.'s monster spring floods](#)).

By failing to adapt its operations to align with best available science and climate realities, BCTS is undermining public interest and jeopardizing the future health and sustainability of BC's forests.

5. BCTS Professionals Operate Under a Flawed Professional Reliance Model with Weak Oversight

BCTS professionals, including foresters, engineers, geoscientists, biologists, agrologists, and science technologists, are governed under the Professional Reliance Act, a system that relies on self-regulation. In theory, this model is meant to ensure accountability, but in practice, it has significant shortcomings. For instance, BCTS refuses to disclose the names of professionals, such as foresters and hydrologists, responsible for approving specific cutblocks. This secrecy undermines the supposed cornerstones of the professional reliance model: transparency and accountability.

The professional reliance model has been widely criticized for creating conflicts of interest. Essentially, professionals are expected to police and report on their peers, with organizations like Forest Professionals BC (FPBC) responsible for disciplining foresters. This “fox guarding the henhouse” dynamic makes it nearly impossible to hold BCTS accountable for sustainability failures, whether province-wide or at the regional or district level. We are aware of complaints submitted to regulatory bodies like FPBC, Engineers and Geoscientists BC (EGBC), the Office of the Superintendent of Professional Governance (OSPG), and to former Minister of Forests Bruce Ralston which have not resulted in meaningful action.

SWLCS is also aware of cases where forestry professionals who have made complaints have been subject to reviews themselves and/or have faced punitive repercussions.

Although the BC NDP government promised a review of the professional reliance system when it was elected in 2017, its major outcome was the creation of the OSPG—a body that, based on SWLCS’s inquiries, lack the authority or effectiveness to address systemic issues. The professional reliance model remains a major roadblock to forestry reform, as it allows unsustainable practices to continue without adequate external oversight or consequences.

For further context, a 2017 article highlights the inadequacies of this system: [NDP orders review of government reliance on industry-hired experts](#).

6. BCTS Uses Outdated Information and Mapping Despite Better Information Being Available

The BC government has invested significant time and public funds into updating the Biogeoclimatic Ecosystem Classification (BEC) system, which categorizes the province's ecosystems based on climate, soil, and vegetation. In the Kootenay Boundary Region (KBR), the updated BEC version 12 has been publicly available since 2021 and is widely used by BCTS, the Ministry of Forests (MOF), and other licensees for most planning and operational purposes.

However, despite the 2002 Higher Level Plan Order (HLPO) mandating that BEC mapping be updated "as soon as practicable," BCTS, MOF, and other licensees continue to use outdated BEC versions for managing old and mature forest targets. This reliance on older BEC data reduces the number of ecosystems that must be considered and minimizes the appearance of non-compliance across most ecosystems. In the Kootenay Business Area, BCTS still relies on BEC version 3, which was last updated in 1995, to ensure minimum old and mature forest retention. Consequently, current forest management decisions are based on three-decade-old data.

Some Old Growth Management Areas (OGMAs) are within provincial and federal parks and protected areas that are outside the timber harvesting land base. Many of these OGMA areas do not necessarily represent actual old-growth forests, nor are they even intended to protect the most vulnerable, high-productivity ecosystems. When the original retention targets were set, it was assumed—though never verified—that at least 12% of old and mature forest targets were already met within parks and protected areas. By continuing to designate OGMAs in these locations, the same old/mature forest areas are effectively being double counted.

This reliance on outdated mapping and questionable OGMA designations undermines professional reliance, as forest professionals are mandated to use the best available information to uphold the public interest. As a government entity, BCTS should be applying the most current and accurate ecosystem classifications published by government staff to responsibly manage Crown lands. Notably, both the former BC Chief Forester (Diane Nicholls) and the current Deputy Chief Forester (Albert Nussbaum) directed MOF and BCTS to adopt updated BEC versions in the latest Timber Supply Review (TSR) determinations for the Arrow and Kootenay Lake Timber Supply Areas (TSAs).

Additionally, BCTS has collaborated with MOF in manipulating OGMA boundaries to prioritize timber extraction in the oldest and highest productivity stands. In many parts of BC, OGMAs are designated as "aspatial," meaning their locations can be adjusted or replaced over time, enabling the progressive logging of valuable old growth stands. This aspatial flexibility is a policy loophole rather than a genuine conservation strategy. In practice, most OGMAs do not contain old-growth forests, while many valuable old-growth stands remain unprotected outside of these designated areas (MacKillop et al. 2018; Wahn et al. 2024).

