

Professional Reliance in BC
Why it isn't working as enabled and intended by FRPA
with recommendations for change

Presented to:

George Heyman

BC Minister of the Environment

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ABSTRACT

Over the past 20 years the province's resources have been shamelessly exploited with inordinate and very negative environmental impacts that threaten the very well-being of these resources and the people of BC.

This proposal envisions a compendium of proactive policy proposals that the government will adopt, in whole or in part, as they chart a new and very positive direction for the management of British Columbia's abundant natural resources. Several examples are included herein.

Everything in nature is connected and what happens in one sector affects all other sectors. The several policy proposals recognize this connection and provide excellent opportunities and directions that, if taken, will ensure a healthy and beneficial future for both the environment and resources involved and, of course, for all the people of British Columbia and Canada.

Several of the proposals relate to and support partially developed or recently abandoned ventures; these include, for example, full implementation of the Road Resource Act, the Water Sustainability Act and the Cumulative Framework pilot projects, reinstatement of the Zero Net Deforestation proposal and the development of a Comprehensive set of Resource Policy Objectives for BC.

Current legislation related to resource management, development and allocation is very complex, almost completely isolated and hence not complementary or hierarchical. All resource-related legislation must be changed so it is well coordinated, complementary and hierarchical. For example water quality and quantity and hence the Water Sustainability Act should reign over other resource-related legislation as, without clean, abundant water nothing can survive.

Other proposals chart a multidisciplinary but well-coordinated path to a regime sustainable resource management that recognizes past mistakes and deficiencies and corrects these in a proactive manner. These proposals provide inherent solutions to the underlying problems arising from the FRPA paradigm, the main one being that bare-minimums are not only accepted but encouraged.

The recommended solutions to address the underlying problems of FRPA that thwart the attainment of the desired and expected Results are:

A. Change the inherent nature of the legal and administrative regime related to natural resource management in BC via more clearly stated objectives with improved definitions and clarification of the desired Results encouraged by:

B. Developing and Implementing an Incentive-Based Approach that recognizes and supports the use of effective management strategies that achieve the desired and expected Results; Results that are well above the legal minimums.

Introduction and Background: The concept and principle of relying on resource professionals to manage BC’s natural resources in an exemplary manner is, in many respects, a sound approach. The NDP developed and implemented the Forest Practices Code to achieve this goal, albeit by a detailed compendium of Guidebooks. These Guidebook provided very prescriptive methodologies relative to how operational aspects of resource management were to be conducted. There was general agreement that the Code did improve the quality of forest-related resource management across BC.

However, many professionals and forest industry entities strongly objected to the prescriptive nature of the Code and lobbied for a much greater degree of “Freedom to Manage” to be granted to all resource managers.

The Liberal Government agreed and via a variety of new legislation enabled this to happen. The main Professional Associations involved with resource management (the ABCFP, CoAB and the BCIA) all were given legal backing to change their Acts and Bylaws giving them enhanced authority to police their own members. The intention of this legislation was to enable the Associations to direct and police their respective members instead of the government doing this.

And, via FRPA, instead of detailed prescriptive approaches to achieve improvements in resource management, the approach would be for government to define expected and hopefully improved RESULTS that resource professionals would achieve, with considerable leeway via a greater degree of freedom to manage the resources. It was also hoped and expected that such freedom would stimulate new and much improved resource management results.

Hence the change from a very prescriptive, how-to approach to a results-based approach was enabled. The new approach was based on the premise that excellent resource management across BC would be more easily and better achieved via a Descriptive Approach rather than a Prescriptive Approach.

However, the expected and desired improvements achieved over the entire FRPA era extending over the past 13 years have not been realized. As per the Terms of Reference for Mr. Heyman’s review the Results achieved have been far from satisfactory; in a very diplomatic way they state:

“Since 2013, the Environmental Appeal Board, Forest Practices Board, Office of the Auditor General, the Office of the Ombudsperson and other organizations have investigated how well the PR model performs the requirement to provide independent, objective advice to government regulators. These investigations highlight the need for adequate oversight of QPs. There has also been public concern related to some specific instances of decision making based on PR.”

