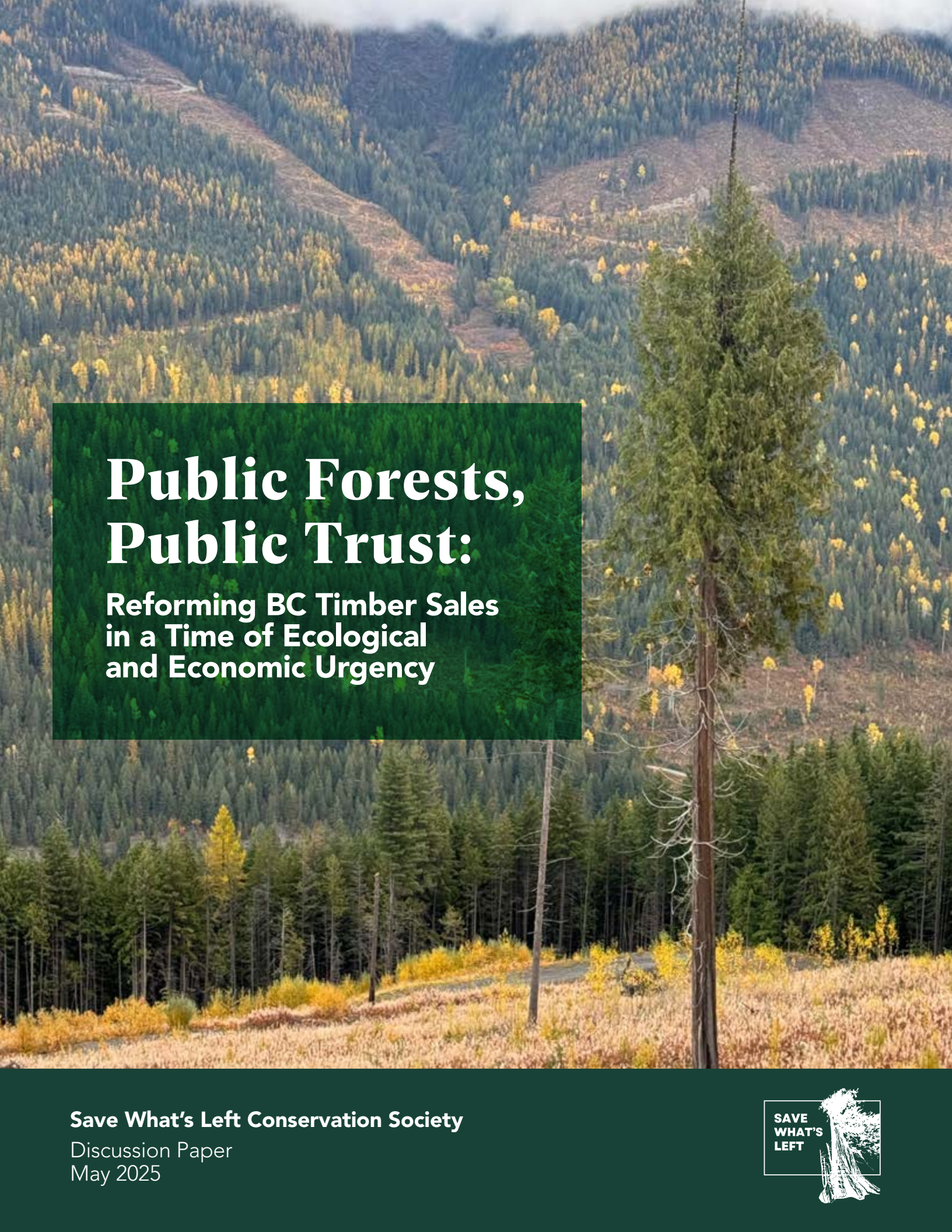




# Public Forests, Public Trust:

Reforming BC Timber Sales  
in a Time of Ecological  
and Economic Urgency

**Save What's Left Conservation Society**

Discussion Paper  
May 2025

SAVE  
WHAT'S  
LEFT





Credit: Joshua Wright.  
Cover photo: SWL.

# Foreword

**Let us make no mistake: our claims at “management” of any part of Nature are a hoax.**

To manage anything sustainably, we need an inventory of everything being managed, and a blueprint of how everything in that inventory is connected. In any BC forest, how much of an inventory do we really have? Harvard’s E.O. Wilson showed that we’ve identified only a tiny fraction of Earth’s biodiversity—especially in soil. We’ve declared war on the most numerous and important group of animals on Earth—insects—and we remain largely ignorant of the microorganisms that make soil fertile. Suzanne Simard’s work reveals astonishing underground relationships in forests that science is only beginning to understand.

Still, we proceed with “management” as though we have the blueprint in hand.

Let’s remember the parable of the goose that laid golden eggs. When its owner got greedy and killed the goose to get more eggs, it turned out to be just a goose. Our forests are the goose. Sustainable jobs in timber, pulp, recreation, water, and climate resilience are the golden eggs. Yet we continue to destroy the source, and we demand even more from less. Governments should be protecting the goose—not auctioning it off!

This mindset of entitlement has deep roots. For most of our existence, humans lived as part of Nature, recognizing that we are but one strand in a vast web of relationships. But with the rise of the anthropocentric worldview, we came to see ourselves above Nature,

not within it. The legal, political, and economic systems we’ve built are reflections of that dangerous delusion.

Today, scientists warn of a mega-extinction crisis, with a million species on the brink. And yet, even with wildfires, floods, and atmospheric breakdown accelerating, we continue to log the last of our natural, primary forests. Consider the collapse of caribou herds across Canada. These animals require old growth forests to live. But instead of halting the logging that fragments their habitat, we blame wolves—and shoot them from helicopters.

We always look for a scapegoat that isn’t us. This refusal to take responsibility is the essence of the problem. We are simply too ignorant and unwilling to live on the interest of Nature’s productivity. Instead, we are killing the goose by destroying the intact, vibrant, primary forests for short term profit.

We are out of time. We must stop killing the goose. That means no more logging of primary forests—anywhere. It means creating jobs for forest protectors, and handing leadership to those with ecocentric vision, including Indigenous communities who have never forgotten that we are part of Nature, not apart from it.

This paper both outlines the myriad of problems with how BC Timber Sales operates and presents a new path forward. What we need now is courage by leaders to walk that path.

**Save What’s Left.**

**— David Suzuki,**  
**Grandfather**



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# Executive Summary

**British Columbia's public forests are under growing pressure—from climate change, biodiversity loss, and declining social license for industrial-scale logging. At the centre of this tension is BC Timber Sales (BCTS), the provincial government's own logging agency, which is the single largest logging entity both in terms of area and volume in the province.**

BCTS was created to promote market access and fair pricing for timber, but over the past two decades, it has evolved into something else: a volume-driven, economically questionable, minimally accountable logging program with a mandate and model increasingly out of step with BC's stated commitments to sustainability, reconciliation, and climate action.

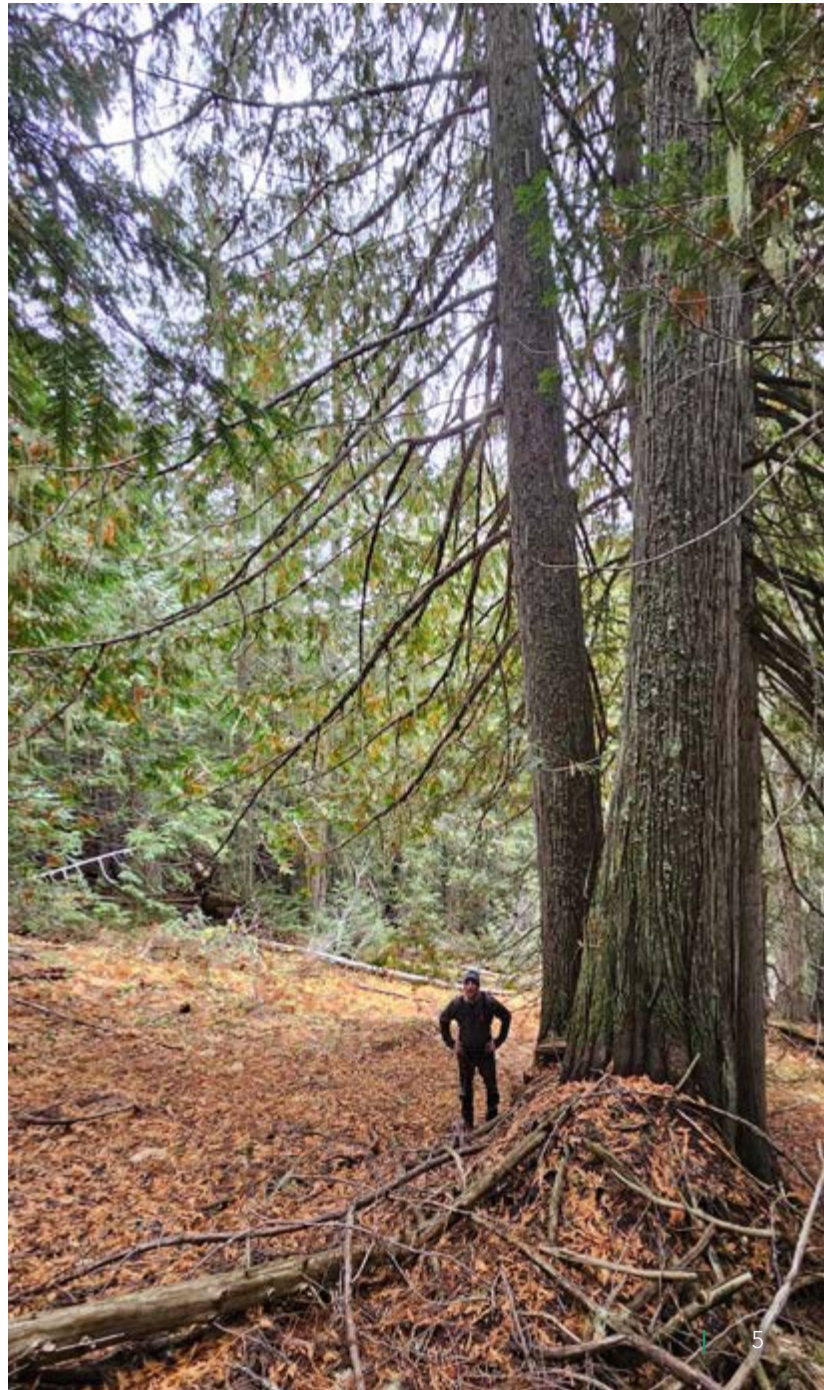
If we are serious about reforming forestry in BC, we must begin with the part of the system that government directly controls. As a public agency, BCTS should reflect the public interest. Yet it continues to log in many of the most ecologically sensitive and socially contentious areas of the province—including old-growth forests, community watersheds, and wildlife corridors—often without meaningful engagement with affected communities or First Nations.