Environmental advocacy groups and forestry watchdogs have consistently raised concerns about the inadequate protection provided by OGMAs ([Canadian Parks and Wilderness Society](#)). Moreover, MOF maintains a restricted-access mapping database of historical OGMA designations, preventing external review of past alterations. This opacity likely conceals changes made by BCTS that favor timber extraction at the expense of old-growth forest conservation.

7. Narrow BC Government Parameters for Review of BCTS (announced on January 15, 2025) Fails to Address Systemic Issues

The proposed review appears to exclude all other values besides status quo, short term economic interests. “The Provincial Forestry Forum, a group that brings together all interests in the forestry sector, including contractors, value-added manufacturers, industry and labour” is intended to “provide recommendations about how BCTS can:

- create forestry-sector growth, competition and diversification;
- provide predictable and reliable market access to fibre;
- diversify access to fibre for the manufacturing sector, including value-added facilities;
- strengthen partnerships with First Nations and communities;
- provide more jobs for contractors, workers and communities; and
- lead in innovative, sustainable forest management and silviculture practices.”

There is nothing in the parameters or structure of this review to give First Nations or the public any confidence that their objectives and concerns are being considered or that the needed reform of BCTS is being taken seriously ([Province launches BC Timber Sales Review](#)). [Black Press: B.C. Timber Sales review heavy on economics, light on environment](#)

Environmental Mismanagement – Past, current and projected future BCTS operations are not sustainable and continue to cause direct and cumulative ecological impacts.

8. The BCTS Approach to Aging Cutblocks Raises Serious Concerns

BCTS has come under scrutiny for the way it defines and ages cutblocks. BCTS instructs its staff to (a) consider “remnant” old growth deferral areas (OGDAs) as mapped by the Technical Advisory Panel (TAP) for field verification and retention only if confirmed, and (b) assume “ancient” and “big-treed” OGDAs are available for harvest ([Guidance on BCTS Implementation of Technical Advisory Panel \(TAP\)](#)). Reports from forest industry professionals across the province indicate that BCTS frequently logs trees that meet the definition of old growth, while labeling these cutblocks as younger. Additionally, BCTS is said to underestimate the age of forest stands, a claim corroborated by SWLCS’s on-the-ground observations.

Many proposed 2024-25 fiscal year BCTS cutblocks in the West Kootenays contain trees that qualify as definition old growth, yet BCTS continues to classify and propose these blocks for logging under using questionable age assessments. Specific examples include:

- **Castlegar/Cai Creek (TA2185-3):** This highly controversial proposed low elevation cutblock features many old growth trees which have survived wildfires within a kilometer of Castlegar. Lower Cai was mapped as an “intact watershed” by the TAP, and it has many other significant ecological values. This include the largest Ponderosa pine

tree in BC, at least three western white pine trees that rank within the top ten in BC, and other Ponderosa pine within the top 20, according to the BC Big Tree Registry. An accessible recreational trail winds its way through these record-sized trees and vital elk winter range. The original BCTS public fact sheet claimed that “none of the 3 cut blocks contain trees that meet Old Growth age criteria, within the area scheduled for harvesting,” but this sheet was revised when the error was brought to their attention. This cutblock is the subject of current BCFPB and FPBC complaints. See SWLCS’s comprehensive feedback on TA2185-3 as drafted by our lawyer:

<https://savewhatsleft.ca/cai-creek%2Fcastlegar>.

- **Ymir/Oscar Creek (TA1472-2):** This higher elevation cutblock contains hundreds of massive old growth trees of diverse species, ranging up to >700 years of age, based on tree cores. BCTS fails to acknowledge it is highly productive old growth forest used by Northern Goshawks, and that **this type of ecosystem (BEC variety) within the Stagleap landscape unit is already deficient in old growth. OGMA area set aside for old forest retention, as per BCTS’s FSP commitment.** This block is the subject of a current Forest Practices Board complaint against BCTS as noted on the BCFPB website: “Three professional biologists are concerned that: 1) logging of two cutblocks at Oscar Creek will cause harm to breeding goshawks, and 2) there is a systematic failure to manage old growth in the region in accordance with legal requirements and the Kootenay Boundary Land Use” ([BCFP Current Complaints](#)).
- **Kaslo/Robb Creek (TA2348-2):** The proposed cutblock initially included hundreds of indisputable old-growth trees. Most of the largest trees have been excluded from the revised cutblock boundaries, but BCTS proposes to log right up to rare old growth forest all along the southern block boundary. This forest is exceedingly rare in this landscape unit, and satellite imagery confirms the lack of remaining primary forest in this Kaslo to New Denver corridor, a region heavily logged by BCTS. Other proposed cutblocks target a known critical wildlife corridor between Kokanee and Goat Range Provincial Parks. Within this corridor, as many as 17 BCTS cutblocks are in some stage of development (<https://savewhatsleft.ca/robb-creek%2Fkaslo>).
- **Bonnington/Sproule Creek (SMA034 etc):** This area has been extensively logged over the past two decades, leaving little primary forest intact. BCTS justified its overharvesting based on the objective of addressing pine and fir beetle infestations, but it has provided no transparency or answers to questions from the public about this. This watershed, located just 8 km from Nelson, serves as a recreational hub and contains significant densities of veteran wildfire-surviving trees. BCTS ages block SMA034 at 94 years old, yet there are plenty of fire-surviving old growth trees (140+ years old) in this proposed block. (<https://savewhatsleft.ca/sproule-creek%2Fnelson>).
- **Slocan Park (All Four Blocks, Particularly TA2335-2):** This area is a critical wildlife corridor and an important ungulate winter range. Block TA2335-2 includes the 27th-largest Ponderosa pine on record, which SWLCS submitted to the UBC Big Tree Registry. Despite its significance, this tree was included in the official timber cruise data for sale volume. The planned clearcuts, combined with recent past clearcuts will span about 7 kilometers by 350 meters above Slocan Park’s residential area. Half of the corridor was logged in 2014-15 and replanted with highly flammable pine and fir, creating a wildfire-

