

ABCFP Presentation to the Area-Based Tenure Consultation
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Thank you for this opportunity to provide comments to the Area-Based Consultation Process and for the government's commitment to engage in broad consultation prior to tenure policy changes.

We will begin by framing the context of the submission by the Association of BC Forest Professionals (ABCFP), summarize previous responses by the ABCFP and finally we will provide you with our perspective on the important *Benefits and Process* questions identified by the consultation process.

1. Context of the ABCFP Submission

BC is covered by forests. The public owners of the natural resources reap many benefits and in many ways, the forested landscape defines who we are in BC – Supernatural BC. We have told ourselves, and the world, we use our resources wisely and we manage the forest land sustainably. It is not surprising that 67 years ago, the BC government created professional forestry legislation to ensure forests, forest lands and forest resources are managed by professionals grounded in applied science knowledge and focused on the everyday tasks and problems in the natural environment. Sustainable forest management is the role and the service of the BC forest professional.

The ABCFP was established to regulate forest professionals and the practice of professional forestry. To that end, the ABCFP sets standards of practice and conduct for forest professionals. We also provide guidelines for professionals so that they may meet those professional standards.

The ABCFP is also required by law to advocate and uphold principles of stewardship. This advocacy requirement is unique to professions generally, and while narrow in application, the advocacy requirement is an important imperative for stewardship of BC resources. The ABCFP takes this special role seriously and it is the foundation of the responses from forest professionals over the preceding three years with respect to the timber supply solutions. We have attached the *Principles of Forest Stewardship (May 2012)* created by volunteer members of the stewardship committee as a benchmark to the government deliberations regarding tenure changes. Staff and volunteers at the ABCFP work hard to provide professional guidance to forest practitioners and advocate for a principled approach to stewardship of forests, forest land, forest resources and forest ecosystems.

Over the last decade, the forest health catastrophe caused by the epidemic of mountain pine beetle (MPB) in our forests is a stark reminder about the serious and complicated conditions that are present when managing natural ecosystems. Applying ecological

science amid social goals, changing expectations and economic parameters is what forest professionals understand and do on a regular and consistent basis.

2. Previous responses from forest professionals

At the outset of the conversation regarding timber supply, the ABCFP drafted a report on the mid-term timber supply for the Chief Forester of BC. The report process included broad member consultation, expert opinions, and local conversations with professionals. We heard three dominant themes from forest professionals: the importance of public consultation; consequences of short-term management objectives; and importance of thinking long term when contemplating the forest resources of BC. The report included seventeen recommendations of managing the mid-timber supply in MPB-impacted landscapes.

During the Special Committee on Timber Supply hearings in the summer of 2012, the ABCFP provided input in a number of ways. We provided the key messages to forest professionals throughout the province who then addressed the Special Committee; we attended all hearings, and we made a presentation to the Special Committee at the Vancouver hearing. When we were asked by the Special Committee if we supported a tenure conversion from volume-based tenure to area-based tenures, we responded that it didn't matter what form of tenure contract was used so long as the necessary components are in place to ensure that the forests are sustainable and that they result in the benefits expected by the public.

One of the recommendations of the Special Committee includes the prospects for increasing the number and diversity of area-based tenures in the province. The ABCFP in previous responses has started conversations on forest management change with "think of the forests first." The premise is that the forested ecosystem is the foundational component that drives most other values we receive from our forest environment. In keeping with this overarching theme, we point out that tenure on its own is not the solution to mid-term timber supply shortfalls, a changing climate, or product markets. It is a single tool among many in forest management.

3. The Benefits and Process of Tenure Conversion

We believe that government is focusing on the right issues, asking potential area-based tenure holders how social, environmental, and economic objectives would be advanced. It's important in all of these areas that they support goals that the government is trying to achieve with its sustainable forestry policies.