This paper lays out 24 critical issues with BCTS governance, operations, and policy alignment, based on input from forestry professionals, field verification of active and proposed cutblocks, and discussions with workers and communities on the ground. It makes the case that reforming BCTS is not only a legal and ethical imperative—it's also the most practical starting point for meaningful change in BC forestry.

At a time when trust in forest governance is strained, reforming BCTS offers a unique opportunity to rebuild that trust—to demonstrate leadership, restore integrity to public forest management, and shift BC's forestry model from extraction to stewardship.

The path forward is clear. What remains is the political will to walk it. The BC Timber Sales division of the Ministry of Forests is not sustainable economically or environmentally at present. Change is needed now.

**We welcome dialogue with the BC Timber Sales review panel, the government, and all other parties interested in seeking a brighter future for our forests and forest industry.**



# Introduction



Minister of Forests Ravi Parmar with Minister of Health Josie Osborne at Franklin Forest Products in Port Alberni with what are likely to be old growth logs behind them, 2024.

Credit: Facebook.

## Reforming stewardship of public forest lands

**The BC Timber Sales division of the Ministry of Forests (BCTS) is not sustainable economically or environmentally.**

Reform of BCTS is a critical part of modernizing forestry in BC.

This modernization will ensure a sustainable industry for present and future generations—protecting and increasing the number of forest sector jobs, honouring our commitments to Indigenous Peoples under UNDRIP, and protecting what is left of the ecological values that British Columbians hold dear.

Reform of forestry in BC must begin with the government's own forestry division: BCTS. If the government is unwilling to lead by example, how can we expect positive change from the private sector?

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 change.

Since being re-elected in October 2024, the government tone on forestry has shifted measurably. Reflecting on this government's eight-year history of governance, the party has not delivered on a wide array of conservation promises, including:

- Failed to implement the Biodiversity and Ecosystem Health framework announced in 2023.
- Failed to enact the long-promised endangered species legislation first pledged in 2017.
- Made only marginal progress on most of the recommendations set out in the 2020 Old Growth Strategic Review, with measurable regression on some of the recommendations.
- Failed to implement commitments to end raw log exports.
- Reversed course on BC Timber Sales logging in old-growth forests (May 2023).
- No meaningful reforms following the 2019 review of Private Managed Forest Land logging.
- No regulatory changes phasing out herbicide spraying despite commitments in 2024 election platform.
- Made marginal progress toward protecting 30% of lands and waters by 2030.
- Made marginal progress on implementing any of the suggestions in the key government document from 2021 titled "Modernizing Forest Policy in BC."

Considering this list, conservation-minded professionals, the public, and environmental NGOs have good reason to be concerned. It is a fair expectation for these groups to play an important part in the dialogue around improving forestry in BC.

The Save What's Left Conservation Society (SWL) has prepared this discussion paper to drive change in BC's forestry sector, to ensure sustainable forests and a sustainable industry for future generations in the long term.

This analysis first originated from discussions with logging industry workers in the BC Interior, who shared their perspectives that BCTS is one of the worst offenders in managing its tenured land sustainably. This viewpoint was later confirmed by leading forestry professionals and experts. SWL's ground-truthing in BCTS harvested areas and time-lapse satellite imagery further reinforces the case against BCTS.

This report is intended as a call to action—to decision makers in the BC government including the Premier, Minister of Forests, MLAs and staff—as well as to forestry workers, stakeholder organizations, and the public at large to demand change for the future of forests and communities in the long term.

This discussion paper is structured into four sections and identifies 24 reasons why BCTS must be reformed or dismantled:

**A rare remaining old growth Western red cedar in the heavily logged BC Timber Sales landscape unit between Kaslo and New Denver in the West Kootenays. This is the photo we used in the SWL logo.**

Credit: Save What's Left Conservation Society.



## 24 reasons why BCTS must be reformed

### Governance Failures and Breaches of Trust

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

2| BCTS Enjoys Protections and Advantages That Corporations Don't

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 Better Information Being Available

7| Narrow BC Government Parameters for Review of BCTS (announced in January 2025) Fail 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 Sustainability Standards (SFI)

13| BCTS Historically and Currently Focuses Solely on Timber Extraction

### Structural and Policy-Driven Considerations

14| Reforming Forestry Practices on BCTS Managed Areas is Simpler Than on Private and Corporate Tenured Areas, Making it a Practical Starting Point for Change

15| BCTS is Failing to Implement Landscape-level Planning Effectively

16| BCTS and the BC NDP Backtracked on Halting Old-Growth Logging

17| BCTS Gives Preferential Treatment to Industry Stakeholders and Excludes Broader Public and Environmental Values

18| BCTS's Auction-Based Pricing Model Understates the Value of BC Timber

19| BCTS has Failed to Promote Value-Added Market Sales in Its 22-Year History

### Socioeconomic and Community Impact

20| Reform of BCTS Can Serve as a Catalyst for Broader Forestry Reforms

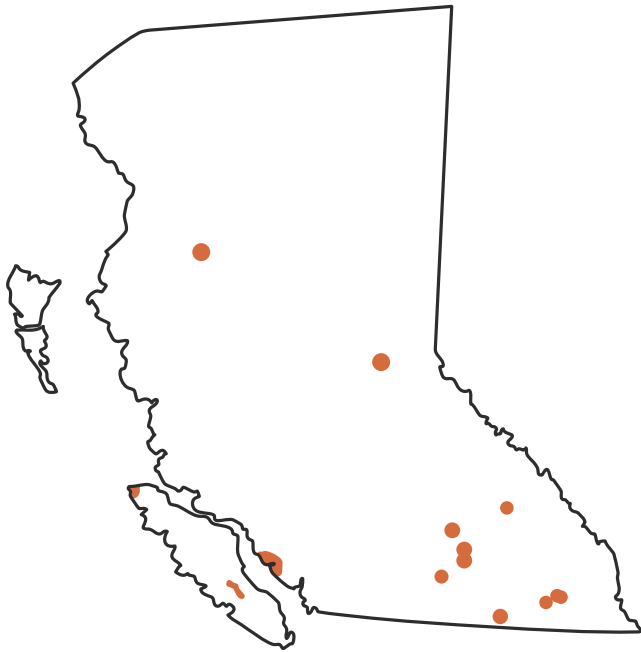
21| BCTS Frequently Logs in Areas where Local Residents Oppose Logging

22| BCTS Foments Division Related to Old-Growth Logging and First Nations

23| BCTS Exaggerates its Economic and Job Contributions

24| BCTS Areas Need to be Included in the "30x30" Conservation Target to Prevent Low-Value Land from Being Over-Represented

## Grassroots Groups Pushing Reform of BCTS



### **Bulkley Valley Stewardship Coalition /**

Bulkley Valley

### **Elphinstone Logging Focus /**

Sechelt, Sunshine Coast

### **Boundary Forest Watershed Stewardship Society /**

Grand Forks

### **Peachland Watershed Protection Alliance /**

Peachland

### **Kootenay Forest Watch /**

Castlegar

### **Save What's Left Conservation Society /**

Nelson

### **Last Stand West Kootenay /**

Nelson

### **Armstrong Spallumcheen Trails Society /**

Armstrong

### **Conservation North /**

Prince George

### **Vancouver Island Forest Focus /**

Cape Scott and Nahmint Valley

### **Old Growth Revylution /**

Revelstoke

### **Help Our Watersheds /**

Coldstream

### **Upper Chum Creek (Skimikin) Water Users Association /**

Chase

**These grassroots, volunteer-based groups harness the voices of thousands of BC residents impacted by BC Timber Sales.**



**Karen Price (PhD),**  
**independent forest ecologist and past**  
**member of the provincial Old Growth**  
**Technical Advisory Panel:**

*"By logging the most at-risk big-treed and ancient forests in BC, BCTS destroys the irreplaceable globally-rare ecosystems that it had committed to conserve. By clearcutting old growth, BCTS fails to mitigate the climate crisis and worsens impacts such as flooding and wildfire. By logging primary forest after natural disturbance, BCTS decreases forest resilience and hinders recovery. The science is clearer day-by-day about these impacts. Yet BCTS claims to strive for excellence in sustainable forest management, to incorporate scientific advances, and to address the climate crisis. I conclude that BCTS either needs to reform practices to match its claims or to reword the claims to stop misleading the public."*

# Part 1: Governance failures and breaches of trust

**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, BCTS has a fiduciary duty to steward public resources responsibly. Yet, BCTS consistently prioritizes timber extraction over the broader public interest.

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.



A BCTS clearcut near Kaslo. Time-lapse imagery of how BCTS has managed this landscape unit, a critical wildlife corridor between Kokanee and Goat Range provincial parks, is stark. There is minimal natural, primary forest left.

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.

**Action: Legislate a public interest mandate for BCTS that holds ecological integrity, climate adaptation, and Indigenous rights with at least the same level of importance as timber volume targets.**

## 2 | BCTS Enjoys Protections and Advantages That Corporations Don't

BCTS operates with unique privileges as part of the Ministry of Forests (MOF), enjoying protections and resources that are not available to private corporations. This integration allows BCTS to sidestep checks and balances that corporations are required to navigate, including:

### **Self-approval of logging plans:**

While corporations require MOF district managers' approval of their logging plans, BCTS regional managers approve their own cutblocks and roads. This lack of independent oversight fosters conflicts of interest and undermines responsible and transparent decision-making.