prone landscape. These blocks are prime winter ungulate range. Resident elk using this long, narrow corridor will have no other option but to use a new or replanted 10-year-old clearcut (<https://savewhatleft.ca/slocan-park>).

These proposed cutblocks demonstrate how BCTS prioritizes timber extraction over ecological, biodiversity, and community considerations. BCTS planning and practices not only threaten biodiversity but also amplify risks like wildfire and watershed degradation, especially in areas already heavily logged.

The cutblock examples are all from the Kootenays, but similar situations are repeated throughout BC. A list of BCTS controversial logging hotspots can be found at: <https://savewhatleft.ca/around-the-province>.

9. BCTS Fails to Differentiate Between Primary and Previously Logged Forests

BCTS does not differentiate between primary forests—those that have experienced minimal human disturbance—and previously logged forests. This disregard runs counter to ecological theory recognizing the vastly different ecological functions and values provided by primary forests compared with managed and/or replanted forests.

Primary forests are irreplaceable ecosystems, offering superior biodiversity, habitat complexity, and ecological stability. They contribute to critical processes such as carbon sequestration, soil formation, and water cycle regulation. In contrast, previously logged forests often suffer from diminished soil depth, compaction, reduced nutrient availability, reduced habitat complexity, and altered hydrology, resembling tree farms more than natural ecosystems.

When SWLCS directly questioned BCTS on whether a specific area targeted for logging was primary forest, the response, received on May 10, 2024, was evasive: “Your request to provide a figure that will approximate the area of BCTS developments within primary versus secondary forest is not supported. Deriving such a number would take significant time and would not provide meaningful context as to how, when, where or why this harvesting occurred.” This refusal to even assess or acknowledge the distinction highlights a significant accountability gap. By treating all forests as equal, BCTS ignores the fundamental ecological value of primary forests, undermining sustainable forestry practices and contributing to the loss of biodiversity and resilience in BC's ecosystems.

Globally, primary forests are vanishing at an alarming rate, and BC's intact forests represent a critical piece of the planet's dwindling natural heritage. Recognizing this, many regions have adopted stricter measures to preserve primary forests. For instance, the EU Biodiversity Strategy explicitly mandates member states to protect remaining primary and old-growth forests as part of climate resilience efforts.

Primary forests act as vital reservoirs of biodiversity, hosting species that cannot thrive in secondary forests or tree farms. They also provide natural defenses against flooding and

landslides by maintaining soil stability and water absorption rates—functions diminished in previously logged areas. Higher wind speeds increase convection effects, which in turn expose bare soil to more solar radiation, reducing evapotranspiration and ultimately decreasing critical precipitation.

Additionally, primary forests often have significant cultural importance to Indigenous communities who rely on them for traditional practices and food security.

Many species are primary forest dependent and some examples include Woodland Caribou, Fisher, Northern Myotis, Silver-haired Bat, Northern Flying Squirrel, Northern Goshawk, Winter Wren, Pileated Woodpecker, Marbled Murrelet, Spotted Owl, Boreal Owl, Northern Pygmy-Owl, Red-backed Vole, Clouded Salamander, as well as several [saprophytic plants](#), mosses, lichens, liverworts, algae, and bacteria.