PART 1
The problems and why they exist

Why FRPA has failed to deliver the desired and expected RESULTS¹

- A. **There are flaws in the system that, although well-intentioned, inherently subvert the achievement of the desired and expected results.** These flaws permeate the entire spectrum of natural resource management in BC. They extend from the relatively simple designation of the administrative units in BC as Timber Supply Areas (TSAs) through the Timber Supply Review process and the subsequent operational plan templates (i.e. FSPs and WLL Plans) that indicate how the determined AACs will be harvested and associated resource values managed---to achieve the stated RESULTS.

The system portrays a strongly focused administrative regime that has, as its central focus, the harvest of as much timber as ‘reasonably?’ possible for as long as possible, i.e. to maintain the AAC ad infinitum. It also transfers an inordinate amount of control over the management and allocation of BC’s forest resources from the government to the forest companies that helps ensure their success.

Four examples are provided: ²

- 1. The Chief Forester’s Leadership Team.** It is highly inappropriate for the BC Government to invite all the Chief Foresters of the big forest companies in BC to join such a ‘team’ and then ask it to develop and guide the government on forest-related policies.
- 2. The designation of TSAs (Timber Supply Areas) instead of Natural Resource Areas.** Is a reflection of the timber dominance; all of BC has been geographically and administratively divided into TSAs whereas they should be renamed and referred to as Resource Management Areas..
- 3. Throughout BC FRPA limits the amount of timber that may be set aside for other resource values** such as Wildlife Habitat Areas via the clause that such actions must not “unduly affect the timber supply”. Obviously, under FRPA, wood extraction rules over other resource values!
- 4. There are flaws in the Operational Plan Templates** as they lead and encourage the licensees to accept the lowest management parameters possible and virtually all do this, with some even striving for less.

¹ Expanded Rationale statements supporting all of the comments and recommendations presented herein are available from the author upon request. Contact info is: 250-445-6496 e-mail: fmarshall@xplornet.ca

² See Appendix (same numbers) for expanded versions of these and several other examples with relevant recommendations.

B. The entire FRPA regime relies on Professional Reliance, supported by encouragement, exhortation, expectations and, at times, coercion of Licensees via C & E activities to achieve the stated results---results which are the minimum acceptable to government. To date this regime has failed to achieve the requisite level of success even as minimally defined.

Why so? Since the beginning of human life, it has been well known that everyone, including individuals, companies, societies, organizations etc. all respond, willingly and favorably, to rewards whether they be tangible or intangible. This behavior is an inherent part of human nature and yet FRPA completely ignores this. And now Mr. George Heyman is leading an investigation into why the Professional Reliance model under FRPA has failed. As above and outlined below, the reasons are quite obvious.

Under FRPA there is absolutely no reason or incentive for any of the Licensees to produce excellent results let alone any above the bare minimum. Therefore they don't.

See Appendix # 21 for a relatively detailed prototype of what an incentive-based system for achieving excellence in resource management across BC could look like. If implemented, this system would change the essence of natural resource management in BC that would achieve Results well above the minimums required.

APPENDIX
Part 2

CHANGING THE FRPA PARADIGM

The Solutions to the FRPA Paradigm are outlined below.

As everything in nature is connected, what happens in one resource sector affects all others. Everything in the legislative regime in BC is similarly connected. To overcome the problems and barriers that exist in the legislative regimes in BC, a multidisciplinary approach with attendant interconnecting aspects must be adopted. A piecemeal approach will certainly fail.

In this regard the changes made should be comprehensive, proactive, futuristic, well-coordinated and equitably applied to all resource sectors. A relatively cautious approach to achieve this task should be adopted starting with the smaller items and working up to the larger ones which will necessarily take longer to implement. Achievement of the smaller ones will set the framework and ease the path for development and implementation of the larger ones.