Timber Sales Managers (TSMs) of each of the 12 BCTS "Business Areas" around the province are responsible for making decisions relating to Timber Sale Licences (proposed cutblocks) going to auction. This includes identifying the location of blocks, overseeing field work and mapping for projected harvest volumes, hydrology, species at risk and other values, and overseeing the auction process and the awarding of Timber Sales Licences (TSLs).

Lacking MOF oversight, the current structure is a clear conflict of interest and clear example of regulatory capture.

The TSM is bound to fulfill the BCTS "Sales Schedule" (which sets out a timeline for auctioning various blocks during the fiscal year) and is therefore responsible for meeting the economic objectives of their business area. How can a TSM be impartial in their decision-making and properly weigh impacts to multiple forest values when they are bound to optimize revenue from BCTS managed lands?

Moreover, while MOF District Managers are obliged to provide written reasons for their decision, BCTS TSMs are exempt from this procedural safeguard.

### **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.



The Sproule and Rixen Creek watersheds in the West Kootenays provide water to hundreds of homes downstream. This area, which BCTS calls "Smallwood," has been particularly aggressively logged under the guise of first the pine beetle and now the fir beetle.

While traditional Tree Farm Licence (TFL) holders must submit their data for verification by a regional MOF old growth specialist, BCTS is not required to 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, BCTS as part of the MOF, has an inside track on information and government deliberations regarding contentious issues or impending legislative changes—an advantage corporations do not have.

The Canadian Centre for Policy Alternatives recently exposed the scale of institutional capture within MOF, as ministry officials modified mapping of old-growth areas (which had been identified by the Old Growth Technical Advisory Panel (TAP)) in order to facilitate logging.<sup>1</sup>

### **Reduced enforcement:**

In April 2023, the Compliance and Enforcement Branch (CEB) of the MOF issued General Order #5, instructing their staff not to investigate government non-compliance.

The Order referred to recent legal advice from the BC Ministry of Attorney General and stated that “pursuing enforcement action against government bodies creates a legal risk for government and it is an inefficient use of CEB resources that should be allocated to other high priority legislative investigations.”<sup>2</sup>

This directive removed a critical layer of accountability for BCTS and set a troubling precedent for lack of oversight—while further demonstrating the uneven playing field between BCTS and private-sector forestry entities.

### **Access to government financial resources:**

Additionally, BCTS can access the province’s financial resources to fund infrastructure projects, such as roads into remote areas. These investments, which corporations might avoid due to low profitability, allow BCTS to exploit forests in areas that would otherwise remain inaccessible.

Beyond the capital funds allocated for road and other infrastructure construction, BCTS can also access its vast staff resources and operational budgets in the 12 business areas for engineering, project management and other functions associated with this infrastructure development to remote areas.

**Action: End internal approvals within BCTS. Require independent oversight for cutblock approvals and OGMA removals by non-BCTS Ministry staff.**

## **3 | Forestry Corporations Have Incentives for Sustainable Management, While BCTS Does Not**

A private 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

<sup>1</sup> “B.C. Forests ministry watering down old growth protection: CCPA,” Business in Vancouver, March 7, 2024 < <https://www.biv.com/news/economy-law-politics/bc-forests-ministry-watering-down-old-growth-protection-ccpa-8414152> >.

<sup>2</sup> MOF, General Order Part 2 Order #5 – 2023, issued April 27, 2023 by the Deputy Director of Operations; “Do not investigate: The hobbling of the B.C. forestry policing service sets a troubling precedent,” The Conversation, September 8, 2024 < <https://theconversation.com/do-not-investigate-the-hobbling-of-the-b-c-forestry-policing-service-sets-a-troubling-precedent-230635> >.



Lieutenant Dan is the biggest known Ponderosa pine in BC. While BCTS will spare this tree with a small buffer zone around it, the rest of the forest around it at Cai Creek near Castlegar is still fair game.

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 directed to contribute 20% to the province's Allowable Annual Cut (AAC), yet it is tasked with doing this on only 17% of the province's land base available for harvest. This means BCTS is harvesting at rates that exceed the rate of harvest on corporate TFLs.

In March 2023, the Canadian Centre for Policy Alternatives (CCPA) accused BCTS of undermining old-growth protection by removing over half the areas recommended for deferral by the TAP, effectively allowing logging in some of BC's most valuable ancient forests. Additionally, leaked data indicates that BCTS has been substituting these high-value old-growth areas with areas containing smaller, less commercially valuable trees, thereby diluting conservation efforts.<sup>3</sup>

**Action: Tie BCTS logging approvals to performance metrics for ecological protection and community benefit—not strictly volume-based targets.**

<sup>3</sup> "B.C. logging firm wants to avoid cutting old growth, but province said it must pay," Vancouver Sun, March 5, 2023 < <https://vancouversun.com/business/local-business/bc-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 catastrophic flooding in Grand Forks in 2018. This case highlights the consequences of failing to properly manage forests with climate resilience in mind. A Forest Practices Board

complaint regarding logging in the Kettle Valley raises further concerns about inadequate forest practices in the region.<sup>4</sup>

Anthony Britneff, a former MOF employee and senior professional forester, has described the Ministry's practices — including those of BCTS — as doing “irreversible harm to the environment and to British Columbians.”<sup>5</sup>

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

**Action: Mandate climate change adaptation planning and implementation for all BCTS operations, including assessments for hydrological risk, wildfire risk impacts on biodiversity, wildlife, and species at risk. Utilize BCTS operating areas for 3rd party research and monitoring of impacts and effectiveness of BCTS practices.**



**Figure 1. Trees grow much more slowly in the BC Interior, such as this hemlock stump beside a new BCTS road near Riondel. With about 140 growth rings, it is technically old growth, although the stump is only 11" wide.**

<sup>4</sup> BC Forest Practises Board, Did Licensees Meet Cutblock Size Rules in the Kettle River Watershed?, September 17, 2024, < <https://www.bcfpb.ca/release-publications/releases/did-licensees-meet-cutblock-size-rules-in-the-kettle-river-watershed/> >.

<sup>5</sup> “Sprawling clearcuts among reasons for B.C.’s monster spring floods,” The Narwal , March 13, 2019 <<https://thenarwhal.ca/sprawling-clearcuts-among-reasons-for-b-c-s-monster-spring-floods/>>.



This photo shows one of six BCTS clearcuts between Kokanee Glacier Provincial Park and Kokanee Creek Provincial Park. Based on evidence of surviving planted trees, this block and the two higher blocks appear to have been planted unsuccessfully, and then burned in September 2024.

## 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 often refuses to disclose the names of professionals, such as foresters and hydrologists involved in the

development of specific cutblocks for auction. This secrecy undermines one of the supposed cornerstones of the professional reliance model: transparency and accountability.

The professional reliance model has been widely criticized for creating conflicts of interest and other problems, as described in detail in an important 2018 report by Mark Haddock.<sup>6</sup> 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 very difficult to hold BCTS accountable for sustainability failures, whether province-wide or at the regional level.

<sup>6</sup> Mark Haddock, Professional Reliance Review: The Final Report of the Review of Professional Reliance in in Natural Resource Decision-Making, May 2018 < [https://professionalgovernancebc.ca/app/uploads/sites/498/2019/05/Professional\\_Reliance\\_Review\\_Final\\_Report.pdf](https://professionalgovernancebc.ca/app/uploads/sites/498/2019/05/Professional_Reliance_Review_Final_Report.pdf) >. See also “NDP orders review of government reliance on industry-hired experts,” Vancouver Sun, August 12, 2017 < <https://vancouversun.com/news/local-news/ndp-orders-review-of-government-reliance-on-industry-hired-experts> >.

Save What's Left (SWL) is aware of complaints submitted to regulatory bodies including FPBC, Engineers and Geoscientists BC (EGBC), the Office of the Superintendent of Professional Governance (OSPG) and former Minister of Forests Bruce Ralston which have not resulted in meaningful action.

SWL is also aware of cases where forestry professionals who have made complaints against their peers have been subject to reviews themselves or have faced punitive repercussions.

Although the BC NDP government appointed Mark Haddock to review the professional reliance system shortly after it took office in 2017, the review's major outcome was the creation of the OSPG — a body that, based on SWL's inquiries, lacks the authority or effectiveness to address systemic issues. The professional reliance model remains a major roadblock to forestry reform in BC, as it allows unsustainable practices to continue without adequate external oversight or consequences.

**Action: Reform the Professional Reliance system by requiring external, arm's-length audits of BCTS forestry decisions as well as planning, practices, results and effectiveness.**

## 6 | BCTS Uses Outdated Information and Mapping Despite Better Information Being Available

The BC government invested years of effort and public funds updating and refining the Biogeoclimatic Ecosystem Classification (BEC) system, which classifies the province's diverse ecosystems based on climate, soil and vegetation characteristics.

In the Kootenay Boundary Region (KBR), updated BEC Version 12 has been publicly available since 2021, and BCTS, MOF and other licensees use this version for almost all planning and operations. However, despite the 2002

Higher Level Plan Order (HLPO) committing the Province to update BEC mapping versions "as soon as practicable," BCTS, MOF and other licensees still rely on old BEC versions for managing old and mature forest targets.

This is because reliance on the old, outdated mapping reduces the number of ecosystems the Province and licensees must consider, as well as reducing the degree of non-compliance apparent in most ecosystems.

In the Kootenay Business Area, BCTS continues to rely on BEC 3, a version last updated in 1995, to ensure minimum old and mature forest retention. This means that current forest management decisions are based on information that is three decades old, and which undermines many areas set aside in Old Growth Management Areas (OGMAs) that overlap heavily with provincial (and even federal) parks and protected areas outside the timber harvesting land base.

When the original BEC retention targets were established, it was assumed that  $\geq 12\%$  of old and mature forest targets were already satisfied in parks and protected areas (though this was not properly verified). As a result, designating OGMAs in parks and protected areas is a form of double counting the same old/mature forest budget. This situation compromises the integrity of professional reliance, as forest professionals are mandated to use the best available current information to uphold the public interest.

As an entity of the BC government, BCTS should be applying the most current and accurate ecosystem classifications published by government staff to manage Crown lands in the public interest.