BCTS's reluctance to differentiate between primary and secondary forests reflects a broader lack of transparency in BC's forestry management. Examples include BC's lack of endangered species legislation (originally promised by the BC NDP in the 2017 election but never enacted) and the BC NDP's Draft Biodiversity and Ecosystem Health Framework (announced with great fanfare in November 2023 without any further mention after the fall 2024 election).

10. BCTS Plans to Nearly Double Harvest Volumes, Justified Under the Guise of “Wildfire Mitigation” and “Salvage Logging”

BCTS projects nearly doubling their harvest volume over the next few years under the scientifically questionable guise of wildfire mitigation and post-disturbance logging (often called “salvage” logging by government and industry, although nothing is being “saved,” as implied). Forest science research findings directly challenge BCTS/MOF's outdated ideologies around these practices.

Post-disturbance logging typically followed by replanting often exacerbates ecological impacts (i.e., loss of soil, cover and biodiversity, erosion, sedimentation, terrain instability, landslides, altered hydrology, delayed recovery, etc.) rather than mitigating ecological damage. Resulting simplified tree plantations are much more susceptible to reburns and lack the ecological functions of primary forests. Studies confirm that leaving post-disturbance areas intact better preserves their biodiversity and carbon stores, while stabilizing soils, and speeding up natural recovery.

Despite this, BCTS's current business plan estimates the volume of wood harvested will increase from 4.4 million m³ in 2022–2023 to 8.5 million m³ by 2025–2026, with post-disturbance logging being a significant contributor to this spike. This unsustainable increase is outlined in the [BCTS Business Plan 2023-2024 to 2025-2026](#).

Wildfire, wildlife, soil, hydrology, carbon and other subject experts have reviewed the negative consequences of post-disturbance harvesting (DellaSala 2008; Lindenmeyer et al. 2012;

DellaSala and Hanson 2024). The latter have been recently summarised in a webinar ([Gaming the System - The Truth About Salvage Logging](#)) in the context of BC forests.

A November 28, 2024 article in Spar Tree Group (Third Quarter Update – BC’s Timber Harvest) outlines how BCTS harvesting has ramped up in most of the province (except the North) and how more of the whole tree harvest is being pulped: “With sawmills reducing production or outright closing, there are fewer residual chips being produced, increasing the pulp sector’s reliance on logs directly from the woods.”

By promoting practices based on outdated science and questionable justifications, BCTS not only fails to align with modernized forest management principles, but it also jeopardizes ecological and economic sustainability.

(Note: More could be added to this section.)

11. BCTS Practices (e.g., Clearcutting, Salvage and Replanting, Glyphosate Application) Exacerbate Wildfire Risks

BCTS’s logging practices (e.g. clearcutting, salvage, replanting, suppressing or killing deciduous trees through mechanical brushing or aerial glyphosate spraying) significantly increase uniformity of dense, single-aged conifer stands linked to catastrophic, fast-moving wildfires. Numerous scientific studies demonstrate that wildfire risk is heightened for 30 to 40 years following clearcut logging due to reduced biodiversity, drier microclimates, and uniform fuel loads. To be fair, there are also studies of 25 to 40-year-old stands in the Interior showing resistance to wildfire that were broadcast burned before planting. More research is needed.

The long term economic and ecological costs of wildfires far outweigh the short-term economic benefits that BCTS logging contributes. In 2023 alone, the BC government spent over \$1 billion on wildfire suppression, with additional losses in property, infrastructure, and human health costs compounding this figure. Given the scale of these impacts, a compelling case could be made for transforming BCTS’s practices to mitigate their contribution to BC’s escalating wildfire crisis.

For further insights, here are several resources:

- Canada's Logging Industry Is Seeking a Wildfire 'Hero' Narrative: [Vancouver Is Awesome](#)
- Out of Control: A Growing Area of High-Hazard Clearcuts and Plantations is Fuelling BC's Raging Forest Infernos: [Focus on Victoria](#)
- Wildfires and Old Growth: Facts vs. Fiction by Rachel Holt: [Wildfires and Old Growth: Facts vs. Fiction](#)
- Most of BC's 2023 Wildfires Burned in a Small Area of BC Subject to Intense Industrial Development: [Evergreen Alliance](#)
- Fire/Drought Letter to the Editor by Lawyer Danica Djordjevich: [Vernon Morning Star](#)

- To Fight Wildfire, Our Forests Need to Grow Old: [Politico](#)

12. BCTS Relies on Flawed International Sustainability Standards

BCTS justifies its sustainability claims using the third-party Sustainable Forestry Initiative (SFI) certification scheme. SFI is an industry-led, international certification program that has been widely criticized for its inadequate environmental oversight. Relying on this flawed standard while outsourcing responsibility for sustainability claims is unacceptable for a provincial government agency tasked with managing BC's forests responsibly. The importance of sustainability certification schemes, including SFI, in marketing Canadian forestry products abroad can't be overstated and is widely recognized by government and industry as a key marketing pillar.

