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Old Growth Order Review
Resource Planning Branch
Ministry of Sustainable Resource Management
P.O. Box 9373 Stn Prov Govt
Victoria, B.C. V8W 9M3
January 9, 2004

Dear Sir or Madame,

Re/ Public review of proposed Old Growth Order

Preface:

The Sunshine Coast Conservation Association (SCCA) is an umbrella organization of 26 member groups that promotes the protection of biodiversity in the Sunshine Coast Forest District (SCFD). Our association supports the implementation of landscape unit (LU) planning as one necessary element of a biodiversity conservation strategy. We have previously participated in and reviewed several LU plans including the Bunster, Chapman, Howe, Sechelt and Skwawka LU plans. In general, landscape unit planning is more advanced in this district than anywhere else in the province.

There are three background considerations of note affecting the protection of biodiversity in the SCFD and the proposed Old Growth Order;

- The Protected Areas Strategy established protected areas in the SCFD covering less than 3% of the land base,
- In most of the landscapes of this district there is a severe shortage of old growth inventory in the low elevation ecosystems (CDFmm, CWHxm and CWHdm) and also occasionally in mid-elevation ecosystems (CWHvm),
- There is a large number of red and blue listed species and plant communities present in significant occurrences in this district.

Positive aspects:

Our association is pleased to see government acting in support of landscape unit planning. It appears that the Old Growth Order gives policy direction to those licensees that have previously declined to be actively involved in LU planning. Considering that LU planning has been largely delayed for the last ten years, this is a positive development. As well, it is apparent that the order will support district

managers in refusing to approve logging in old growth deficit areas where LU plans have not been completed. We view this as a very positive turn of events.

Concerns:

There are several aspects of the Old Growth Order that are of significant concern. The statement that the order will not affect previously approved logging is regressive. During the long period of LU planning delay, there was an adverse incentive for licensees to propose logging in deficit areas as it has been obvious in these situations which low elevation stands would be required to achieve the minimum targets for old growth retention. Consequently these stands have accumulated excessive numbers of category A approvals. We believe that government should maintain and exercise the right to overturn category A approvals where conflict will otherwise prevent minimal levels of retention from being achieved. Exercise of this right would provide a positive incentive for licensees to achieve the minimal targets for retention of old growth resources and tend to protect the long-term interests of both stakeholders and the public.

We note that there is a new policy in the Old Growth Order that relates to retention targets in medium and high biodiversity emphasis option (BEO) landscape units. This policy allows for old growth targets to met, with up to 20% of the target, from recruitment stands that do not qualify as old growth. Recruitment strategies are appropriate where options to maintain recommended minimums have already been lost. Where inventories still retain sufficient old growth to meet the recommended minimums there are no scientifically justifiable reasons to allow a further draw down to occur. These medium and high BEO landscapes are among the most economically and biologically productive systems on earth. As such, these old growth stands are a priceless resource of irreplaceable significance to the public and all stakeholders. We urge government to delete this provision from the Old Growth Order.

Purpose of LU planning:

The original purpose of LU planning was to provide a "coarse filter" strategy for the protection of biodiversity within the context of the managed landscape. The long term benefits of this strategy to the public and to industrial stakeholders has been very well established in research and reflected in public policy. Do the current policies directing implementation of LU planning protect sufficient old growth to adequately manage and conserve this level of biodiversity protection?

Our association is of the opinion that the existing body of policy, including the proposed order, is not sufficient to provide an effective course filter system for the protection of biodiversity as it can only protect small scattered and unconnected areas of old growth. One policy in particular deserves reconsideration by government; the policy allowing for old growth inventories in the low BEO landscapes to be drawn down to one-third of the originally

recommended targets. This policy adversely affects 45% of the landscapes of the province and effectively negates any claim to scientifically adequate management and conservation of this fundamentally important resource.

Short term implications:

There are short term as well as long term implications to current provincial old growth policy. The long term effects are obvious but we would like to draw your attention to short term effects. Over the last ten years various certification systems have been established to provide independent verification of sustainable practices. These certifications are rapidly becoming essential tools for BC licensees seeking to maintain market share in the global economy. One of the most important issues for certification performance auditors to assess relates to the treatment accorded to high conservation value forests in the areas of a clients operation. The current trend is for certification systems to require more protection of these high conservation value forests (and of species and plant communities at risk) than can be achieved under BC's landscape unit planning policies. The implication is that regressive policy from government regarding old growth protection will eventually cause a loss of market share for BC licensees. Ultimately, an independent certification system can not accept a failure of government policy as an excuse for a company selling forest products in the global market place. Perhaps an example will serve to illustrate the situation.

Certification Challenge:

In June of this year the SCCA filed a complaint against International Forest Products with the Sustainable Forestry Initiative and the ISO 14001 program. The challenge sited a large number of logging approvals in old growth deficit areas and in the habitat of species recognized as at risk. The SCCA alleged that Interfor's Environmental Management System (EMS) lacked goals and objectives and was not operational or reasonably functional. Subsequently, KPMG (performance auditors) made a finding of non-compliance on several points. It appears that Interfor's EMS was overly dependent on the will of government to act in regard to old growth forests and the habitat of forest dependent species at risk. Currently, Interfor is under investigation by the Sustainable Forestry Board in Arlington, Virginia.

Ethical considerations:

One other issue of note in regard to the sustainable use of old growth resources. The professional discretion of BC's Registered Professional Foresters (RPF) has been recently enhanced by revision of the Foresters Act and adoption of new Standards of Professional Practice (which compliment ethical standards) by the Association of BC Professional Foresters (ABC PF). Foresters are now obligated to their professional association to achieve standards of knowledgeable and sustainable practice. This is the basis of an RPF's relationship to the public

(owners of the resource). In our view, any forester proposing forest development in the old growth component of a deficit BEC unit is vulnerable to discipline through the complaint process of the ABCPF.

Recommendations:

1. Maintain the right of government to overturn category A approvals in old growth deficit situations,
2. Delete from the Old Growth Order provisions allowing for recruitment of younger age stands to serve as old growth representation where sufficient old growth inventories exist to meet the FPC retention targets for mid and high BEO landscape units,
3. Amend the Old Growth Order to disallow draw down of old growth inventories to 1/3 of the retention targets in the low BEO landscape units,
4. Insure that provincial government policy does not prevent licensees from achieving and retaining certification,
5. Insure that provincial government policies do not conflict with the ethical obligations of BC's Registered Professional Foresters.

Thank you very much for this opportunity to express our concerns with the proposed Old Growth Order.

Yours truly,

Daniel Bouman, Executive Director
Sunshine Coast Conservation Association