The Area-Based Forest Tenure Consultation process requested specific advice on,

- *the social, economic and environmental benefits that should be sought from proponents interested in converting their forest licences, and*

- *the criteria for evaluating applications and the process for implementing conversions, including specific application requirements and target locations for conversion opportunities.*

Terms of Reference for Area-Based Tenure Consultation Process

Benefits to the public owner

Government wanted to understand the benefits of tenure change so that any implementation would be effective and respectful. So we asked forest professionals:

- a) *“What are the benefits that should accrue to the public owner if a forest licence, or part thereof, were to be converted to an area-based ‘kind’ of tenure?”*

The government’s proposal lists the province’s social economic and environmental objectives and states that the application “must show how some or all” of these objectives would be advanced.

Overall, the government’s proposal list looks reasonable. In addition, the ABCFP proposes the following benefits that should accrue to the public forest owner.

- Investment in the forest. For example:
 - Inventory, growth and yield Investment: better information identifies the expected future yield and products.
 - Managed stand investment: higher timber yields from increased silviculture investments. This will translate into more jobs, more Crown and corporate revenue, and more stability overall.
- Innovation in the activities on the land and in professional service (primarily tailored to solving mid-term timber supply and forest health issues in MPB affected forests).
- Resource planning (long-term integrated resource planning for the application area).
- Public consultation for planned forest activities. Direct tenure holder involvement in public dialogue (e.g. public working groups).
- Climate adaptation measures (e.g. ability to respond to a changing climate by testing and evaluating alternative species or mixtures of species and densities).
- Forest resources monitoring program (e.g. active participation and contribution to an existing monitoring program, FREP, in the application area.).
- Consistent and predictable employment for local economies.

- Coordinated harvest schedules: for example, a) immediate harvest response of stands subject to serious damage, b) harvesting the profile of the forest inventory.
- Greater sensitivity to local communities – providing training and opportunity for First Nations members, community stability by creating more employment on forestry projects, investment in community infrastructure, and allowing access to the forest by the public.
- Demonstrate that the applicant(s) are existing ‘good corporate citizens’ e.g. past performance in adhering to Chief Forester’s AACs and timber and non-timber objectives spelled out in FRPA.

Criteria for Evaluation and Process

In asking about the criteria that should be used for evaluation of applications and the process for implementing the timber tenure conversions, the government expects that the advice they receive would be used to formulate regulation and policy. So we asked forest professionals:

“If an area-based tenure were to be offered by the government, then what criteria should be used for evaluating such applications and the process for implementing a conversion?”

The ABCFP mandate includes promoting good forest stewardship and therefore the following comments address those criteria that would support a wise stewardship approach in the application process.

a) Criteria for Evaluating Applications

The government’s proposed application process looks reasonable. In addition, the ABCFP proposes the following criteria for evaluation be considered.

- Performance. Evidence of good performance on existing tenures, especially area-based tenures. This should be demonstrated with measurable attributes which show evidence of a strong commitment towards silviculture, stand tending, and inventory (if applicable).
- Planning. A comprehensive management plan that includes:
 - the temporal and spatial perspectives to manage forested land;
 - a multi-value perspective that incorporates all of the values for the land area such as maintaining biodiversity; fish and wildlife habitat; reforestation and soil conservation; improving productivity through

intensive silviculture; long-term employment; access, recreation and local community stability;

- Requirement for a full-rotation crop plan
 - Forward looking to include projected effects and responses to changing markets and diversification of forest products and services.
- Current science. Demonstrate that planning integrates developing knowledge into operational planning. For example, improved inventory data, accessing current technologies (LiDAR), accessing current adaptation science (Larch seed transfer).
 - Principled Approach. Demonstrate a principled approach to managing forest resources and solving the complex problems.

b) Process for implementing a conversion

- Ensure the tenure application promises made by the prospective applicant are clear and included in the long-term content of the licence document.
- Approved plan that outlines the commitment approach and includes systems for monitoring and adapting to changing conditions.