In December 2022, Ecojustice, on behalf of Greenpeace Canada, Wildlands League, the 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 against SFI ([Ecojustice announcement](#)). They alleged that SFI's "sustainable" logging certification is both "misleading" and "false." The Competition Bureau of Canada is currently investigating these claims of greenwashing.

Adding to the controversy, SFI's board includes John Kayne, CEO of Canfor, and David Graham, the President of Weyerhaeuser ([SFI Board Members](#)), some of the largest and most environmentally damaging forestry corporations.

SFI has been criticized for these key weaknesses in its certification program:

- Lack of clear sustainability definition: SFI does not provide a precise definition of "sustainability" within its standards, leading to ambiguity in its application.
- Permissive logging practices: The certification allows practices such as clearcutting, the use of toxic chemicals, and logging in habitats of threatened species, including old-growth forests providing critical habitat for federally endangered caribou.
- Absence of on-the-ground assessments: SFI's certification process lacks mandatory field evaluations to verify its undefined sustainable practices, relying instead on discretionary processes without ensuring actual sustainability outcomes.
- Industry influence: As an industry-backed organization, SFI's standards have been criticized for favoring business interests over environmental protection, potentially compromising the credibility of its sustainability claims.

BCTS's 2023 Annual Performance Report leans heavily on SFI certification to support its sustainability claims. The report ambiguously defines sustainable forest management as maintaining environmental, economic, and social values "over the long term." It further asserts that because 100% of BCTS timber volume is SFI-certified, it demonstrates "sound forest management practices."

This reasoning raises significant concerns and when asked directly whether BCTS's harvesting practices are sustainable, BCTS's RPF and Director of Sustainability and Forestry, Len Stratton, replied:

"Yes, BCTS manages 100% of its timber volume under the Sustainable Forestry Initiative (SFI) Forest Management certification standard and is harvesting at sustainable rates. Our commitment to sustainably managed forests can be found in our BCTS Business Plan and Sustainable Forest Management Plan on the BCTS public website. BCTS is also an active member of the Western Canada SFI Implementation Committee" (April 24, 2024).

This in-depth Reuters investigation from September 2024 highlights how certification schemes like SFI enable unsustainable logging ([‘Sustainable’ logging operations are clear-cutting Canada’s climate-fighting forests](#)).

Further evidence of BCTS integration with SFI can be found in an ambiguous August 2024 document entitled: [BCTS Sustainable Forestry Initiative \(SFI\) Client General Awareness Document](#). Note the BCTS logo alongside SFI's logo as further evidence of the BC government in lockstep with this highly questionable group. This 2024 article revealed that "out of 543 audits of SFI-certified companies since 2004, none acknowledged major issues such as soil erosion, clearcutting, water quality, or chemical use, suggesting a lack of accountability within the certification process" ([Greenwashing claims made against major forest certification organization](#)). There are no documented cases online of SFI ever suspending a certificate in its history.

Reliance on SFI certification sidesteps addressing ecological and climate concerns. SFI fails to provide the transparency, accountability, and robust environmental checks necessary to ensure truly sustainable forestry practices.

13. BCTS Historically and Currently Focuses Solely on Timber Extraction

BCTS has consistently prioritized timber extraction above other ecological, cultural, and social values. This narrow focus has resulted in the ongoing degradation of representative ecosystems and associated values. BCTS holds the dubious record for the highest rates of non-compliance during BC Forest Practices Board audits and is also the most frequent target for complaint investigations. Despite public and expert calls for reform, BCTS continues to disregard critical environmental and community concerns. There are numerous documented examples of BCTS's operations ignoring or undermining the expressed interests of local First Nations including:

- Neglect of First Nations' Rights and Stewardship Obligations: BCTS frequently proceeds with forest developments without securing Indigenous consent or integrating Indigenous knowledge, thereby violating reconciliation principles and UNDRIP commitments.