Indeed, the previous BC Chief Forester Diane Nicholls and the current Deputy Chief Forester Albert Nussbaum both directed MOF (and, by extension, BCTS) to shift to updated BEC in the latest TSR determinations for the Arrow and Kootenay Lake TSAs, respectively.

A related problem is manipulation of Old Growth Management Areas (OGMAs) by MOF and BCTS to prioritize timber extraction in the oldest and/or highest productivity stands.

In many parts of BC, OGMA's are aspatial, allowing for replacements and boundary adjustments, thereby enabling progressive logging of these high-value stands. This aspatial flexibility in OGMA designation is a policy loophole rather than a robust conservation tool. Where applied, the majority of OGMA's do not contain old growth, while valuable old-growth forests exist outside of these designated areas.<sup>7</sup> This critique is well-supported by environmental advocacy groups and forestry watchdogs who have raised concerns about the inadequate protection provided by current OGMA's, including

the Canadian Parks and Wilderness Society.

MOF maintains a mapping database of historical OGMA's that is not accessible for individuals or parties outside the government.

SWL believes this database, if disclosed, could reveal past alterations in OGMA polygons by MOF and BCTS that benefit timber extraction to the detriment of old growth.

**Action: BCTS must immediately spatialize OGMA's in their tenure areas based on current forest inventory data.**

<sup>7</sup> Conflicting portrayals of remaining old growth: the British Columbia case. Canadian Journal of Forest Research, 51(5), 742-752. 2021, Karen Price, Ph.D., Rachel F. Holt, Ph.D., R.P.Bio and Dave Daust R.P.F., M.Sc. <https://cdnsiencepub.com/doi/10.1139/cjfr-2020-0453>



Historical logging within the Old Growth Management Area (OGMA) above BCTS's contentious Cai Creek cutblock near Castlegar. However, other sections of the block contain all the attributes of an old growth forest that has never been logged, and yet these areas are not protected within an OGMA.

## 7 | Narrow BC Government Parameters for Review of BCTS (announced in January 2025) Fail to Address Systemic Issues

The proposed review of BCTS announced by the government on January 15, 2025 appears to exclude all other values besides status quo, short-term economic interests.

According to the BC government media release announcing the review: “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
- lead in innovative, sustainable forest management and silviculture practices.”<sup>8</sup>

SWL regrets that the parameters and structure of this review lack content that would provide First Nations or the public with confidence that their objectives and concerns with respect to old and ancient forests are being considered, or that the needed reform of BCTS is being taken seriously by the province.

**Action: Broaden the scope of the BCTS review to include ecological science, public interest, and Indigenous leadership—not just economic outputs.**



A load of exceedingly rare old growth heads down the road near Nelson, 2024.

<sup>8</sup> BC Government media release, “Province launches BC Timber Sales review,” January 15, 2025 < <https://news.gov.bc.ca/releases/2025FOR0001-000013> >.

# Part 2: 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.<sup>9</sup>

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 SWL’s on-the-ground observations.

Many cutblocks in the West Kootenay region contain trees that qualify as definition old growth, yet BCTS continues to classify and propose these blocks for logging based on questionable age assessments.

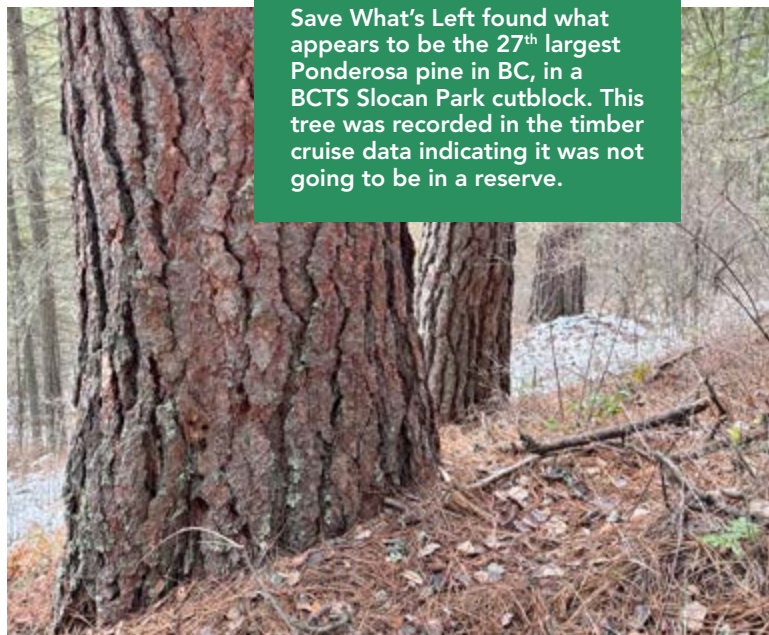
<sup>9</sup> BCTS, “Guidance on BCTS Implementation of Technical Advisory Panel (TAP) Old Growth Deferral Polygon Recommendations”, May 15, 2023, < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/policy/may\\_15\\_2023\\_guidance\\_on\\_bcts\\_management\\_of\\_old\\_growth\\_deferrals.pdf](https://www2.gov.bc.ca/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 Western red cedar found in one of BCTS’s proposed Oscar Creek cutblock near Ymir, has a diameter of 155cm. While a 5’ diameter cedar isn’t that rare on the Coast, it is exceptionally rare at high elevation in the Interior.



## Specific examples include:

- **Castlegar/Cai Creek (TA2185-3):** This highly controversial, low elevation cutblock features many old growth trees which have survived wildfires within a kilometre of Castlegar. Lower Cai was mapped as an “intact watershed” by the TAP, and it has many other significant ecological values. These 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 pines 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 cutblocks contain trees that meet Old Growth age criteria, within the area scheduled for harvesting,” but this sheet has since been revised. This cutblock is the subject of current BCFPB and FPBC complaints.<sup>10</sup>
- **Ymir/Oscar Creek (TA1472):** These higher elevation cutblocks contain hundreds of massive old growth trees of diverse species, ranging up to >700 years of age, based on tree cores. BCTS fails to acknowledge that the Oscar Creek stand is highly productive old growth forest used by listed Northern Goshawks, and that this BEC ecosystem within the Stagleap landscape unit is deficient in old growth. Moreover, the OGMA area proposed for logging was set aside for old forest retention, as per BCTS’s Forest Stewardship Plan (FSP) commitments. These blocks are the subject of a current Forest Practices Board complaint against BCTS, as noted on the BCFPB website: “Three professional biologists are concerned that:
  - › logging of two cutblocks at Oscar Creek will cause harm to breeding goshawks, and
  - › there is a systematic failure to manage old growth in the region in accordance with legal requirements and the Kootenay Boundary Land Use Plan.”<sup>11</sup>
- **Kaslo/Robb Creek (TA2348-2):** This 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, an area heavily logged by BCTS and other operators. Additional 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 various stages of development.<sup>12</sup>



Save What's Left found what appears to be the 27<sup>th</sup> largest Ponderosa pine in BC, in a BCTS Slocan Park cutblock. This tree was recorded in the timber cruise data indicating it was not going to be in a reserve.

<sup>10</sup> SWL, Submissions re: TA2185-3, Dec. 2024 < <https://savewhatsleft.ca/cai-creek%2Fcastlegar> >.

<sup>11</sup> BCFPB, Current Complaints < <https://www.bcfpb.ca/wp-content/uploads/2025/01/Current-Complaints.pdf> >.

<sup>12</sup> See SWL, Robb Creek Update < <https://savewhatsleft.ca/robb-creek%2Fkaslo> >.

- **Bonnington/Sproule Creek (SMA034 and others):** 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 wildfire-surviving veteran 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.<sup>13</sup>
- **Slocan Park (TA2335, particularly TA2335-2):** This area is a critical wildlife corridor and important ungulate winter range. Block TA2335-2 includes the 27th-largest Ponderosa pine on record, which SWL 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 approximately 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 ungulate winter range. Resident elk using this narrow 7 km long corridor will have no other option but to use a new or replanted 10-year-old clearcut.<sup>14</sup>

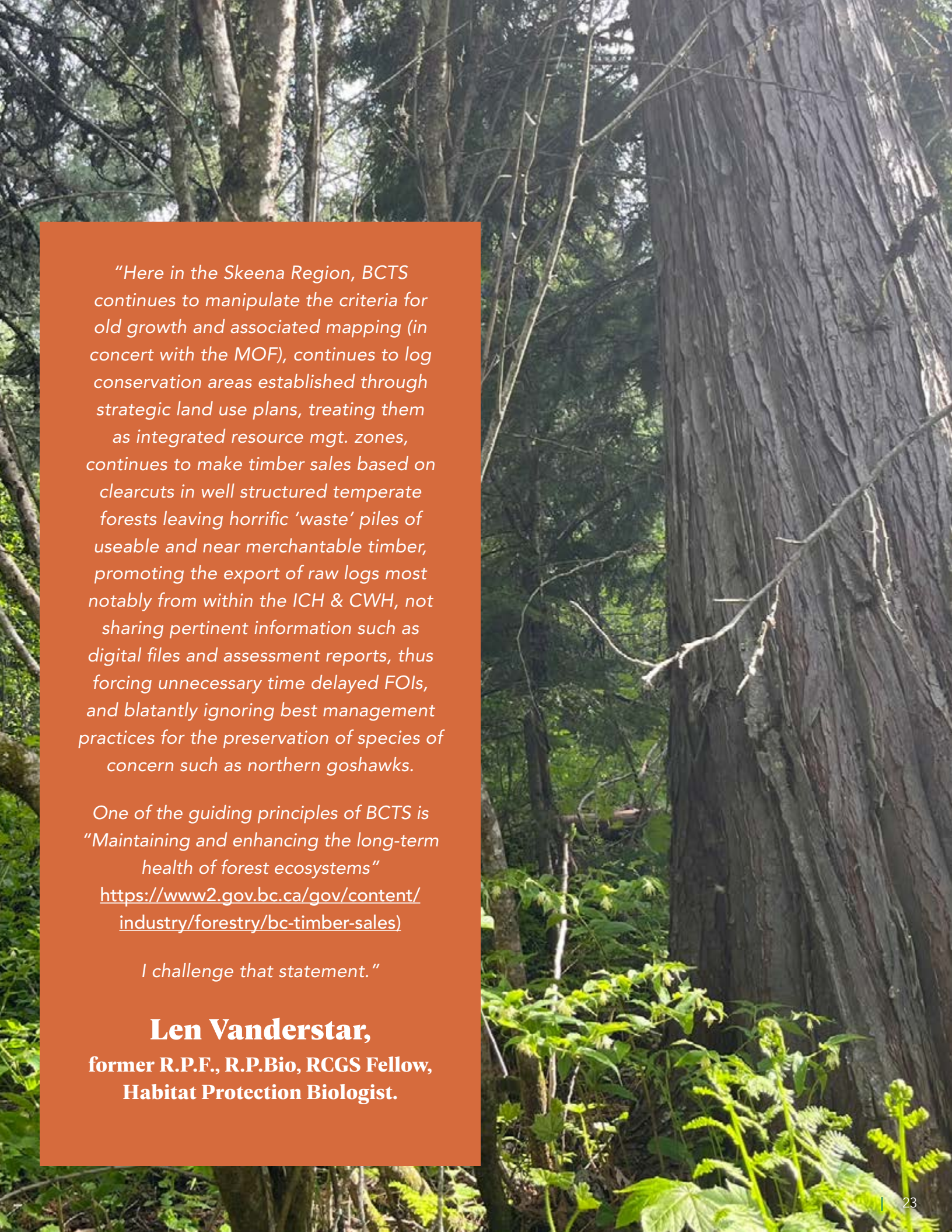
These proposed cutblocks demonstrate how BCTS prioritizes timber extraction over ecological, biodiversity and community considerations. BCTS planning and practices not only threaten biodiversity but also amplify risks like wildfire and watershed degradation, especially in areas already heavily logged.