Summary

Almost every natural resource in BC is either influenced by forest cover or covered by forests. In either case, a stewardship approach to management is essential. As a responsible society, we must ensure we are managing our forests to meet the needs of the present without compromising the ability of future generations to meet their own needs. By focusing on just one or two aspects of management, we can lose sight of the forest, the very living thing that provides a majority of our benefits in BC. The forests in BC are a renewable resource if managed properly.

Forests are sustainable when they have the capability to endure and maintain healthy communities, resilient ecosystems and when they maintain the values of our society. Forests are so fundamental to sustainability that the options for tenure need to include the forests first.

In summary, 100 years ago, out of a concern for a dwindling forest resource, the BC government of the day continued to retain public ownership of forests, established the first *Forest Act* and an agency to guide the management forests. Today, we ask you to look 100 years to the future when future generations and industries will be the recipients of our forest management actions today and ask yourself “How will our forest management actions of today be judged?”

An informed and principled approach to management will continue to ensure that BC forests consistently deliver all of the values important to British Columbians. It is

important that the management of forests focus on these values. Forestry is conducted on very long – 100 year – time frames. While it is easy to be caught in the moment, it is dangerous to be in the moment when not fundamentally prepared for achieving success of forest resources management in the long term.

We look forward to discussing with you our basic information and a further conversation regarding professional service in area-based tenure and the current mechanisms in tenure that might be barriers to achieving benefits of tenure change.

Principles of Forest Stewardship¹

May 2012

REPORT

¹ As per the *Foresters Act* S.4(2)(b) “to advocate for and uphold principles of stewardship of forests, forest lands, forest resources and forest ecosystems”

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Background and Purpose

Forest Stewardship is the responsible use of forest resources based on the application of an ecological understanding at the stand, forest and landscape levels which maintains and protects ecosystem function, integrity and resilience. It is based upon an ethical responsibility to the land and people for current and future generations.

The definition of forest stewardship is the foundation for the following seven stewardship principles. The integration of these into daily practice will assist forest professionals in maintaining the integrity and resilience of forest ecosystems. The principles are interactive in the decision making process and apply equally to site-level plans or to planning on a much larger scale. As a 'living document', these principles may evolve over time, as our use and understanding of them expands.

The *Foresters Act* establishes the profession by defining the practice of professional forestry, the classes of membership and the Association of BC Forest Professionals (ABC FP). It identifies that the ABCFP is composed of all of the members of the association and the members of council.

The word "stewardship" occurs three times in the *Foresters Act* and "principles of forest stewardship" are two of those instances:

1. Section 1 defines "conduct unbecoming a member" to include member conduct that "undermines the principles of stewardship that are the foundation of the practice of professional forestry."
2. Section 4(2)(b) specifically directs the ABCFP "to advocate for and uphold principles of stewardship of forests, forest lands, forest resources and forest ecosystems."
3. Section 11 (1) allows that Council may pass resolutions, including for "(1) the promotion of good forest stewardship."

The seven principles of forest stewardship extend from the *Foresters Act* and are consistent with the Code of Ethics (Bylaw 11) and the standards of Professional Practice (Bylaw 12). In addition to guiding the responsible use of forest resources, they are intended to serve the following purposes:

- Provide further definition to the requirements of the *Foresters Act*;
- Establish a platform for forest stewardship advocacy by the ABCFP and its members; and
- Guide forest professionals in their daily practice of resource decision-making;

- upholding the principles of stewardship of forests, forest lands, forest resources and forest ecosystems.
- Provide additional measures of professional guidance for members, relative to upholding the principles of stewardship of forests, forest lands, forest resources and forest ecosystems;

The Principles

1. Ecological Integrity

Stewardship requires the maintenance of structure, composition and function of forest ecosystems within ranges that ensure the long-term diversity and resilience of the ecosystem.

Ecological integrity refers to the wholeness of ecosystems, as well as the capacity to retain that wholeness over time, in response to change or disturbance. Maintaining ecological integrity requires recognition of valued ecosystem components² at the site level, the landscape level and on a global scale.