- Riparian Areas: BCTS operations harm riparian zones, leading to erosion, sedimentation, altered hydrology, and degraded fish habitats.
- Community Watersheds and Aquifers: Clearcutting and road building in community watersheds compromise water quality/quantity, retention, and flood control, threatening health and safety.
- Biodiversity and Species at Risk: BCTS logging impacts documented wildlife breeding, roosting and overwintering habitats for listed species (e.g. Woodland Caribou, Northern Goshawk, Fisher, Silver-haired Bat Grizzly Bear, Western Screech-Owl, Flammulated Owl, Williamson's Sapsucker, etc.), thereby accelerating biodiversity loss, and contributing to species at risk extinction.
- Cultural Heritage Resources: BCTS disrupts sacred sites, culturally modified trees, and traditional hunting and harvesting areas, disregarding First Nations' cultural heritage.
- Recreational Resources: Logging in high-value recreational areas fragments these areas, diminishing their visual quality, wildlife and other ecological values, while reducing public access.
- Trapping and Grazing Rights: Forestry activities disrupt trapping and grazing areas, undermining their productivity and cultural significance.

(NOTES: Add section about BCTS & MOF knowing for the decades they were systematically fragmenting and logging caribou habitat, resulting in the South Selkirk and South Purcell herds of mountain caribou being functionally extirpated, despite caribou transplants, maternity penning, and millions spent on culling thousands of wolves and cougars since 2015. From Wildsight: 3101km² of critical caribou habitat was logged between 2007 and 2023, and 513km² of critical core habitat in the same period.)

Structural and Policy-Driven Issues

14. Reforming BCTS Tenure Areas is Simpler Than Corporate TFLs, Making It a Practical Target for Change

Reforming or removing Tree Farm License (TFL) tenure for corporations is more complex than it would be for BCTS operating areas. If conserving the last unprotected primary forests is the priority, then focusing on BCTS managed land offers the simplest and most achievable path. Proposals to buyout agreements with TFL holders would incur enormous and perhaps insurmountable costs, whereas immediate legislative changes on BCTS managed lands could efficiently protect endangered species, habitats, and watersheds while mandating a gradual transition away from clearcut logging. Simple legal reforms—such as making the logging of legally defined old growth forests illegal—would eliminate ambiguity and streamline enforcement. Public support is overwhelming: a 2019 Sierra Club survey found that 92% of

British Columbians favor action to protect old-growth forests ([Sierra Club BC](#)).

15. BCTS Failure to Implement Landscape-Level Planning Effectively

BCTS has stated as recently as March 2024 (in a meeting with SWLCS in Castlegar BC) 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. The BC government states: “Forest Landscape Plans will be initiated where and when they are needed, prioritized by the Province, in consultation with First Nations, and eventually put in place across the whole province” ([MOF Forest Landscape Plans FAQ](#)). The BC NDP touts “forest landscape planning” as the future of ecologically-sound forestry in the province yet progress on such plans have been slow since the government published the bulletin stating this in March 2022. SWLCS has had dialogue with six forestry professionals who have expressed that implementation of province-wide forest landscape level plans is estimated to take at least ten more years, by which time all accessible (economically viable) primary forest in the province will have been logged.

(Notes: Add compelling facts to this point)

16. BCTS and the BC NDP Back-Tracked on Halting Old-Growth Logging

In 2021, the government announced that BCTS would cease logging old growth in its operating areas. In May of 2023, BCTS/MOF quietly released a brief memo that reversed their promises to stop logging old growth ([Guidance on BCTS Implementation of Technical Advisory Panel \(TAP\)](#)).

This simple document outlined a major policy shift that BCTS/MOF/BC NDP knew would be controversial, despite 2019 polling suggesting that the overwhelming majority of the BC population opposes 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 proposed by BCTS, such as the incredibly rare, huge Interior rainforest trees in the Dome Creek/Walker Valley area. In the Strait of Georgia timber sales area alone, BCTS is planning to log ten old growth areas totalling 1,452 acres with a volume equivalent to almost 9,000 logging trucks of old growth in the current fiscal year (2024-25). This information comes directly from their publicly available sales schedule, summarised in the table below.

BC Timber Sales - Old Growth Logging 2024-25 fiscal sales schedule					
Strait of Georgia Operating Area Only					
TSL	Geographic Location	Hectares	Acres	Cubic Meters	Log Trucks at 40m3/Truck
TA0517	Jacklah Creek	88.7	219.2	57,015	1,425
TA1758	Burman	170.8	422.1	70,502	1,763
TA1079	Lukwa Fickle	40.4	99.8	31,673	792
TA1884	Kalnum	54.4	134.4	32,186	805
TA0911	Elliot	28.2	69.7	27,682	692
TA1430	Tahsish	65.6	162.1	41,440	1,036
TA1622	Fannin Creek	42.2	104.3	39,209	980
TA2378	Upper Taylor	26.3	65.0	19,727	493
A95450	Nahmint	29.9	73.9	21,340	534
TA2381	Nahmint	41.5	102.5	19,134	478
	TOTAL	588.0	1453.0	359,908	8,998

2025-26 sales schedule information is now available which shows considerable old growth forest on the schedule.

