

Prepared for the Honourable Ravi Parmar, BC Minister of Forests

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Detailed Commentary on 54 recommendations made by the BCTS Review Panel

NOT GOOD

Recommendation 1:

"Develop a model for BCTS to operate at arm's length from government, to provide operational independence and partnership. Operating as a business allows for greater flexibility, enhanced decision-making authority, efficiency, and broader partnership opportunities."

This appears to suggest privatizing or turning BCTS into a Crown Corporation. BCTS is under attack right now from the public and it knows it. Economically viable trees in the backcountry are mostly gone in BCTS operating areas, therefore, to increase volume harvested by 50% (see recommendation #17) they will be logging community watersheds, front country and OGMA's. The only way they will be able to ramp up BCTS logging in these contentious areas is if there is less scrutiny from the public.

Recommendation 11:

"Review the BCTS Business Area structure to achieve business efficiency."

Any changes to BCTS operating area should be viewed with suspicion. For example, the Ymir Watersheds Quartz Creek BCTS operating area was turned over to ATCO when things got too hot for BCTS. We still don't know the story of what happened there, and how ATCO became the beneficiary of a significant increase in their tenure at the expense of BCTS.

Recommendation 16:

"Create a strategy, in collaboration with First Nations, local communities, and industry partners, to advance the efficient and sustainable use of all available fibre and build a standing inventory equivalent to 24 months of Annual Allowable Cut."

This is very concerning. Ultimately, taxpayers will be on the hook for the costs of carrying this inventory – which would be extraordinarily expensive. This would be yet another huge industry subsidy.

Recommendation 17:

"Establish provincial volume sales targets of a minimum of 6 million cubic metres in 2026, increasing gradually to 7 million in 2027, 8 million in 2028, and 9 million by 2029."

Increase BCTS logging by 50% by 2029! This makes absolutely no sense economically let alone ecologically. The US buys over 50% of BC's lumber and trees (Canada only consumes 15%!) and sales to US are plummeting and really have no hope of rebounding because:

- US housing starts are down
- the US has declared war on its national forests
- and of course the tariffs which are unlikely to ever come down, even with regime change in the US, because we are subsidizing our forest industry so much and not even coming close to accounting for the real costs (BCTS likely runs at a loss, and MOF is only marginally profitable.)

Recommendation 25:

"Develop a plan for identifying and enabling the sale of low-value stands, in collaboration with First Nations and industry, to aid in stand recovery and fibre flow. In addition, create cross-Business Area teams that can help achieve this."

This is going to mean more FESBC taxpayer-funded subsidies for an industry that already doesn't stand on its own two feet. FESBC hands out literally hundreds of millions in subsidies annually - most of those subsidies benefit multinationals like Drax, Kruger, and Mercer. Let's talk Mercer for a second as an example. FESBC

(taxpayers) are massively subsidizing transportation of pulp loads from the Okanagan in the West and from as far away as the Crowsnest Pass area in the East – 10 hours round trips. A pulp load sells to Mercer for \$1500 at the scale in Castlegar. Trucking costs for those big rigs run at least \$200/hr. My math tells me 350 litres of diesel minimum to make this round trip. But what is even worse is these subsidized pulp shipments are causing a lot more waste wood to be left in blocks closer to Castlegar. This information comes from TWO different loggers I know – it drives them crazy. I have done a lot of research of FESBC subsidies. There is no accountability. They are not bound to answer any questions nor do they have to respond to FOI requests. I also spent half an afternoon sleuthing online about subsidies Mercer received. I found evidence of \$60 million in subsidies since 2010 – that works out to over \$10,000/year for the past 15 years for every one of their 390 employees.

<u>Recommendation 27:</u> "Develop a collaborative plan with First Nations and industry on access to high value but remote stands (isolated timber)."

This is highly concerning. High economic value usually means high ecological value. These areas must be left alone. See very important points made regarding recommendation #2 and First Nations below.

Recommendation 38:

"Where feasible and where spatial interests align, work with BC Parks, the BC Wildfire Service, and First Nations to actively manage wildfire risk adjacent to and within BC Parks."

When I met with Ken Kalesnikoff almost one year ago in his boardroom, he made it clear he thought we needed to log in Parks, specifically saying how much better off Manning Park would be if all beetle-killed Fir etc. were logged off. 98% of the logging that happens on Crown land is still clearcutting. The agenda of logging in Parks was repeated at the showing of BC is Burning around the province, where in the local showing, the highest ranking MOF staff person in the Kootenay Boundary area, Russ Laroche, was actually one of the two presenters of the film (introduced as a presenter.) I have read "Smokescreen" by Dr. Chad Hansen which outlays how the fear of wildfire narrative has been used by the logging industry in the US for the past 30 years to get away with what they otherwise wouldn't be able to. This recommendation is clearly aimed at gaining the social license to log in provincial parks. It is very important to understand that with lumber pricing plummeting, the only way the industry can keep going is with easily accessed timber – where they don't have to pay for expensive roadbuilding into new territory. The forestry industry recognizes that they need to be logging OGMA's and Provincial Parks if they want to sustain or increase current timber harvesting volume – the trees need to come cheap or they won't sell. They are seeking to be the hero saviour in a problem of their own making.

Recommendation 44:

"Collaborate with First Nations, the Forest Enhancement Society of BC, and licensees to enable expedited wildfire salvage and return lands to healthy growth and productivity."

This is scientifically inaccurate in most cases. Nature takes care of herself very well and natural recovery is by far the best recovery in most cases. As it says in Public Forests, Public Trust, vetted by a wide array of forestry industry professionals:

"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 instead of 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."