The cutblock examples above are all located in the West Kootenays, but similarly misguided harvesting plans are repeated throughout BCTS' other 11 business areas. A list of BCTS controversial logging hotspots can be found at on the SWL website at: <https://savewhatsleft.ca/around-the-province>.

**Action: Require independent age verification for all proposed cutblocks containing suspected old-growth attributes before approval.**

<sup>13</sup> SWL, "Sproule/Rixen 2024 BCTS Clearcuts" < <https://savewhatsleft.ca/sproule-creek%2Fnelson> >.

<sup>14</sup> SWL, "Slocan Park 2025 BCTS Cutblocks" < <https://savewhatsleft.ca/slocan-park> >.



*"Here in the Skeena Region, BCTS continues to manipulate the criteria for old growth and associated mapping (in concert with the MOF), continues to log conservation areas established through strategic land use plans, treating them as integrated resource mgt. zones, continues to make timber sales based on clearcuts in well structured temperate forests leaving horrific 'waste' piles of useable and near merchantable timber, promoting the export of raw logs most notably from within the ICH & CWH, not sharing pertinent information such as digital files and assessment reports, thus forcing unnecessary time delayed FOIs, and blatantly ignoring best management practices for the preservation of species of concern such as northern goshawks.*

*One of the guiding principles of BCTS is "Maintaining and enhancing the long-term health of forest ecosystems"*

*<https://www2.gov.bc.ca/gov/content/industry/forestry/bc-timber-sales>*

*I challenge that statement."*

**Len Vanderstar,**

**former R.P.F., R.P.Bio, RCGS Fellow,  
Habitat Protection Biologist.**

## 9 | BCTS Fails to Differentiate Between Primary and Previously Logged Forests

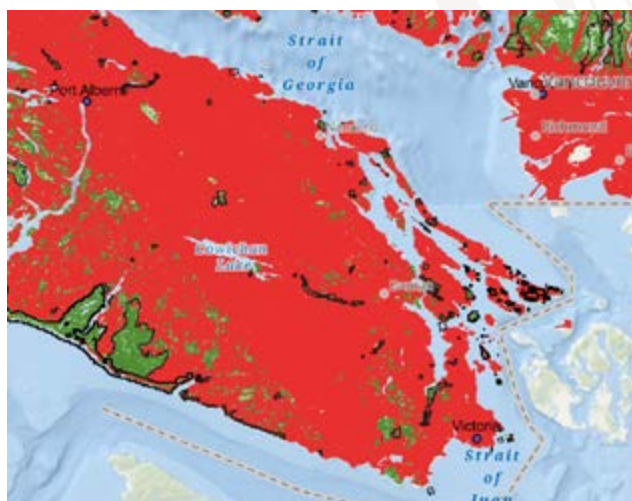
BCTS does not differentiate between primary forests — those that have experienced minimal human disturbance — and previously logged forests. This disregard runs counter to ecological theory recognizing the vastly different ecological functions and values provided by primary forests compared with managed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

Dead trees equal habitat. Proposed 2025 Slocan Park BCTS cutblock.



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.



### Seeing Red v. 2.0: BC’s last primary forests

- Primary forest (higher productivity)
- Primary forest (lower productivity)
- Disturbed by industrial human activity
- Non Forest or no data

Primary forest is forest of any age that has never been industrially logged. It includes natural forests recently disturbed by wildfire, wind or insects. Not all primary forest is old growth, but all old growth in BC is primary forest.

Figure 2. In 2021, Conservation North published an online interactive map called “Seeing Red” painting a troubling picture of how little primary forest is left in BC. This screenshot of the map focuses on south Vancouver Island and the Lower Mainland; the rest of the province is equally concerning. <https://conservationnorth.org/were-seeing-red/>

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 jurisdictions 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.<sup>15</sup>

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

**Action: The Ministry of Forests must first adopt internationally agreed upon definitions of primary forest. BCTS must then conduct and publish an inventory of remaining primary forest in its operating areas and prohibit logging in these zones.**

## 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, land slides, 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 scientific evidence, BCTS's current business plan estimates the volume of wood harvested will increase from 4.4-million m<sup>3</sup> in 2022–2023 to 8.5-million m<sup>3</sup> by 2025–2026, with post-disturbance logging being a significant contributor to this spike. This unsustainable

<sup>15</sup> Old Growth Forest Ecology, "Saprophytic plants," n.d. < <https://oldgrowthforestecology.org/glossary/saprophytic-plants/> >.

increase is described in the [BCTS Business Plan 2023-2024 to 2025-2026](#).<sup>16</sup>

As the New York Times has reported, there is a correlation between commercial logging and increased wildfire risk and intensity:

**“Scientists say hotter temperatures driven by climate change, combined with drought, have played a role in making wildfires bigger and more destructive. They also say that thinning can reduce the cooling shade of the forest canopy and change a forest’s microclimate in ways that can increase wildfire intensity.”<sup>17</sup>**

Experts in wildfires, wildlife, soil, hydrology and carbon have reviewed the negative consequences of post-disturbance harvesting.<sup>18</sup> This research has been examined in the context of BC forests in this recent Conservation North webinar: [Gaming the System - The Truth About Salvage Logging](#).<sup>19</sup>

A November 2024 article in the industry-aligned Spar Tree Group describes 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.”<sup>20</sup>

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<sup>16</sup> BCTS, BCTS Business Plan 2023-2024 to 2025-2026 < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/business-plans-performance-reports/bcts\\_business\\_plan\\_2023-2024\\_to\\_2025-2026\\_final.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/business-plans-performance-reports/bcts_business_plan_2023-2024_to_2025-2026_final.pdf) >.

<sup>17</sup> “Trump Moves to Increase Logging in National Forests,” New York Times, March 2, 2025 < <https://www.nytimes.com/2025/03/02/climate/trump-logging-national-forests.html> >.

<sup>18</sup> DellaSala 2008; Lindenmeyer et al. 2012; DellaSala and Hanson 2024.

<sup>19</sup> “Gaming the ecosystem: the truth about salvage logging,” presentation by Conservation North, July 22, 2024 < [https://www.youtube.com/watch?v=CUEISpw\\_\\_Nk](https://www.youtube.com/watch?v=CUEISpw__Nk) >.

<sup>20</sup> “Third Quarter Update – BC’s Timber Harvest,” Spar Tree Group, November 29, 2024 < <https://www.spartreegroup.com/post/third-quarter-update-bc-s-timber-harvest> >.



Depending on severity, many trees may survive a wildfire such as in this forest near Argenta that burned in 2024. The surviving trees go on to become old growth “veterans” in a natural primary forest. So-called salvage logging, better described as post-disturbance logging is highly controversial.

Credit: Louis Bockner.

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.

**Action: BCTS must immediately prioritize harvesting in the wildland urban interface (WUI) - but only according to best practices to reduce fire risk and increase forest resilience to wildfire and climate change.**

## 11 | BCTS Practices 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 - 40-year-old stands in the Interior that were broadcast burned before planting showing resistance to wildfire. 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](#), April 23, 2024;
- "Out of Control: A Growing Area of High-Hazard Clearcuts and Plantations is Fuelling BC's Raging Forest Infernos," [Focus on Victoria](#), August 11, 2021;
- "Wildfires and Old Growth: Facts vs. Fiction," [presentation by Rachel Holt hosted by Wildsight](#), April 18, 2024;
- "Most of BC's 2023 Wildfires Burned in a Small Area of BC Subject to Intense Industrial Development," [Evergreen Alliance](#), March 7, 2024;
- "Okanagan fire/drought/flood: The Emperor Wears No Clothes," [Vernon Morning Star](#), July 4, 2024; and
- "New Trees Are No Substitute for Old Trees," [Politico](#), June 11, 2023.



In 2015, BCTS logged above the residential area of Slocan Park, replacing widely spaced big trees with minimal undergrowth with a pine/fir plantation of tightly spaced trees. BCTS is planning on logging the rest of this 7km narrow wildlife corridor.



BCTS relies on SFI certification to back up its claims of sustainability. Yet SFI is a highly flawed, industry-backed scheme enabling unsustainable logging around the world. This photograph shows a recent BCTS cutblock near New Denver, BC.