BCTS refuses to answer questions about where it is logging old growth in their 2024-25 sales schedule, despite being a government licensee employing forest professionals with an ethical requirement to serve the public interest. BCTS has stalled for more than five months (as of February 4, 2025) in responding to an FOI request although this information must be readily available (and is publicly available for the Georgia Strait BCTS business area). In May of 2024, leaked government mapping data revealed that “ministry bureaucrats have rejected more than half of the proposals made by the TAP to defer logging of some of the biggest and best remaining old growth stands in the province, a move that clearly favors the logging companies that the ministry regulates” ([Leaked data reveals new threat to BC’s old growth forests](#)). BCTS is complicit in this.

BCTS implementation of the BC government’s Technical Advisory Panel (TAP) Priority Old Growth Deferrals has been deemed by most as very poor. Despite over three years passing since the TAP made its deferral recommendations to the province to protect BC’s most at risk old forests, provincial databases remain inaccurate in their accounting of what is left ([OG TAP Old Growth Deferral: Background and Technical Appendices](#)).

17. BCTS Prioritizes Industry Stakeholders and Excludes Broader Public and Environmental Values

A key tenet in BCTS’s current business plan is to “continue to actively engage and collaborate with key customer and supplier stakeholders.” These communications exclude other considerations beyond timber extraction. BCTS collaboration is ongoing with the Timber Sales Advisory Council (TSAC), a group made up of industry lobbyists. The groups represented in the TSAC are: Truck Loggers Association, Independent Wood Processors Association, Interior Lumber Manufacture’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. The TSAC membership includes three BCTS staff at the top of the list: [Timber Sales Advisory Council Membership](#).

18. BCTS's Auction-Based Pricing Model Undermines the Value of BC Timber

The BCTS auction-based pricing model plays a critical role in setting the province's benchmark timber prices. The BC government relies on BCTS auction results to justify to the United States that its forestry industry operates without subsidies, aiming to counter accusations of dumping lumber on US markets at artificially low prices. However, as of 2025, the same log sells for nearly twice as much in Washington state as it does in British Columbia. This stark price discrepancy and the fact that the Ministry of Forests historically operates with minimal profit, suggests that BC's stumpage fees are undervalued. This deprives the provincial government of fair compensation and raises concerns about the competitiveness and sustainability of BC's timber pricing system.

BCTS has played an integral role in keeping lumber prices artificially low for the past two decades while facilitating unsustainable deforestation. The vast majority of BC's timber is exported—an estimated 85%, according to the BC Lumber Trade Council. Much of this exported timber has little or no added value, and as big BC mills shut down across the province, raw log exports continue to rise ([BC Lumber Trade Council; Spar Tree Group, Third Quarter Update – BC's Timber Harvest, Nov 2024](#)).

BCTS sales are not fully representative of BC's timber market. BCTS only controls 20% of the provincial timber supply, while most BC timber is harvested under long-term tenure agreements. These tenure agreements are not competitive or transparent and enable timber sales at pricing that is far lower than possible in the US.

There have been anecdotal reports of companies strategically bidding to influence future stumpage costs and colluding with competitors to artificially lower pricing. And finally, many large tenure holders (e.g., major logging companies) do not participate in BCTS auctions, meaning that BCTS sales alone do not reflect the broader timber economy in BC.

19. BCTS Has Failed to Promote Value-Added Market Sales in Its 21-Year History

Despite professing a commitment to increasing value-added market sales (now designated as Category 4, previously Category 2), BCTS has accomplished little in this area over its 21-year history. The organization has consistently failed to implement meaningful initiatives, such as

tiered pricing models tied to job creation or other measures that could benefit smaller, local businesses.

In the 2022–23 fiscal year, BCTS fell short of its modest Category 2 target of 650,000 m³, achieving only 570,000 m³. This failure represents a broader inability to nurture smaller, minimally tenured, or untenured processing facilities that typically create more value-added jobs and contribute more to local communities than multinational corporations.

The newly rebranded Category 4 aims to offer timber harvest opportunities to promote the manufacturing of value-added products such as mass timber, engineered wood, plywood, posts, poles, mouldings, and flooring. However, the implementation plan remains vague, offering no clear explanation of how BCTS intends to expand or support this sector effectively.

Without substantial changes to its approach, BCTS risks perpetuating the status quo, benefiting multinational forestry corporations at the expense of local economic and environmental sustainability.

Sources: [BCTS Annual Performance Report 2023](#) [BCTS Category 4 Overview](#)

Socioeconomic and Community Impact

20. Public Pressure on BCTS Could Trigger Broader Forestry Reforms

Reforms to BCTS mean reforms to the Ministry of Forests. Sustained public pressure on BCTS has the potential to force meaningful concessions, which would almost certainly extend beyond BCTS itself to broader forestry practices throughout the province.