Adoption of the recommended proposals will support and enhance an administrative and legal regime wherein Resource Professionals are provided with improved opportunities with considerable “Freedom to Manage” the natural resources of BC.³

The solutions presented address the flawed FRPA paradigm and the lack of incentives to encourage the realization of Results above the minimum required. They are:

- **A. Change the inherent nature of the legal and administrative regime related to natural resource management in BC with more clearly stated objectives (improved definition of the desired Results) encouraged by:**
- **B. Developing and Implementing an Incentive-Based Approach that recognizes and supports the use of effective strategies to achieve the desired and expected Results; Results that are well above the legal minimum.**

A program that will encourage and stimulate all resource industries and related professionals to achieve results well above the prescribed minimums.

³ See statement on “Freedom to Manage” in Part 2

APPENDIX

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Introduction:

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Adoption of the proposals contained herein will promote and support and enhanced climate wherein the Resource Professional of BC are provided with improved opportunities to have considerable “Freedom to Manage” the natural resources of BC.

The solutions presented address the flawed FRPA paradigm and the lack of incentives to encourage the realization of Results above the minimum required. They are:

- **A. Make a change in the inherent nature of the legal and administrative regime related to natural resource management in BC with more clearly stated objectives (improved definition of the desired Results) encouraged by:**
- **B. Developing and Implementing an Incentive-Based Approach that recognizes and supports the use of effective strategies to achieve the desired and expected Results; Results that are well above the legal minimum.**

Changing the FRPA Paradigm (Sections 1-20)⁴

- 1. Disband the Chief Forester’s Leadership Team.** It is highly inappropriate for the BC Government to invite all the Chief Foresters of the big forest companies in BC to join such a ‘team’ and then ask it to develop and guide the government on forest-related policies.

If such a group is to be formed it should be made up of appropriate representatives of all relevant resource sectors. As noted above, what happens in one resource sector affects all others and hence the related and cumulative impacts

⁴ Supporting rationale for all of the proposals contained herein are available upon request from the author.
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associated with all operations in any and all areas should be well planned and properly considered and coordinated.

The Forest Leadership Team, by its very nature, is focused very narrowly on forest-Related issues and seldom, if ever, crosses jurisdictional boundaries by inviting other resource sectors to participate.

The Forest Practices Board in the above mentioned FREP report stated that:
“Government has relied on professionals to voluntarily make changes to their practices based on FREP’s results, even when this demands reconciling broad social and economic considerations with environmental considerations. As stated many times previously, the Board believes that this is the role of government.”

- 2. Change the designation of TSAs (Timber Supply Areas) to Natural Resource Areas.** Such a change would appropriately recognize that these large geographic areas comprise the full compendium of BC’s natural resources with all managed equitably. Also, all Forest Districts are now Natural Resource Districts so the nomenclature referring to their land-bases should be consistent and complementary

In BC, and in many respects throughout the world, timber has long dominated the scene across the landscape, geographically, economically and politically.

As a reflection of this dominance all of BC has been geographically and administratively divided into TSAs. Such name inherently implies the dominance of timber as the most important resource. This is further strengthened by the Timber Supply Review processes which, ‘consider’ other resource values but focus primarily on the timber supply.

Throughout BC FRPA limits the amount of timber that may be set aside for other resource values (e.g. Wildlife Habitat Areas and Visual Quality Objectives) as such set-asides must not “unduly affect the timber supply”. Obviously, under FRPA, wood extraction via approved forestry practices still rules over other resource values! This must change.

The Association of BC Forest Professionals recently developed a new Guidance Paper—“**Principles of Forest Stewardship**” for its members. Notwithstanding its title, this paper inherently speaks to all forest resources as per the following definitions which are included therein:

“Forest Resources: *The tangible and non-tangible components of the forest ecosystem which humans may use or consume, including trees, forest plants, herbs,*

mushrooms, berries, wildlife, scenic views, old growth, etc. Forest resources may be harvested, maintained, enhanced or protected for current or future use.

