



File: 0280-40/BCTS Review

April 1, 2025

Honourable Ravi Parmar
Minister of Forests
Parliament Buildings
Victoria, BC V8V 1X4
VIA EMAIL: FOR.Minister@gov.bc.ca

Dear Minister Parmar

Re: *Submission to the BCTS review*

We are pleased to submit this letter in support of the ongoing BC Timber Sales (BCTS) review.

As the province's independent watchdog for sound forest and range practices, the Forest Practices Board (the Board) has observed and reported on BCTS forest practices for the past two decades through our audit and complaint investigation programs. During this time, the Board has identified both sound and unsound forest practices in BCTS operations. Where we identify practices that need improvement, BCTS has responded effectively, resulting in better forest practices. These improvements benefit BCTS and can also positively impact the entire sector.

BCTS manages the sale of approximately twenty percent of British Columbia's allowable annual cut, which represents a significant strategic influence on the sustainable management of BC forests. This is important as BCTS, like forest sector licensees, can provide an innovative leadership role for the benefit of all British Columbians. We support the review of BCTS and, in particular, how it can contribute to innovative stewardship practices in our forests.

BCTS was founded on providing a market pricing mechanism, which it has done. The existing pricing system is based on standard practices and does not adequately account for the incremental costs associated with introducing innovative or adaptive management-based practices. The Board recommends that BCTS gather pricing data for use in the General

Appraisal system or build a model that recognizes costs associated with alternative harvesting approaches and innovative practices.

Implementing improvements to harvesting systems and innovative practices requires BCTS to change its oversight at the site level. Under the current BCTS business model, harvesting rights are awarded to the lowest bidder leaving limited ability to improve practice requirements and compel compliance. As one area of note, the Board has observed that engineered crossings are particularly at risk of non-compliance for BCTS Timber Sale Licence (TSL) holders. There is an opportunity for BCTS to develop new approaches to ensure current and incremental practices are carried out adequately. The Board recommends that BCTS consider building on the Forest Professional Oversight and Certification concept to improve how TSL holders achieve their legal and stewardship obligations, and where necessary, compel compliance through new tools and approaches.

As part of the BCTS review, a commitment to double the volume allocated to Category 4 registrants was announced, aiming to expand the value-added program in BC. Although there are many benefits to increasing the number of small-volume licensees, the Board has observed that licensees managing small-volume licenses are at a higher risk of having more instances of non-compliance compared to others. These licensees, which are often working in areas where government and larger tenures have difficulty or could not operate, have shared with the Board that their operating areas and business scale have increased complexity of issues and capacity challenges. BCTS might consider separating activities such as planning and harvesting (contracts) and processing (sales) into different business streams, allowing registrants to remain focused in their specialized service areas, reducing or mitigating the above-mentioned trend in capacity challenges.

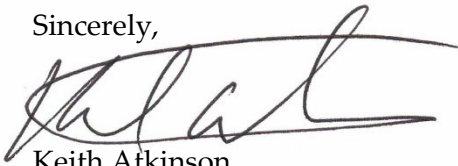
The new and emerging Forest Landscape Planning (FLP) regime is an important reflection of innovation in the stewardship of forests. Importantly, this new regime aims to establish clear outcomes for the management of forest resource values within defined areas and is anchored in participation with indigenous peoples in BC. The Board is an advocate for this level of collaborative planning that amongst other things, allows for consideration of practices that reduce wildfire risk, manages biodiversity and employs a variety of silviculture systems. BCTS, although not a licensee, is similar to major licensees in that they hold important local knowledge and capacity toward forest resource planning.

Becoming the leader in innovative sustainable forest stewardship will require both a strong support mechanism for implementing innovative ideas and a process for monitoring and refinement to ensure the changes provide the benefits as envisioned.

Removing barriers to innovation can improve sustainable forest and range stewardship and we at the Board will continue to uphold our mandate of monitoring sound forest and range practices, ensuring compliance with FRPA and the Wildfire Act, and encouraging sustainable forest and range stewardship in BC.

We look forward to the results of this BCTS review and hope you find this input valuable. If you are interested, we would be pleased to meet with you to discuss it further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Atkinson', written over a light blue horizontal line.

Keith Atkinson

Board Chair

cc: BCTS.Review@gov.bc.ca