2. Information and Understanding

Stewardship requires knowledge of the values present in the forest, as well as science-based understanding of how forest ecosystems function and change over time.

A wide range of information sources are needed by forest professionals for forest stewardship, such as inventories, maps, ecosystem classification, plans and public input. Information sources must be reliable and reasonably up to date. Scientific knowledge as well as traditional ecological knowledge and experience gained through operational practices provide a foundation for our understanding of ecological systems. Forest stewardship often involves a multi-disciplinary team using the best available science and expertise for management and decision-making, to provide accountability for on the ground results.

3. Forest Management Goals and Objectives

Stewardship requires clear goals and objectives to guide management activities on forest land.

Forest stewardship goals and objectives are determined by society and the landowner. They can take the form of legislation, policy or other non-statutory agreements, standards and practices. These goals and objectives reflect a broad spectrum of social perspectives, based on a sufficient level of public engagement, locally and provincially. Forest professionals work with other resource specialists within the framework of these goals and objectives and are relied upon to integrate the range of values present and to plan for the desired outcomes of forest management activities.

² Valued Ecosystem Component (VEC) is defined in the glossary. Site level VECs include species at risk and soil conservation; landscape level VECs include biodiversity and hydrology; global VECs include the carbon cycle and climatic effects.

4. Social Foundation

Stewardship requires management strategies that create benefits consistent with the values and interests of society.

Human well-being is a catalyst for the application of stewardship; therefore, forest management requires an understanding of the full range of forest attributes that provide value to people, including economic, aesthetic, cultural, spiritual or other values that are more challenging to quantify. Responsible forest resource management will integrate and balance the needs of communities over time.

5. Temporal Options

Stewardship ensures that current management strategies are intended to create benefits for both the present and future generations.

Stewardship of forest resources requires that practitioners deliver benefits for today's society without risking options for future generations to enjoy similar benefits over time.

6. Spatial Strategies

Stewardship ensures that an appropriate range of spatial scales are used to monitor, assess and plan forest management activities.

Maintaining a full range of forest ecosystem values requires consideration of the larger scale of a watershed, landscape unit or even broader, up to the global ecosystem. This in turn, guides decisions at the stand level and the activities on the ground. It is important for forest managers to monitor and mitigate cumulative impacts while recognizing that benefits may also become apparent while planning at larger scales.

7. Adaptive Practice

Stewardship requires strategies to minimize and mitigate risk and uncertainty in forest management.

Change is part of both the forest ecosystem and the socio-economic systems that define resource values and management objectives. An adaptive approach to forest management encourages forest professionals to be innovative, using tried and tested practices or new ideas combined with creative problem solving skills. This approach requires periodic re-assessment of basic assumptions and a planning regime that adjusts management strategies over time in response to critical thought and ongoing, monitoring and research. The adaptive approach produces decisions that anticipate likely or possible future events, with flexibility to be able to mitigate unforeseen natural events as they arise.

Guidance on Professional Practice and Conduct Necessary to Uphold the Stewardship Principles

The Principles of Forest Stewardship are intended to be broadly interpreted. Because specific practice activities in the forest are the management prerogative of the landowner or government, forest professionals may be judged on the content and delivery of their professional work however the outcomes can be beyond their control. The following questions provide forest professionals with a method to demonstrate how their practices are consistent with the principles.

“I am confident that my professional work upholds the principles of forest stewardship when it meets the following tests.”

1. Legal Test

Does my professional work comply with the applicable laws? (As per Section 1 of the *Foresters Act*)

The legal test can include questions such as the following:

- Do I know which laws apply to the practice of professional forestry?
- Can I demonstrate that I am working within my area of expertise or have sufficient mentorship?
- Does my work meet the legal requirements? (Including standards, ethics and peer review?)
- Have I recognized that applying principles of forest stewardship is a form of due diligence?

2. Knowledge and Application Test

Does my professional work consider the requisite knowledge and information to ensure good forest stewardship?