Forest Stewardship: *Forest Stewardship is the responsible use of forest resources based on the application of an ecological understanding at the stand, forest and landscape levels, and based upon an ethical responsibility to the land and people.”*

A more appropriate title for this paper would be “**Principles of Resource Stewardship**”.

Minerals are also held in high regard by the Provincial Government. For example, mining companies are exempt from FRPA legislation which allows them to operate in a manner that would be illegal under FRPA. Recently the government restricted the Forest Practices Board oversight over the Oil and Gas industry. Mining obviously rules over environmental considerations and regulatory oversight.

Comments: The TSA term should be changed to RMA (Resource Management Areas). The boundaries of these new areas could and should better reflect the many resource values present on the landscape and the administrative structure overseeing them. Such change would complement the new MFLNRO administrative regime which is still under development. The timing therefore is very opportune for such name and area changes.

This approach would provide a more comprehensive focus and opportunity for improved resource stewardship for all resources; for example, such a name and supporting structure would better enable the determination and recording of the cumulative impacts of all aspects of resource management and development on and across the landscape.

Such name change and designation is long overdue and it should be implemented immediately.

- 3. In line with the above, amend FRPA by deleting the qualifier that restricts the application of appropriate integrated resource management across BC.** This qualifier states that no management decisions may be made that “unduly restrict the supply of timber” even though the other resource values being managed may be, and often are, far more valuable than the timber.

Such qualifier inappropriately limits the Freedom of Resource Professionals to Manage BC’s Resources in an appropriate, ethical and sustainable manner. While there should be a hierarchy of values that guide resource management decisions in BC, such hierarchy should be developed in an open, inclusive manner with all

resource sectors appropriately represented in these decisions. See Issue # 11 below, Setting Goals and Objectives for BC's resources.

- 4. Change the focus of the Operational Plan Templates so they encourage the adoption of practices, results and strategies that achieve standards of resource management that are above the minimum required.** See Appendix # 21 below re an Incentive-based program which encourages such commitment.
- 5. Undertake a formal review of the TSR process.** The methodology used in completing this process varies throughout BC and is woefully outdated. Even though this process sets the stage for all timber harvesting and subsequent forest management across BC it has never undergone a formal review. Such is long overdue.
- 6. Change the term of the Cut-Control period for licensees from 5 years to 10 years.** This would recognize that most business cycles follow a 10 year term; it would give more management flexibility to all forest licensees, nearly eliminate the need for NRFLs and support better resource management.
- 7. Change the term of Cutting Permits from 4 years to 6 years:** This change would greatly simplify everything for everyone and result in much improved resource management. With a six year term fewer postponements will be required, licensees will have greater flexibility in delivering wood to their mills, and they will therefore have more operating options during periods of inclement weather or unfavorable ground conditions. (See more details under # 21 Incentives re both items 6 & 7).
- 8. Complete the Enactment of the Road Resource Act.** BC already has far too many roads the majority of which receive little to no maintenance. The complexity of existing legislation related to roads is confusing and a huge impediment to the appropriate and wise management of roads across BC. An appropriately implemented Road Resource Act could and would ensure that all roads in BC are well and properly located, maintained, deactivated or rehabilitated.
- 9. Complete the Enactment of the Water Stewardship Act.** Water is by far the most valuable natural resource in BC and it's priority should and must be formally recognized in legislation.
- 10. Develop Appropriate Environmental Legislation that applies to all industries and entities operating on Crown Land.** This is obviously logical, eminently fair to all parties and makes life much easier for any and all operators and Natural Resource Officers. All "players" or operators on the BC landscape should be

bound by the same environmental laws and regulations! None should be favored over the others.

- 11. Appoint a Committee to formally develop clear and measurable objectives for all of BC's natural resources.** This was the long-term intent of the previous NDP government. They planned to build on the completed Land Use and LRMPs however, the Liberals dropped this from their agenda. BC's natural resources cannot be managed in a responsible manner without having some clear objectives in place to guide such management.