**Action: BCTS must immediately implement a ban on aerial spraying of glyphosate.**

**Action: Use BCTS managed lands for unbiased research on climate change adaptation and wildfire mitigation.**

**Action: BCTS must update silviculture guidelines using more deciduous regrowth, lower stocking standards, and plan fire breaks using deciduous forest.**

## 12 | BCTS Relies on Flawed Sustainability Standards (SFI)

BCTS justifies its sustainability claims using the third-party SFI (Sustainable Forestry Initiative) 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 with the Competition Bureau of Canada. The groups alleged that SFI's "sustainable" logging certification is both "misleading" and "false."<sup>21</sup> The Competition Bureau 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, some of the largest and most environmentally damaging forestry corporations in North America.<sup>22</sup>

SFI has been criticized for a number of 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 caribou recognized as endangered under the federal Species At Risk Act.
- 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 favouring 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."



<sup>21</sup> Ecojustice media release, "Environmental groups fight greenwashing in forestry 'sustainability' certification scheme," December 2, 2022 < <https://ecojustice.ca/news/environmental-groups-fight-greenwashing-in-forestry-sustainability-certification-scheme/> >.

<sup>22</sup> SFI, "SFI Governance & Sound Decision-Making", n.d. < <https://forests.org/board/> >.

This reasoning raises significant concerns and when asked directly whether BCTS's harvesting practices are sustainable, BCTS's 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.”**

(email to SWL, April 24, 2024)

An in-depth Reuters investigation from September 2024 highlights how certification schemes like SFI enable unsustainable logging.<sup>23</sup> An earlier report in 2014 noted 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.”<sup>24</sup> SWL has been unable to identify any documented instances where SFI suspended a certificate in its history.

SWL is concerned that BCTS's (and, by extension, the MOF's and BC's) reliance on SFI certification sidesteps addressing ecological and climate concerns. SFI fails to provide the transparency, accountability and robust environmental checks that are necessary to ensure truly sustainable forestry practices.

**Action: BCTS needs to abandon SFI entirely and apply to be certified by FSC. The government must define “sustainable” for themselves and perform ongoing compliance audits against this standard.**

## 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 ongoing degradation of representative ecosystems and associated values.

SWL notes that 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 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/flow, retention and flood control, threatening public health and safety.
- Biodiversity and Species at Risk: BCTS logging impacts wildlife breeding, roosting and overwintering habitats for listed species (e.g., Woodland Caribou, Northern Goshawk, Fisher, Silver-haired Bat, Northern Myotis, Grizzly Bear, Western Screech-Owl, Flammulated Owl, Williamson's Sapsucker, etc.), thereby accelerating biodiversity loss, and contributing to species at risk extirpation and/or extinction.

<sup>23</sup> “‘Sustainable’ logging operations are clear-cutting Canada’s climate-fighting forests,” Reuters, September 7, 2024 < <https://www.reuters.com/investigates/special-report/canada-forests-climate/> >.

<sup>24</sup> “Greenwashing claims made against major forest certification organization,” Packaging Digest, January 28, 2014 < <https://www.packagingdigest.com/packaging-design/greenwashing-claims-made-against-major-forest-certification-organization> >.

- Cultural heritage resources: BCTS disrupts sacred sites, culturally modified trees, and traditional hunting and harvesting areas, eliminating ancient trees whose rings bear witness to FN's management and cultural burning over many centuries 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: BCTS-authorized forestry activities disrupt trapping and grazing areas, undermining their productivity and cultural significance.

**Action: Shift BCTS's mandate to include binding requirements to protect biodiversity, water, and cultural values.**



"Community Watershed – Keep it Clean." Prior to 2010, there was no intrusion into this Pass Creek community watershed. It is now awash in BCTS clearcuts and more are being proposed.

# Part 3: Structural and Policy-Driven Considerations

**BCTS operations are deeply entwined with Ministry of Forests structure and policy, underscoring the need for far-reaching reform.**

## 14 | Reforming Forestry Practices on BCTS-Managed Areas is Simpler Than on Private and Corporate Tenured Areas, Making it a Practical Starting Point for Change

Reforming or removing Tree Farm Licence (TFL) tenure for corporations is more complex and potentially financially costly than reforming forestry practices in BCTS operating areas. If conserving the last unprotected primary forests is a priority, then focusing on BCTS-managed land offers the simplest and most achievable path.

Proposals to modify or buy out agreements with TFL holders would likely result in substantial costs for the province, whereas immediate operational, regulatory and legislative changes on BCTS-managed lands can efficiently protect endangered species, habitats and watersheds, while mandating a transition away from clearcut logging.

Simple reforms to the statutes, regulations and policies that govern BCTS operations — such as making the logging of legally defined old growth forests unlawful — would eliminate ambiguity and streamline enforcement. Public support is overwhelming: a 2019 Sierra Club survey found that 92% of British Columbians favour action to protect old-growth forests.<sup>25</sup>

**Action: Implement immediate moratoriums on logging in vulnerable and/or high-risk BCTS areas as a first step in demonstrating low-cost, high-impact reforms.**

## 15 | BCTS is Failing to Implement Landscape-level Planning Effectively

BCTS has stated as recently as March 2024 (in a meeting with SWL in Castlegar) 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.”<sup>26</sup>

The BC NDP touts “forest landscape planning” as the future of ecologically-sound forestry in the province, yet progress on such plans has been slow since the government published the bulletin stating this in March 2022.<sup>27</sup> SWL has had dialogue with a number of forestry professionals who have indicated that implementation of province-wide forest landscape level plans is

<sup>25</sup> Sierra Club BC media release, “Poll shows nine in ten British Columbians support action to protect endangered old-growth forest,” November 4, 2019 < <https://sierraclub.bc.ca/forestpoll/> >.

<sup>26</sup> MOF, “Forest Landscape Plans FAQ,” n.d. < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-landscape-plans/flp\\_faq.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-landscape-plans/flp_faq.pdf) >.

<sup>27</sup> MOF, “Forest Landscape Plans: An Information Bulletin,” n.d. c. March 2022 < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-landscape-plans/flp\\_info\\_bulletin\\_for\\_pilots.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-landscape-plans/flp_info_bulletin_for_pilots.pdf) >.

estimated to take at least ten more years, by which time all accessible (economically viable) primary forests in the province will likely have been logged.

**Action: Require BCTS to halt approvals in landscape units lacking an implemented Forest Landscape Plan co-developed with and consented to by First Nations.**

## 16 | BCTS and the BC NDP Backtracked on Halting Old-Growth Logging

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 memo to BCTS Timber Sales Managers reversing the promise to stop logging old growth.<sup>28</sup>

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 oppose 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 the vicinity of 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 588 hectares with a volume equivalent to almost 9,000 logging trucks of old growth in the current fiscal year (2024-2025). This information comes directly from their publicly available sales schedule summarised in the table below.

Table 1. 2024-25 BCTS fiscal year proposed logging Old Growth logging on Vancouver Island.

| 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                    |

<sup>28</sup> BCTS, "Guidance on BCTS Implementation of TAP Old Growth Deferral Polygon Recommendations", May 15, 2023, <[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](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)>.

BCTS refuses to answer questions about where it is logging old growth in their 2024-25 and 2025-26 sales schedules, despite being a government entity employing forest professionals with an ethical requirement to serve the public interest. BCTS has stalled for more than 8 months (as of May 2025) in responding to an FOI request, even though this information must be readily available (and is publicly available for the Strait of Georgia BCTS business area).

In May 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.”<sup>29</sup>**

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 the passage of more than 4 years 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.<sup>30</sup>

**Action: Reinstate the 2021 commitment to halt old-growth logging on BCTS lands and make the TAP recommendations legally binding.**



It is common in the Interior for there to be fire-surviving old growth trees intermixed with younger forest. This huge Western red cedar (1.5m DBH) in a proposed cutblock between Kaslo and New Denver is fair game for BCTS.

## 17 | BCTS Gives Preferential Treatment to 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 stakeholder groups.”*<sup>31</sup> 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.

<sup>29</sup> CCPA, “Leaked data reveals new threat to BC’s old growth forests,” Policy Note, March 7, 2024 < <https://www.policynote.ca/old-growth-leak/> >.

<sup>30</sup> MOF, “OG TAP Old Growth Deferral: Background and Technical Appendices”, n.d. < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/og\\_tap\\_background\\_and\\_technical\\_appendices.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/og_tap_background_and_technical_appendices.pdf) >.

<sup>31</sup> BCTS, BCTS Business Plan 2023-2024 to 2025-2026, p. 33.

The groups represented in the TSAC are: Truck Loggers Association, Independent Wood Processors 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, Independent Timber Marketers Association, and the Interior Logging Association.

According to its terms of reference, the purpose of the TSAC is for BCTS to "obtain advice on the range of legislative, policy, business practice, and program performance issues germane to BCTS" from this group.<sup>32</sup> The most recent publicly available TSAC membership data identifies three BCTS staff at the top of the list.<sup>33</sup>

**Action: Dissolve or restructure the Timber Sales Advisory Council to include representation from conservation groups, First Nations, and communities.**

## 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 MOF historically operates with minimal profit, suggests that BC's stumpage fees are undervalued.

This pricing structure deprives the provincial government of fair compensation and raises concerns about the competitiveness and sustainability of BC's timber pricing system.

Moreover, as the BC Forest Practices Board has noted in its submission to the BCTS Review:

**"Under the current BCTS business model, harvesting rights are awarded to the lowest bidder leaving limited ability to improve practice requirements and compel compliance."<sup>34</sup>**



**Tree farm plantations lack the complex structure with various life stages (saplings, mature, dead trees, and decaying wood), and the high degree of biodiversity that are found in primary forests.**

Credit: BCTS proposed cutblock TA2348-2, Robb Creek near Retallack.

<sup>32</sup> BCTS, TSAC Terms of Reference, November 2023 <[https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/committees/tsac\\_tor\\_november\\_2023.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/committees/tsac_tor_november_2023.pdf)>.

<sup>33</sup> MOF, "Timber Sales Advisory Council Membership", September 2019 <[https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/committees/tsac-membership-list\\_sept2019.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/committees/tsac-membership-list_sept2019.pdf)>.

<sup>34</sup> BCFPB, Submission to the BCTS Review, April 1, 2025 <<https://www.bcfpb.ca/wp-content/uploads/2025/04/Board-Submission-BCTS-review.pdf>>.

BCTS has played an integral role in keeping lumber prices artificially low for the past two decades while facilitating unsustainable deforestation. Most 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.<sup>35</sup>

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.