The knowledge and application test can include questions such as the following:

- Can I demonstrate that my professional work is informed by the current and available information?
- Can I demonstrate the right level of investigation and risk assessment using appropriate scales and timelines?
- Have I taken actions to ensure the quality of my professional work using peer reviews or comparison to similar work completed?

- Can I demonstrate that my professional work applies the principles of stewardship?

3. Communication Test

Does my professional work properly communicate the necessary information to show that it is consistent with the principles of stewardship?

The communication test can include questions such as the following:

- Is my professional work supported by sufficient rationale so that, where required, others can implement recommendations or prescriptions for action and meet the objectives and commitments embodied in my work?
- Have I considered with whom it is important to communicate?
- Have I explained what I did to lead to a clear understanding?
- Is my professional signature and seal on professional documents? Where no professional documents exist, is there a professional record of work sufficiently clear to provide professional assurance?
- Is there sufficient documentation and verbal direction for the implementation and results of my professional work?

4. Outcomes & Balance Test

Do I use a reasonable and balanced approach in my professional work to ensure good forest stewardship?

The outcomes and balance test can include questions such as the following:

- Does my professional work incorporate a clear analysis of the range of practical options?
- Have I addressed, to an appropriate level, the assumptions, contrasts, and context of my professional work?
- Does my professional work incorporate my recommendations?
- Have I addressed appropriate reporting on progress towards achieving the landowners' goals for resource management?

Glossary of Terms

Advocate: (Advocacy) is a political process by an individual or a large group which normally aims to influence public policy and resource allocation decisions within political, economic, and social systems and institutions. It may be motivated from moral, ethical or faith principles or simply to protect an asset of interest. Advocacy can include many activities that a person or organization undertakes including media campaigns, public speaking, commissioning and publishing research or polls.

Biological diversity (biodiversity): The variability among living organisms from all sources, including, without limiting the generality of the foregoing, terrestrial and marine and other aquatic ecosystems, and the ecological complexes of which they form a part and includes the diversity within and between species and of ecosystems.³

Ecosystem: A dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.⁴

Forest Management: The planning and implementation of sustainable production of forest crops and other forest resources and uses. Key decisions include land allocation to different uses or combination of uses, silvicultural method and practices, intensity of management, timber harvest scheduling, and environmental protection. Modern forest management usually involves the production of multiple services of value to the owner or to society. Determining the best mix of services requires technical information on trade-offs between the different outputs, costs and values, and pertinent legal constraints.⁵

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.

Principles: Important underlying laws, similar to standards, rules, beliefs, or tenets – also called ‘enduring truths.’

3 As defined in the *Canadian Environmental Protection Act, 1999*

4 As defined in the *Canadian Environmental Protection Act, 1999*

5 McGraw-Hill Concise Encyclopedia of Environmental Science.

Resilience: The persistence of natural systems in the face of changes in ecosystem variables due to natural or anthropogenic causes; the capacity of a system to absorb disturbance and reorganize while undergoing change so as to still retain essentially the same function, structure, identity, and feedback.⁶

Stewardship: Stewardship specific to the forest profession is used in the *Foresters Act* as indicated above, and is described in ABCFP Bylaws 11 and 12.

Uphold: To maintain, defend or act on something.

Undermine: To subvert, weaken or ruin by degrees.

Valued Ecosystem Component (VEC): Is an environmental element of an ecosystem that is identified as having scientific, social, cultural, economic, historical, archaeological or aesthetic importance. The value of an ecosystem component may be determined on the basis of cultural ideals or scientific concern. Valued ecosystem components that have the potential to interact with project components should be included in the assessment of environmental effects.⁷

⁶ Walker, B., Holling, C. S., Carpenter, S. R., Kinzig, A. (2004). "Resilience, adaptability and transformability in social-ecological systems"

⁷ As defined by the Canadian Environmental Assessment Agency.



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Ensuring BC's Forests Are In Good Hands.