Perhaps the long-standing but non-functional committee appointed by the Liberal Government—The Committee on the Environment and the Economy—could be directed to take on this task or a different committee be struck to do it.

- 12. Resurrect and implement the No Net Deforestation Policy for BC.** Such a policy is essential to BC and even Canada in reaching its Carbon reduction goals and also to enable and support the long-term sustainable management of BC's natural resources.

In 2014, Canada endorsed the United Nations New York Declaration on Forests to cut natural forest loss in half by 2020 and strive to end it by 2030.⁵

In September 2015, the United Nations member states, including Canada, adopted the 2030 Agenda for Sustainable Development.⁶

To meet the status of Sustainability BC and Canada must end natural forest loss so honoring these two commitments is complementary and essential.

As BC has the most biologically diverse forests in Canada, they should lead Canada in developing and adopting a proactive sustainable development policy that has, at its core, a Zero Net Deforestation Policy. In order to meet Canada's 2014 UN commitment in a timely manner, the work on developing and implementing this policy must start now.

- 13. Develop and Implement a Revitalized and More Comprehensive Protected Area Strategy for BC.** Such a program will support and complement the above and all of the other proposals included in this paper. Everything in nature is connected and what happens in one area affects all other areas and associated resources. Such a Strategy will facilitate reaching the 17.5% Protected Area promised by Justin Trudeau to help Canada meet the Carbon Reduction Targets as per the Paris Accord to which Canada is a signatory. This PA Strategy should

⁵ 2017 Annual Report--State of Canada's Forests Pg.9.

⁶ IBID Pg. 24

have as its guiding principle and goal to ensure that at least 40% of BC has some form of formal Protected-Area status. The proposed South Okanagan National Park should be a priority item for attention. A similar amount of Coastal waters should also be protected.

14. Institute a formal group to review and comment on the appropriate way to implement a revised Forest Tenure System for BC. All BC governments, especially the Liberals, loudly proclaimed the need for major forest tenure reform across BC. However, none ever made any meaningful attempt to do this. Rather the Liberals instituted several new types of forest tenures thus adding undue complexity to an already overly complex system. Getting forest tenure reform right is the best way to ensure the US countervail and anti-dumping duties are forever behind us.

15. Fully implement the Cumulative Effects Framework across BC within Two Years. There are two pilot projects being implemented on a trial basis, one in the Cranbrook area and one in the Prince George area. This program has excellent potential to be meaningful instrumental in ensuring all of BC's natural resources are managed in a beneficial, integrated manner that is truly sustainable.

The successful implementation of this program will negate the need for the FREP program which is hugely expensive with very few positive results to show for all its efforts.

16. Change the name and scope of the Forest Practices Board to the Natural Resources Board. The scope of the FPB is limited to anything related to, or covered by, FRPA. This should be changed so they can investigate any practice or contravention related to natural resources. **Also, more strength should be given to the Board's recommendations so they are acted on in a responsible manner instead of being ignored as they so often are at present.**

This proposal is supported by Bruce Fraser, a previous Board Chair, the BC Wildlife Federation and several others.

17. Consider forming a similar Board---The Agriculture Practices Board to monitor the management and disposition of agricultural land in BC. The long-term management of farm land in BC is severely jeopardized with ever increasing pressures on it. Proper preservation and management of this land is critical to the long term health and independence of the people of BC. One of the largest losses of forest land in BC is due to agricultural encroachments or alienations. This should be appropriately address and considered in the Provincial Zero Net Deforestation Policy.

18. Develop and Implement a Species at Risk Act for BC. Current legislation and associated regulations do not provide the level of protection required by nearly all species of wildlife in BC to ensure the populations of same endure forever. Hence the need for additional legislation.