**Figure 3.** These six BCTS clearcuts are hidden from the busy road going up to Kokanee Glacier Provincial Park by a narrow swath of trees. The iconic Kokanee Old Growth Trail is just a few kilometers away. Assuming we are correct in our analysis of the sale of these six blocks, the province's net profit would have been about \$103,000 based on BCTS estimated gross and net revenue for 2023-2024. Incidentally, there was only a single bidder on these blocks who paid only marginally above the minimum bid price.

<sup>35</sup> "Third Quarter Update – BC's Timber Harvest," Spar Tree Group, November 29, 2024 < <https://www.spartreegroup.com/post/third-quarter-update-bc-s-timber-harvest> >.



## SALE OF CROWN TIMBER BID AND DEPOSIT RECORD

Scale Based Timber Sale Licence

|                          |                                |                                                      |                         |                                          |                        |                                                                  |
|--------------------------|--------------------------------|------------------------------------------------------|-------------------------|------------------------------------------|------------------------|------------------------------------------------------------------|
| Page 1 of 1              |                                |                                                      |                         |                                          |                        |                                                                  |
| Licence Number<br>TA0128 | Registration<br>Category<br>A  | Location<br>Kokanee Glacier Public Road/ Bradley FSR |                         |                                          |                        | Held at BC Timber Sales office<br>Kootenay Business<br>Area      |
| Volume (m3)<br>15 099    | Upset Rate<br>(\$/m3)<br>47.84 | Deposit Amount (\$)                                  |                         | Date of Sale<br>YYYY/MM/DD<br>2019-09-12 | Time of Sale<br>11:00  |                                                                  |
| BID<br>NO.               | RECEIVED FROM                  | BCTS REGISTRATION<br>No.                             | BONUS<br>BID<br>(\$/m3) | FORM OF<br>SECURITY                      | DEPOSIT<br>AMOUNT (\$) | SIGNATURE ACKNOWLEDGING<br>RETURN OF DEPOSIT OR<br>DATE RETURNED |
| 1                        | Phoenix Harvesting Ltd.        |                                                      | 2.01                    |                                          |                        |                                                                  |
| 2                        |                                |                                                      |                         |                                          |                        |                                                                  |

Figure 4. Pheonix Harvesting had no competition on this BCTS auction.

**Action: Reform BCTS's auction model to prioritise local economic benefits and truly reflect the ecological costs, including the costs of remediation, recovery and any penalties for poor practices.**

## 19 | BCTS Has Failed to Promote Value-Added Market Sales in Its 22-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 22-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 2022–2023 fiscal year, BCTS fell short of its modest Category 2 target of 650,000 m<sup>3</sup>, achieving only 570,000 m<sup>3</sup>. 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.<sup>36</sup>

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.

**Action: Introduce a tiered bidding advantage or points-system for small-scale, value-added processors committed to job creation and sustainable practices.**

<sup>36</sup> BCTS, Annual Performance Report, April 1, 2022 – March 31, 2023 < [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/business-plans-performance-reports/bcts\\_annual\\_performance\\_report\\_2023.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/business-plans-performance-reports/bcts_annual_performance_report_2023.pdf) >; BCTS, “BC Timber Sales - Category 4 - Value-added Program”, August 8, 2024 < <https://www2.gov.bc.ca/gov/content/industry/forestry/bc-timber-sales/category-4-value-added> >.



This startling photo taken through barbed wire at Domtar’s Vancouver facility shows what is almost certainly big chunks of otherwise unusable old growth trees being run through a chipper, February 2025.

# Part 4: Socioeconomic and Community Impact

**BCTS must be reformed to safeguard the economy, social structure and environmental health of rural BC.**

## 20 | Reform of BCTS Can Serve as a Catalyst for Broader Forestry Reforms

Reforms to BCTS mean reforms to the Ministry of Forests and BC's broader forestry sector.

Sustained public pressure on BCTS, the MOF and the BC Government has the potential to persuade decision-makers to make meaningful change, starting with BCTS but extending to broader forestry practices throughout the province.

For a precedent for change due to public pressure, we can look to BC's very recent history and the Fairy Creek old-growth protection movement on Vancouver Island in 2020–21. In response to this largest act of civil disobedience in BC's history (which involved nearly 1,200 arrests), the government announced deferrals of old-growth logging at Fairy Creek and around the province.

Four years later, the deferral at Fairy Creek appears to be transitioning to permanent protection, as a result of negotiations and agreements between the BC NDP, the BC Greens and local First Nations. However, the broader pattern of "voluntary deferrals" is less promising, as local moratoria on old-growth logging are confined to areas of the province where First Nations were able to unanimously support them. This indicates that additional pressure on BCTS, the MOF and the BC NDP is needed.

**Action: Use BCTS reform as a legislative pilot to implement province-wide forest policy changes—including tenure reform, biodiversity safeguards, and Indigenous governance frameworks.**

## 21 | 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. Front country areas and watersheds are frequently targeted by BCTS Timber Sales Managers.

BCTS, like all other tenure holders, has depleted much of its easily accessible supply of timber. It has responded to these shortages by indicating that it will log more front country and community watershed areas (SWL meeting with BCTS, March 2024).



Logging blockade (not BCTS), Argentina 2022.  
Credit: Louis Bockner.

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.

These local controversies exist alongside the economic arguments regarding the lack of viability of BCTS operations.

**Action: Require BCTS to conduct and report on cost-benefit trade-off evaluations addressing all FRPA values as part of transparent public engagement for proposed roads and cutblocks near populated areas, watersheds or recreation zones.**

**Action: When there is significant community opposition, to specific logging proposals, trade-off evaluations should be subject to third party independent review, in addition to First Nations consent.**



BCTS's proposed cutblock SMA095 near Nelson crosses approximately 6 creeks feeding into Sproule Creek about 300m below. It is lush, wet, north-facing, healthy forest that will be old growth if left to grow for another generation. The community has spoken out strongly against this logging.

## 22 | BCTS Foments Division Related to 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 way this policy decision was implemented has placed 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 First Nations. First Nations were given an impossibly short time frame in which to respond to the question of whether to defer or not defer. No capacity funding to properly answer this question was provided. Initially, the government offered First Nations no conservation funding at all to offset loss of income from old growth logging. Conservation funding continues to be limited, haphazard and contingent on playing nice with the government.

To this day, BCTS misleadingly implies that it has consent to log old growth in territories of First Nations who have not clearly stated they support deferrals. Cynical observers could reasonably conclude that the BC NDP's approach to deferral implementation was orchestrated to absolve government of making the hard decisions themselves (via legislated changes and permanent protections) and instead placed First Nations in the cross hairs of public controversy surrounding old growth logging.

BCTS is complicit with the MOF and other Ministries of the Crown in failing to provide a clear, effective, compelling and adequately



Kokanee BCTS clearcut. Sold in 2019, cut in 2021-2022, appears to have been replanted unsuccessfully, then burned in fall 2024. One of many creeks in these six clearcuts nestled between Kokanee Glacier Provincial Park and Kokanee Creek Provincial Park.

financed option for First Nations to choose conservation, rather than liquidation of remaining old growth in their territory. Indigenous conservation initiatives — whether park proposals, Indigenous Protected and Conserved Areas (IPCAs) or other initiatives — entail convoluted, drawn-out and uncertain processes, which are isolated from the ordinary operations and deliberations of MOF and BCTS. Consent for logging is foregrounded as the “preferred option,” with MOF investing substantial public resources each year to “buy back” social licence to log old-growth through revenue-sharing agreements with First Nations.

One of the most obvious advantages of dismantling BCTS (if reform is deemed undesirable or impractical) would be that First Nations could absorb the 20% of the 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.

**Action: Establish clear protocols for BCTS to engage First Nations governments transparently, with free, prior, and informed consent for all developments on unceded territory.**

**Action: First Nations who choose conservation versus logging must be provided with other opportunities to grow their economy through fair and equitable funding.**

No viable options exist for First Nations who chose conservation versus logging. The Autonomous Sinixt have long opposed logging in their traditional territories. Pictured is Matriarch and elder Marilyn James.

Credit: Louis Bockner.



## 23 | BCTS Exaggerates its Economic and Job Contributions

BCTS claims to be a significant contributor to the economy and job creation in BC, but the evidence suggests otherwise, especially considering the broader impacts of forest mismanagement in the context of our changing climate.<sup>37</sup>

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 was 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% to 1.9% of jobs province-wide, or about 55,000 total jobs; a share that is steadily declining. The 2023 labour force survey cites that only 13,750 forestry jobs (0.47%) are “in the bush,” or as clarified on March 3rd 2025 by the Ministry of Forests are employed in the “harvest and land base aspect of the Forest Sector.” The rest of the jobs are in wood, paper and pulp mills and office jobs.<sup>38</sup>

SWL acknowledges the importance of these high-paying jobs, especially in rural communities. However transitioning away from clearcutting, developing more value-added local mills, and strengthening environmental protections in the Forests Act and Forest and Range Practices Act and regulations would create more sustainable jobs over time and increase the number of jobs per cubic metre, while substantially improving ecological outcomes.

The chart below from 2023 Destination British Columbia suggests how vital it is to our economy to keep British Columbia beautiful. Tourism accounts for an increasing \$9.7 billion of our



Figure 5. Destination BC Chart (March 2025).

<sup>37</sup> See David Broadland, “Forestry doesn’t pay the bills, folks,” Focus on Victoria, July 3, 2020 < <https://www.focusonvictoria.ca/issue-analysis/35/> >.

<sup>38</sup> See Industry Profile at WorkBC for Forestry, Logging and Support Activities [https://www.workbc.ca/industry-profile/forestry-logging-and-support-activities#industry\\_overview](https://www.workbc.ca/industry-profile/forestry-logging-and-support-activities#industry_overview)

GDP, while Forestry and Logging is a declining \$1.7 billion.<sup>39</sup>

The 2021 Modernizing Forest Policy in British Columbia<sup>40</sup> intentions paper laid out a comprehensive vision to reform the province’s forestry sector. However, as of 2025, many of its key commitments remain unfulfilled: Too much control in too few hands, declining jobs and mill closures, underutilized value-added sector, the need for greater economic resilience and the need for more universal public benefit from public resources.

