

## **JUSTIFICATION OF BC SUSTAINABLE FOREST MANAGEMENT CLAIMS**

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### **SUSTAINABLE FOREST MANAGEMENT (SFM)**

BC has adopted the definition of SFM as: “The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biological diversity, productivity, regeneration capacity, vitality, and their potential to fulfill, now and in the future, relevant ecological economic and social functions, at local, national, and global levels, and that does not cause damage on other ecosystems.” Food and Agriculture Organization of the United Nations (Ref: Canadian Institute of Forestry’s *The Forestry Chronicle* Vol 70 (6): 666-674).

### **BASIS OF ASSESSMENT**

The BC Government and the forest industry continue to claim provincial forest stewardship practices result in sustainably managed forests (Sustainable Forest Management, SFM). This paper discusses the rationale, for a layperson audience, used to make this claim and how its understanding could be a contribution to granting social license.

An assessment of the status of achieving SFM involves the application of legal requirements (legislation, regulations, policies) as a basis. Government and industry also use third party forest certification audits, Forest Practices Board (FPB) audits and several monitoring, compliance, and data collection programs to support the claim of SFM practices in BC.

#### **Legal requirements**

The primary legal instruments that guide forest stewardship are the Forest Act (FA), the Forest and Range Practices Act (FRPA), the Wildfire Act, and the Wildlife Act and all the associated regulations and policies.

#### **Third Party Certification audits**

In Canada, there are three (3) third-party, independent and voluntary certification systems for SFM used: [Canadian Standards Association’s Sustainable Forest Management Standard \(CSA\)](#), [Forest Stewardship Council \(FSC\)](#) and [Sustainable Forestry Initiative \(SFI\)](#). These are all voluntary systems and adopted at the discretion of the forest company. They all contain a list of performance standards that meet generally accepted SFM practices to assess the status of forest stewardship. The standards reflect the principles, criteria and objectives related to the current understanding of SFM in the areas of

reforestation, harvesting quotas and balancing the consideration of the environmental, economic, and social/cultural values in a forest area. The certification auditing is carried out by an Accredited Independent Certifier that assesses forestry operations against the Forest Certification System standards. The audit is applied to the management of a specific forest management unit (e.g., Tree Farm License, Forest License, etc.) on a periodic (e.g., every 5 years) basis.

Although the certification system's standards are not driven by Government legislation, regulations, and policies, these instruments provide the certifier with a basis of evaluating SFM. The forest certification audits complement the auditing and monitoring systems of provincial forest management laws, regulations, and monitoring systems.

In addition to using the audits to evaluate SFM practices, companies, and Government use forest certification as a tool to support:

- 1) Consumer product labeling assessment in purchasing decisions.
- 2) Forest company demonstration of commitment to SFM.
- 3) Community support (social license) for forest management practices.

In 2022, B.C. has 50 million hectares certified to at least one of these internationally recognized certification programs: 49.4 million hectares (97%) to SFI and 1.4 million hectares (3%) to FSC (<https://www.canadianwood.in/why-wood/sustainable-forestry-certifications/>). This is 92% of the total forest area (excluding naturally sparse forested areas).

### **Forest Practices Board (FPB)**

The FPB is a government created independent organization that audits and investigates the forest practices of industry and Government relative to whether they are meeting the intent of the FRPA and the Wildfire Act.

While the FPB does not lay penalties, its recommendations to Government have led directly to improved forest practices such as stronger government decision-making processes and better communication among forestry professionals to manage risks to the environment (<https://www.bcfpb.ca/board/what-we-do/>). Government considers the FPB the public's watchdog for sound forest and range practices in BC.

Fulfilling the FPB mandate is done through auditing timber harvesting, road and bridge construction, maintenance and deactivation activities, silviculture activities and obligations, and wildfire protection practices. The FPB auditor provides an opinion on the seriousness of any shortcomings and recommended actions in a report. The FPB also conducts compliant investigations, appeals and special projects as part of their mandate.

The number, type, and scope of audits each year are established by the FPB Director of Audits in accordance with the Board's strategic priorities and budget. To ensure audits provide a balanced picture

of practices across BC, the FPB randomly selects areas throughout the province, normally at a Forest District level. The audit staff then review the forest and range resources, geographic features, operating conditions, risks to resources and other factors in each area selected. These factors are considered in conjunction with the strategic priorities of the Board, which are updated annually, and the type of audit (i.e., full-scope compliance, limited-scope compliance, or enforcement) determined. Auditees are then selected based on consideration of the identified risks and priorities.

In the case of BC Timber Sales (BCTS) audits, a Forest District within one of the 12 business areas of the province is selected randomly for audit. Licensee management units are selected using the same criteria for auditing no more than once every 5 years.

FPB reports are sent to Government, the auditee, other appropriate complainants, or organizations and summarized in the FPB Annual Report that is made public.

### **Monitoring, Compliance, and Data Collection**

In addition to the evaluation of forest practices performance relative to application of forest legislation, regulations, and policies, Government has other programs that are intended to evaluate or improve the state of forest stewardship. These include:

- The Forest and Range Evaluation Program (FREP) which has an overarching mandate to promote and improve sustainable management of BC's forest and range resources by monitoring and evaluating the condition of the 11 FRPA resource values in areas across BC and provide recommendations based on the results.
- Compliance and enforcement (C&E) programs determine whether a Licensee has complied with the forest practices regulations. Reports are provided to the forest manager and Government.
- Many studies that evaluate whether expectations from forest management practices will/are resulting in the expected objectives, for example:
  - Change Monitoring Inventory (CMI) and Young Stand Monitoring (YSM) ground sampling programs to determine how young stands are growing compared to projections.
  - Growth and yield permanent sample plots program to monitor tree growth over the long term to refine stand yield models which influence determination of timber supply availability (AAC).
  - Forest genetics trials to determine whether the expected growth and wood properties are consistent with what is expected from genetically improved seed.
  - Research trials on various aspects of silviculture and forest resources management practices.

### **IS THE ASSESSMENT BASIS GOOD ENOUGH?**

The BC rationale for the status of SFM involves an assessment of the combined results of how Government and the forest industry are delivering on the legal requirements, meeting third party forest

certification audit requirements, FPB strategic priority areas, and results of several monitoring, compliance, and data collection programs.

Some forest advocates continually question both the sufficiency of the basis of the assessments, and whether the results adequately determine whether BC is practicing SFM. It is important that these views be taken seriously but with the understanding forest management practices continually change over time due to new data, research, and public values. Also, whether advocate agendas are going beyond the practice of SFM in the questioning of the assessment. There are three (3) major questions in evaluating these criticisms:

- 1) Do the assessment tools and the application of the results provide the necessary guidance for long-term forest stewardship that leads to community resiliency?
- 2) Has Government and the forest industry adopted the most up to date information and knowledge relative to the practice of SFM that fulfills the overall goal of balancing now and in the future, the relevant ecological economic and social functions at local and provincial levels?
- 3) Is the level of assessment sufficient to meet the definition of SFM?

Key associated issues relative to these questions are discussed in

<https://www.bcforestconversation.com/building-confidence-forest-management-integrated-approach/>

if more information is desired.