Think about it: In a fire dominated landscape like ours in the Kootenays, so many species are dependent on areas AFTER wildfire. This is normal. The book Smokescreen tells us of various studies showing that a year or two after even high intensity fires, there was often more wildlife in the naturally regenerating forest than there was in the forest prior to the burn.

Recommendation 49:

"The Province should enhance coordination across ministries, agencies, and regulatory bodies to address complex initiatives that are currently restricting fibre access. New initiatives should be introduced and implemented in an approach that provides a transition period for industry and aligns forest sector needs with broader land management goals."

Ecosystems, by their very nature, don't operate in a vacuum. And neither should a Ministry of Forests so clearly captured by industry. We know that the Minister of Water, Land and Resource Stewardship has not even been tasked with working on 2023 Biodiversity and Ecosystem Health Framework. This recommendation is essentially asking for capitulation to meet their needs above other needs such as ecological protections.

CONCERNING AND OF NOTE:

Recommendation 20:

"Identify and develop opportunities on non-provincial forest lands."

It would be good to get clarification around what this means – with examples.

Recommendation 30: "As part of practicing multi-generational forest stewardship to support wildfire risk reduction, forest health, range rehabilitation, fibre utilization and other public interest objectives, adopt innovative and advanced, multi-phased harvesting approaches that support partial harvesting and commercial thinning."

While a step in the right direction, consider then if vast amounts of timber harvesting is moved to partial harvesting, the land base required to meet the same harvest volume goes way up – with devastating consequences for the environment, watersheds, climate change etc.

Recommendation 52: "In collaboration with First Nations, implement a 10% volume recovery mechanism on replaceable tenures sold through the open market, with recovered volume reallocated to BCTS to enhance public timber marketing and ensure broader access to forest resources."

This is interesting and deserves further exploration.

POTENTIAL OF BEING GOOD:

Recommendation 2:

"Modernize and restructure BCTS to cultivate stronger partnerships with First Nations, in a manner that better reflects the intent of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and enhances collaboration and shared decision-making."

100% agree in principle. Public Forests, Public Trust explains the complex relationship between Nations, Government and conservation.

"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 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."

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

Recommendation 6:

"In consultation with First Nations, industry and auction experts, evolve BCTS into a full-service "auction house, offering a broader suite of services such as on-site or roadside chipping and grinding, log trading, auctioning developed timber, bundling timber sales with harvesting and site rehabilitation services, and operating a virtual log market."

These could be useful additions to BCTS services, though the beneficiaries should be aimed at small businesses that could be the backbone of a healthy and actually sustainable forestry industry. Note that the auction-based model is highly questionable in this day and age where they US has won in the courts proving that BC does subsidize their lumber – it's time has passed.

Recommendation 22:

"Update the eligibility criteria for Category 4 sales to include custom cutters and processors who operate using facilities they do not own, subject to their showing consistent use of fibre."

Way overdue.

Recommendation 23:

"Ensure that a portion of volume is available to untenured and/or minimally tenured value-added operators—particularly mid-sized operators with an annual allowable cut in the general range of 10,000 to 300,000 cubic metres."

Good on the smaller side of the scale but worrisome on the upper end of the scale – to put in perspective, 300,000 cubic metres is 7,500 logging trucks per year or 29 logging trucks per weekday, year-round. Midsized???

Recommendation 24:

"Explore ways to grow volume in the Category 4 program through partnership and volume acquisition." Way overdue.

Recommendation 29:

"Transition BCTS from a volume-based model of forest management to an area-based approach to enable multi-generational forest stewardship through practicing full rotation management." Way overdue.

Recommendation 43:

"Reserve a specific volume and profile of the stand inventory from identified TSLs on certain Category 1 sales for reauction to the value-add sector to support very small value-add producers and where a local need is identified."

This would be a huge step in the right direction, though "local" is needed everywhere and can be built over time with the right programs – for example partnering with Community Futures.

Recommendation 45:

Expand the opportunities for Community Forests to develop and market their forest tenures through the BCTS auction system, where desired by both parties."

Absolutely a positive step. BUT there MUST be guardrails on Community Forests as well. Ben Parfit from the Tyee did an exceptional recent (July 25 2025) piece of investigative journalism on problematic Community Forests: "BC Wants Value-Added Mills. We Discovered a Big Obstacle Why does so much community forest timber end up as wood chips instead of higher-end products? A Tyee investigation." This article points to a Valemount community forest that was shipping old growth cedar to be pulped, when a family run value-added cedar mill in their community couldn't get trees to mill (and other like stories.)

https://thetyee.ca/News/2025/07/25/BC-Value-Added-Mills-Big-Obstacle/

Recommendation 47:

"To complement and reinforce the recommendations already made throughout the BCTS review, the Province should explore new approaches to pricing fibre that better reflect the evolving realities of forest management in British Columbia. This includes incorporating stewardship incentives and other government objectives, more accurately pricing diverse types of fibre, and building flexibility to reflect local market conditions and fibre quality."

The auction-based model, originally set up to try to prove to the US we don't subsidize our forestry industry, no longer makes any sense. We've lost that battle. So it is absolutely a good idea to look at other pricing models – but those new models must the 21st century ideals of conservation, watershed protection etc. The math has to work. Right now it doesn't even come close.

Recommendation 48:

"The Province should develop and implement a more strategic, coordinated approach to investing in the forests of tomorrow, prioritizing long term forest health, climate resilience, and economic opportunities while ensuring that efforts are aligned across ministries, agencies and partners. This approach should be informed by meaningful conversations with First Nations, local communities and industry, and should integrate local priorities into decision making." Absolutely. But understand that in forestry circles, industry is crying out for more local decision making because they want to use that to circumvent what should be province-wide environmental protections of things like areas of importance to Nations, OGMA's, watersheds and recreational areas.