19. Reinststitute the once credible Committee on the Environment and Economy for BC. This entity was disbanded then reinsttuted but never used as it too often embarrassed the political party in power. This group should be given strong support and wide latitude in the issues it evaluates and comments

20. Encourage the ABCFP, APEG, CoAB, BCIA and ASTTBC to form a formal coalition. The coalition could take the form of a Federation of Natural Resource Related Associations or something similar. There is strength in numbers. All of these Associations are dedicated to ensure the natural resources of BC are well and properly managed. Individually they have been far from successful in these endeavors, relevantly so with the failure to achieve the desired results via the principle of Professional Reliance.

These groups formed an initial and relatively effective alliance in responding to George Heyman and the Professional Reliance principle. This endeavor should be formalized so that all groups can and will work in a collaborative manner to ensure success with the performance of their professional duties especially relative to the principles of Professional Independence and Reliance.

They should also consider the development of an improved and more comprehensive Code of Ethics that applies to all members of all groups.

Consideration should also be made to include the ISA (International Society of Arborists) in this coalition as this is the largest organization in the world involved with the management of trees—trees mainly located in urban environments.

21: Develop an Incentive-Based system across BC's natural resource sectors that not only recognizes but also supports and appropriately rewards excellence in resource stewardship. While a C and E regime would still be essential, with an incentive-based system in place its role would be greatly reduced. It has long been known that the award/reward system is far more successful in achieving the desired results that is the coercion/punishment approach. This knowledge should be recognized and applied as per the following:

Incentives For Excellence in Forest Resource Management Across BC

By: Fred Marshall November 5, 2005; Updated, December, 2010, Nov, 2015 & Dec. 2017

Justification for Incentives:

The Forest Practices Code was a compendium of regulations, enforcement procedures, and penalties designed to prevent the occurrence of poor forest practices in B.C. Similarly, FRPA outlines Objectives, Default Standards, Practice Requirements and Results and Strategies etc. which are intended to direct and control a licensee's operations. **Both of these legislative initiatives describe a minimum performance level which, if not met, renders one subject to ever increasing penalties including fines, suspensions, jail sentences etc.** No fun for anyone!

Via FRPA and the Results-Based approach to resource management the government hoped for and expected improved results above and better than the bare minimum. However these hopes have not been realized; not surprisingly so because.....

There are absolutely no incentives provided or offered to the licensees under the current legislative regime to achieve a standard higher than the prescribed minimum, albeit generally acceptable, performance levels. As a result, virtually all licensees develop Plans (FSPs, WLL Plans or Range Use Plans) that meet the lowest acceptable standards. The templates provided by the government inherently lead and encourage the licensees to do this.

To achieve better than the minimum level of results a more proactive approach is needed. This approach should not only support the attainment of excellent results but also proactively encourage and recognize it via an appropriate mix of both awards and rewards.

Control of human behaviour can most favourably be affected by a judicious mix of incentives and penalties. While both are required, the mix that favours incentives and utilizes the punitive measures only when necessary, has the best chance of being successful and ultimately of being accepted by the people of B.C. The incentive approach always achieves better results. Results that so far have been extremely elusive and hence almost entirely absent via the approaches of FRPA and Professional Reliance.

The incentives therefore are an essential part of the formula and policy approach required to achieve excellence in long term sustainable resource management in B.C.

The "package" of incentives proposed to facilitate adoption of this proposal is outlined below.

Step 1: To start the program the Government would establish a Working Group (WG) that would develop the detailed criteria for the various Classes and work to implement the program. The WG should be made up of representative from the MFLNRO, forest licensees, NGOs and others. It should consist of 8-12 members each with a 2-3 year term which could be extended at the discretion of the government.

The WG, would write up a RFP outlining the criteria for each classification. All Licensees would, on their own initiative, respond to the RFP applying for whatever class they felt they should be in. No

response would result in an operator being classified as a Class C Operator. As such, the system would be entirely voluntary!

Step 2: Define The Criteria of and for Various levels of operators.

Classify all forestry operators in B.C. as per the following

Class A: Excellent ----- operator consistently exceeds the norm.

