

January 16th, 2018

The Honorable George Heyman
Minister of Environment and Climate Change
By email: CitizenEngagement@gov.bc.ca

RE: Submission to Professional Reliance Review

Dear Minister Heyman:

As a guide outfitter in British Columbia, I believe that the BC Government's move to the professional reliance model over the past decade has failed to achieve its full potential, allowing gaps that leave our wildlife, watersheds and ecosystems vulnerable. I'd like to see a province with healthy ecosystems that support abundant big game populations for all to enjoy. As a passionate advocate for wildlife, my interest is in issues that promote conservation, stewardship, and sustainable use of our valuable natural resources.

From my perspective, the professional reliance model has not worked to preserve the multitude of other non-timber values, resulting in an ecological disaster for many parts of our province. Therefore, I agree with the recommendations of the Auditor General and the Forest Practices Board, which point out the need for clear objectives that include planning for multiple values in the public trust. We must not simply manage the provincial landbase for maximum timber yield while managing all other values to the bare minimum.

Some specific concerns I have:

- It appears that many Registered Professional Foresters (RPFs) have forgotten that their mandate is to "serve and protect public interest" and promote "good stewardship of forest land based on sound ecological principles."

- The majority of RPFs are simply not getting out on the ground, often delegating this “grunt” work to junior staff, and simply putting his or her name to the work without ever setting foot on the ground.
- The goals of forest licensees often directly conflict with other resource values. Therefore, RPFs are put in a position of conflict of interest as they are faced with the moral dilemma of doing the right thing or risk losing their job.
- There has been a noticeable transition from a RPF managing all values to only managing timber values. (Note that many companies are now referring to RPFs as “Fiber Mangers.”)
- There are no consequences of lying to, or failing to contact, stakeholders affected by timber development activities. Within some licensees this is commonplace behavior.
- There is a lack of meaningful engagement with stakeholders. In the rare instance when there is stakeholder engagement, it is often after the cutting permit has been issued. This renders all engagement to a meaningless “box checking exercise” as the cutting permit has already been issued.
- Lack of authority for District Managers. The role of District Managers (DMs) has become that of a signature. DMs are required to sign off on cutting permits if licensees have met all requirements – even if it is not in the best interest of the public.
- Under the current system, RPFs are making land management decisions that affect multiple resource values, not just timber. Despite often having very little (if any) biology background, RPFs are making decisions for wildlife, including species at risk.
- Multiple licensees operating on the same landbase under volume-based tenures equals a race to cutting permit. Because there is currently no incentive for proper land management; if one company leaves timber, the next one will take it.

- Unprecedented rate of change on the landscape with no higher-level planning requirements. Forest Stewardship Plans (FSPs) have been proven inadequate as a higher-level planning tool. Timber Supply Reviews (TSRs) are not effectively including other values. Instead, why not Resource Supply Reviews that includes all values?
- Timber Supply Areas (TSAs) – the very name suggests that they are only managing for timber, which is currently the case.
- The public comment period on TSRs, FSPs, etc. are inherently flawed. They pay lip service to including the public in the process, when in actual fact, they have not been. The public may comment, but never gets to see how their comments were (or even if they were) addressed. FSPs contain no spatial information and are of no use to the public or other stakeholders.
- There is a total separation within the BC Government between the Wildlife and Forestry departments. How can we possibly achieve proper integrated resource management when Forestry, Ecosystems, Fisheries, and Wildlife are operating as individual organizations?
- The Forest Practices Board (FPB) has very little power to correct improper practices. Despite outlining serious problems with the current system over the last decade, most of FPB's recommendations have been ignored by Government and industry. It is easy for licensees to be compliant with regulations when the bar is set so low.

There are no easy answers to these problems, but if the government cares about BC, they must be fixed. As a guide outfitter, my clients come from around the world, dreaming of a once-in-a-lifetime experience in one of the most beautiful, pristine counties on earth. In the past, that was the exact message I got back from them. However, the clear message I hear now is how appalling they find Canada's logging practices to be, and an utter disbelief that forest companies can harvest timber in this fashion.

I would like to see legislative changes that bring resource extraction practices, planning, and oversight back under provincial management with meaningful engagement from all stakeholders.

Yours sincerely,

Bradley Bowden

Cariboo Mountain Outfitters