A precedent for change due to public pressure was set in 2020–21, during the Fairy Creek protests—the largest act of civil disobedience in BC’s history. In response, the government announced temporary deferrals on old-growth logging, and four years later, the Fairy Creek deferral appears to be transitioning to permanent protections. Unfortunately, implementation of “voluntary deferrals” is inconsistent and confined only to areas of the province where First Nations were able to unanimously support them.

(Note: Need to work on this point to explain current status of deferrals. Add facts about the government going to start compensating logging companies after 4 years.)

21. BCTS is Complicit in Divisive Policies Involving Old-Growth Logging and First Nations

Old growth logging deferrals were first announced in September 2020, just prior to the last provincial election, and the manner in which this policy decision was implemented put disproportionate pressure on First Nations. We know that deferral decisions implemented by BCTS in their operating areas have had the obvious effect of sowing divisions within and

between Nations. Nations were given an impossible time frame in which to respond to the question of whether to defer or not defer, and were not offered capacity funding to assist them with their deliberations. Initially, the government offered Nations no conservation funding at all to offset income from logging old growth. Conservation funding continues to be limited, haphazard, and contingent on 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 conclude that the BC NDP approach to deferral implementation was orchestrated to absolve government of making the hard decisions themselves, via legislated changes and permanent protections.

One of the most obvious advantages of dismantling BCTS would be that First Nations could absorb the 20% of the Annual Allowable Cut (AAC) that BCTS currently manages, fulfilling BC's previously stated and much delayed commitment to increase First Nations tenure apportionment to 20%. Indeed, several First Nations have requested that very transfer.

(Note: This section needs additional work.)

22. BCTS Frequently Logs in Areas Where Local Residents Oppose Logging

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 (SWLCS meeting with BCTS March 2024). Logging these areas comes with further heightened risks of wildfire, flooding, drought, damage to precious watersheds, devaluation of neighbouring private property, and loss of recreational values. BCTS tenures support a disproportionate share of contentious areas and a purely economic argument could be made regarding the lack of viability of BCTS operations.

(Notes: Need further references and work.)

23. BCTS Exaggerates its Contributions to the Economy and Job Creation

BCTS claims to be a significant contributor to the economy and job creation, but the evidence suggests otherwise, especially considering the broader impacts of forest mismanagement in a changing climate. In the 2023-2024 fiscal year, BCTS is only projected to make a profit of \$37.5 million—equating to just \$6.79 in tax revenue for every person in BC. Meanwhile, silviculture (tree planting) spending for that year is expected to be \$72.9 million. When factoring in the extensive subsidies the forestry industry receives, the high degree of mechanization, and the increasing costs associated with wildfires, floods, and the damage to watersheds and recreational areas, it becomes clear that BCTS is not providing significant financial benefit to BC. Forestry accounts for only 1.6-1.9% of jobs province-wide, a share that is steadily declining.

While SWLCS acknowledges the importance of these high-paying jobs in rural communities, transitioning away from clearcutting, developing more value-added local mills, and strengthening environmental protections in the Forests Act would create more sustainable jobs over time and increase the number of jobs per cubic meter.

(Note: Need more stats about industry subsidies. Need data on other subsidies beyond FESCBC amounting to about \$400 million annually. Make compelling case that MOF is only marginally profitable even when wildfire mitigation expenses are removed from the MOF budget. Use David Broadlands article to find sources. [Forestry doesn't pay the bills, folks](#))

24. BCTS Areas Need Inclusion in the 30x30 Conservation Target to Prevent Low-Value Land from Being Over-Represented

To meet the goal of protecting 30% of BC's land by 2030, some of BCTS's operating areas must be included in conservation efforts. Without this inclusion, we risk seeing vast areas of low ecological value, such as ice and rock, disproportionately accounted for in protected areas. At a minimum, old-growth forests, watersheds, and front-country areas within BCTS operating areas should be protected, as these are the priorities for rural BC residents. Furthermore, the remaining small patches of accessible primary forests (those that have never been logged, whether old growth or not) should be safeguarded, given the ongoing ecological crisis. Rural communities should have a say in what lands are designated for protection.

In conclusion, BCTS is the most conspicuous example of poor practices and solvable problems within the BC forest industry. SWLCS believes conclusively that BCTS games the system, with intention, both covertly and brazenly, and that by targeting BCTS for reform or replacement, much needed changes and improvements will follow throughout the forestry industry.

Save What's Left Conservation Society