Class B: Very Good ----- operator generally exceeds the norm.

Class C: Good ----- operator at or occasionally above the norm

Class D: Poor to Very poor----- operator at or often below the norm.

Class Ranking Criteria: Some thoughts on this are provided below. The WG would add to this as deemed desirable and appropriate.

- **Forests Certification and Environmental Product Certification**
For any operator to achieve a Class A status their forest operations would have to be certified under FSC, Class B under CSA and Class C under SFI, Class D operators would have no Certification.
- **A Clean Operating History:**
 - Class A: No or only very minor operating infractions over the past 5 years.
 - Class B: Ditto over the past 3 years.
 - Class C: Ditto over the past 2 years.
 - Class D: Any incidents within the past 2 years.
- **An exemplary safety record.** As above with Criteria to be developed by the WG.
- **A good record of Community Responsibility** (Criteria to be developed by the WG).
- **Have all stumpage and other payments fully current** etc.
- **Others** to be developed and added by the WG.

The Incentives: (The Rewards)

- **Environmental Wood Credits:** Upon any new AAC becoming available the allocation of same would be as follows:
 - Class A operators would be allocated 80% of the AAC available with such distribution being based on their relative ranking and existing AACs.
 - Class B operators would receive the remaining 20%.
 - Class C and D operators would receive none.
 - If there were reductions in the AAC they would be applied in a similar but reverse order manner; i.e. the higher reductions would apply to Class C and D operators.
- **Administrative Efficiencies**
 - For all Class A operators the turn-around time for Site Plans, Road Permits and Cutting permits, would be 30 days.
 - For all Class B operators the turn-around time would be 60 days
 - For Class C operators 90 days.
 - For Class D operators 120 days.
 - Class A operator would have Cutting Permit terms of 6 years, Class A-5 yrs. Class C & D operators 3 years. (See Sections 7 above for details).

- Cut-Control periods would be 10 years for Class A Operators; 8 years for Class B; 6 for Class C and 5 for Class D. (See Section 6 above for more details.)
- **Auditing:** All licensees would be required for performance audits with the costs involved being paid by them. All audits would be in addition, but complementary to, those done by the relevant Certification Organizations. Their auditor would have to be a respected, independent auditor approved by the WG.
 - For Class A operators auditing would be every 3 years.
 - For Class B operators semi-annually
 - For Class C operators annually
 - For Class D operators biannually.
- **Freedom to Manage:** Various opportunities to be determined by the WG. **A methodology that would achieve results well above the required minimums.**
- **Others** to be developed by the WG
- **More Incentives: (The Awards)**
 - **Environmental Performance Awards:** Every two years the WG, with the MFLNRO and the MOE, would recognise excellent performance by giving Environmental Performance Awards to the Class A operators. These awards would be well publicized with the press and media present at an annual awards banquet where the Premier and Ministers would personally present the CEOs and Forestry Staff of each Class A company an appropriate Certificate of Excellence. Undoubtedly this would make not only the Premier and his Ministers very proud, but also the Forest Companies receiving the awards.

Imagine how the Chief Foresters and their staff and the owners of their companies would feel if they were so honoured! Ditto for the Premier, the respective Ministers and the members of the Working Group. Walking across that stage, in front of millions of people, would convey a feeling that no one would ever want to miss.

Step 3: Implement the program and revise as appropriate with experience.

Summary: Once the above system were in place and the various operators knew that their good performance would not only be recognised (awarded) but also rewarded, and once having achieved Class A status, they would ensure that such status was never lost! For those who did not have Class A status, they would most certainly endeavour to achieve it.

The costs incurred by the government in implementing such a system would be minimal, perhaps 80% to 90% cheaper than the current approach, with savings of several million dollars annually.

Acceptance by industry and the general public would be extremely positive and, most importantly, would provide a supportive change to the all too negative attitude towards forestry in B.C. today. BC would have a world-class reputation for excellence in forest resource management. This system would be a huge win for everyone involved.