**Action: Require the province to publish independent, regionally specific cost-benefit analyses of BCTS’s economic, social, and environmental impacts.**



Figure 6. The current (April 25 2025) Destination BC Chart which understates the significance of tourism versus extraction industries with an incorrect scale applied to the bar representing tourism.

## Where do BC’s trees go?

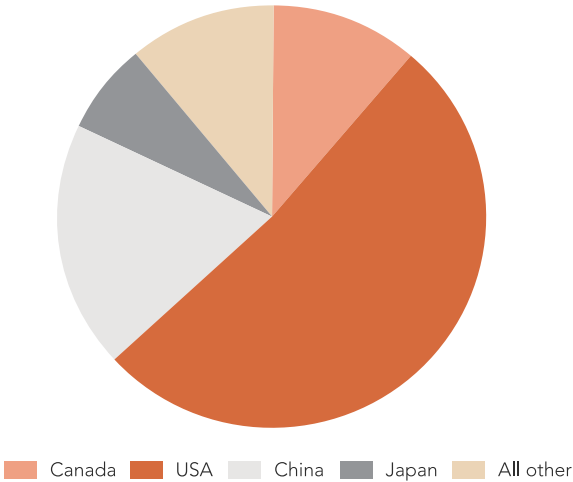


Figure 7. Do we really need to be exporting 85% of our forests?

## 24. BCTS Areas Need to be Included 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, a portion of BCTS-managed lands must be included in conservation efforts. Without this inclusion, we risk seeing vast areas of low ecological value — such as ice and rock in inaccessible high-alpine areas — 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.

<sup>39</sup> Destination BC <https://www.destinationbc.ca/who-we-are/the-power-of-tourism-bc/>

<sup>40</sup> See [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/competitive-forest-industry/modernizing\\_forestry\\_in\\_bc\\_report.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/competitive-forest-industry/modernizing_forestry_in_bc_report.pdf)

In 2023, tourism contributed 5.7 times more to the GDP than forestry did, and this disparity is likely to keep increasing.<sup>41</sup> This indicates how vital it is to keep British Columbia beautiful in order to safeguard and grow our province-wide and regional rural economies.



Mechanisms should be built into the Ministry of Forests to protect extraordinarily rare areas of high biodiversity like the proposed BCTS Oscar Creek clearcuts. But they just don't exist.

**Action: Mandate the inclusion of high-value BCTS-managed areas—especially primary and old-growth forests—in BC's 30x30 conservation targets and suspend logging in those areas immediately.**

<sup>41</sup> Destination BC <https://www.destinationbc.ca/who-we-are/the-power-of-tourism-bc/>

# Conclusion: Reclaiming the Public Interest in Public Forests

British Columbians are calling for a new era of forest stewardship—one rooted in ecological responsibility, public accountability, and long-term community benefit. The 24 actions outlined in this report offer a clear and achievable roadmap for reforming BC Timber Sales, the agency at the heart of so many of the province's forestry conflicts.

These reforms—whether environmental, economic, or structural—are urgently required. The government must end old-growth logging on BCTS-managed and other crown lands and mandate that BCTS operate under a genuine public-interest framework—one that places ecological integrity, climate resilience, and Indigenous rights on at least equal footing with timber volume targets. Any future iteration of BCTS must prioritize job creation, support Canadian-owned small and medium-sized businesses, and be a part of a broader restructuring of forest tenures across the province.

To Premier David Eby, Minister of Forests Ravi Parmar, and members of the BCTS review panel—Lennard Joe, George Abbott, and Brian Frenkel—we offer this appeal: listen broadly, not narrowly. By relying primarily on the voices of big industry and big labour, you are seeing only part of the picture. Conservation organizations, Indigenous governments, independent foresters, biologists, ecologists, hydrologists, and local communities bring essential knowledge and lived experience to this conversation. Without their inclusion, the solutions you pursue risk being incomplete—and ultimately ineffective.

This is a pivotal moment. Reimagining BCTS is not just possible—it is absolutely necessary. With courage, transparency, and inclusive leadership, the province can rebuild trust in forest governance and set a global example of what public forest stewardship in the 21st century can look like.

**The opportunity is before you.  
The time to act is now.**



The six BCTS clearcuts on the road up to Kokanee Glacier Provincial Park are particularly disturbing. They indicate that BCTS is increasingly logging contentious front country and ecologically important areas. The apparent failed silviculture in the top three of these clearcuts raise serious questions about BCTS's methodologies in an age of climate change.

# Reforming BCTS: Required Actions

|                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                             |                                                                                                                                                                                              |                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Legislate a public interest mandate for BCTS that holds ecological integrity, climate adaptation, and Indigenous rights with at least the same level of importance as timber volume targets.                                                                                                                                 | Require independent age verification for all proposed cutblocks containing suspected old-growth attributes before approval.                                                                                                                 | Shift BCTS's mandate to include binding requirements to protect biodiversity, water, and cultural values.                                                                                    | Require BCTS to conduct and report on cost-benefit trade-off evaluations addressing all FRPA values as part of transparent public engagement for proposed roads and cutblocks near populated areas, watersheds or recreation zones. |
| End internal approvals within BCTS. Require independent oversight for cutblock approvals and OGMA removals by non-BCTS Ministry staff.                                                                                                                                                                                       | The Ministry of Forests must first adopt internationally agreed upon definitions of primary forest. BCTS must then conduct and publish an inventory of remaining primary forest in its operating areas and prohibit logging in these zones. | Implement immediate moratoriums on logging in vulnerable and/or high-risk BCTS areas as a first step in demonstrating low-cost, high-impact reforms.                                         | When there is significant community opposition, to specific logging proposals, trade-off evaluations should be subject to third party independent review, in addition to First Nations consent.                                     |
| Tie BCTS logging approvals to performance metrics for ecological protection and community benefit—not strictly volume-based targets.                                                                                                                                                                                         | BCTS must immediately prioritize harvesting in the wildland urban interface (WUI)—but only according to best practices to reduce fire risk and increase forest resilience to wildfire and climate change.                                   | Require BCTS to halt approvals in landscape units lacking an implemented Forest Landscape Plan co-developed with and consented to by First Nations.                                          | Establish clear protocols for BCTS to engage First Nations governments transparently, with free, prior, and informed consent for all developments on unceded territory.                                                             |
| Mandate climate change adaptation planning and implementation for all BCTS operations, including assessments for hydrological risk, wildfire risk impacts on biodiversity, wildlife, and species at risk. Utilize BCTS operating areas for 3rd party research and monitoring of impacts and effectiveness of BCTS practices. | BCTS must immediately implement a ban on aerial spraying of glyphosate.                                                                                                                                                                     | Dissolve or restructure the Timber Sales Advisory Council to include representation from conservation groups, First Nations, and communities.                                                | First Nations who chose conservation versus logging must be provided with other opportunities to grow their economy through fair and equitable funding.                                                                             |
| Reform the Professional Reliance system by requiring external, arm's-length audits of BCTS forestry decisions as well as planning, practices, results and effectiveness.                                                                                                                                                     | Use BCTS managed lands for unbiased research on climate change adaptation and wildfire mitigation.                                                                                                                                          | Reform BCTS's auction model to prioritise local economic benefits and truly reflect the ecological costs, including the costs of remediation, recovery and any penalties for poor practices. | Require the province to publish independent, regionally specific cost-benefit analyses of BCTS's economic, social, and environmental impacts.                                                                                       |
| BCTS must immediately spatialize OGMA's in their tenure areas based on current forest inventory data.                                                                                                                                                                                                                        | BCTS must update silviculture guidelines using more deciduous regrowth, lower stocking standards, and plan fire breaks using deciduous forest.                                                                                              | Introduce a tiered bidding advantage or points-system for small-scale, value-added processors committed to job creation and sustainable practices.                                           | Mandate the inclusion of high-value BCTS-managed areas—especially primary and old-growth forests—in BC's 30x30 conservation targets and suspend logging in those areas immediately.                                                 |
| Broaden the scope of the BCTS review to include ecological science, public interest, and Indigenous leadership—not just economic outputs.                                                                                                                                                                                    | BCTS needs to abandon SFI entirely and apply to be certified by FSC. The government must define "sustainable" for themselves and audit themselves ongoingly for adherence.                                                                  | Use BCTS reform as a legislative pilot to implement province-wide forest policy changes—including tenure reform, biodiversity safeguards, and Indigenous governance frameworks.              |                                                                                                                                                |

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A photograph of a forest scene. In the foreground, a red-breasted sapsucker is perched on a tree branch, facing right. The bird has a bright red head and back, with black on its wings and tail. The background is a dense forest of evergreen trees, with sunlight filtering through the canopy, creating a dappled light effect. The overall tone is natural and serene.

*"BC Timber Sales plans to auction timber licence TA1375 on Vancouver Island, near the Tsitika Mountain Ecological Reserve, in late summer of 2025. The licence targets ancient forest (400+ years old) identified for deferral under the Old Growth Technical Advisory Panel. This rare ecosystem—undisturbed for millennia—contains Oldgrowth Specklebelly Lichen, a species listed as of special concern by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), and almost certainly many yet-undiscovered species. The decision reflects a troubling pattern of prioritizing logging over ecological integrity and public trust."*

**Joshua Wright,**  
forest policy advocate and expert  
in ground truthing who has  
documented the coastal regions  
of Canada and the US since 2018.

# About the Save What's Left Conservation Society

**The Save What's Left Conservation Society is a grassroots, volunteer-driven organization with a mandate to protect what remains of British Columbia's old growth and natural primary forests.**

Incorporated as a non-profit society in 2024, the organization embraces educational, research and advocacy tools with a current focus on achieving province-wide reform of the BC Timber Sales division of the Ministry of Forests (BCTS) — the provincial government's timber extraction agency.

By holding BCTS and the provincial government accountable, Save What's Left aims to drive broader change across the forestry sector — including economic reforms — to ensure sustainable and responsible forest management throughout British Columbia for present and future generations.

We welcome your feedback on this discussion paper: [savewhatsleft@proton.me](mailto:savewhatsleft@proton.me).





SAVE  
WHAT'S  
LEFT

