



December 16, 2025

File: 0280-30/PFAC

VIA EMAIL

Garry Merkel, co-chair
Shannon Janzen, co-chair
Provincial Forest Advisory Council
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Dear Mr. Merkel and Ms. Janzen,

We appreciate the opportunity to provide input into the Provincial Forest Advisory Council's (PFAC) examination of barriers to effective land-based decision-making in British Columbia. The Board's investigations, audits, and special reports consistently point to systemic issues: unclear objectives, misaligned incentives, fragmented oversight, and the absence of landscape-level systems. These barriers undermine coherent forest management despite strong operational compliance by licensees.

British Columbia's forest sector is undergoing significant transformation. Forest Landscape Planning, the Old Growth Strategic Review, the Watershed Security Strategy, the Biodiversity and Ecosystem Health Framework, and other major initiatives are reshaping expectations for how forests are managed. These initiatives signal important shifts but create uncertainty.

What the sector needs most is certainty: a clear, stable direction for how land-based decisions are made and how multiple provincial goals will be reconciled on the ground.

The Systemic Problem

Through its investigations, audits, and special reports, the Board finds that most licensees comply with existing requirements. Yet persistent issues, such as old growth management or rates of cut in watersheds, continue to surface as part of ongoing management of public forest lands. This combination—high compliance paired with recurring problems—points to systemic issues rooted in policies that no longer serve the public interest. Modernizing the following systems is needed to align public interest with current forest management and practices.

Area-Based vs. Volume-Based Tenures

Area-based tenures promote accountability and provide incentives to improve stewardship outcomes and investments. These tenures can transform how forest resources are managed and allocated, encouraging shared decision-making and Indigenous land stewardship.

Volume-based tenures diffuse responsibility because stewardship is not tied to a defined land base. As a result, two licensees can operate within the same landscape yet produce notably different outcomes on the ground. These discrepancies expose weaknesses inherent in organizing systems around timber volume rights rather than place. Area-based approaches that support shared stewardship and reflect local values—particularly when aligned with the interests of Indigenous land stewards—are expected to be more consistent and have proactive outcomes because responsibilities, accountabilities, and benefits are tied to a distinct land base and one tenure holder.

Misaligned Economic Incentives

The current appraisal system fails to incentivize better stewardship. When enhanced stewardship efforts are not reflected in stumpage rates, licensees who invest in better outcomes receive no recognition for doing so. This acts as a disincentive for innovation and continuous improvement. Economic incentives must align with ecological and social goals.

Weakened Accountability Framework

Compliance & Enforcement (C&E) is a foundational pillar of the *Forest and Range Practices Act* (FRPA). However, capacity for C&E has eroded while its oversight mandate has expanded. Budget cuts have stretched an already thin system at precisely the moment when the sector grapples with complex, overlapping policy changes and heightened public expectations. The Board's independent oversight complements and strengthens C&E, but cannot substitute for adequate provincial capacity. This weakening threatens the accountability framework that underpins FRPA.

Barriers and Opportunities for PFAC Consideration

Against this backdrop, the Board identifies four barriers that stem from these systemic issues. Addressing unclear objectives, misaligned incentives, fragmented oversight, and the absence of landscape-level systems would directly enable progress in each of the areas outlined below. These long-standing gaps, documented across multiple Board reports, also point to practical opportunities for strengthening the Province's approach to stewardship and planning.

1. Watershed-Level Assessment and Cumulative Effects Management

Problem: Watershed assessments do not precede harvesting activities in most watersheds. Clear provincial thresholds for acceptable risk to water and downstream values do not exist.

Why it matters: Without risk thresholds, land-based decisions cannot reliably account for ecological limits or cumulative impacts. Individual licensees should not be determining acceptable risk—government must.

Opportunity: Establish legal requirements to manage for cumulative effects on water and provide clear provincial risk thresholds to guide decision-making. This would safeguard water and downstream values, protect the public interest, and ensure that cumulative effects on water are consistently incorporated into land-based decisions.^{1,2}

¹ [FPB Special Report 39 – Cumulative Effects: From Assessment Towards Management](#)

² [FPB Special Report 60 – Forest Practices and Water: Opportunities for Action](#)

2. Legal Clarity Between Objectives and Practices

Problem: Objectives set out what the public expects from its land base, but they are often vague. This lack of clarity creates uncertainty for planners, licensees, and communities.

Why it matters: Vague objectives weaken alignment across plans, undermine plan holder accountability, and prevent evaluation of whether practices achieve intended results.

Opportunity: As forest landscape plans are developed and implemented, clarify and strengthen provincial objectives so that plans and practices align with the Province's expectations. Measurable and enforceable outcomes improve accountability and provide a stable foundation for coordinated land-based decision-making.^{3,4}

3. Resilient Forest Management

Problem: Landscape fire management remains underutilized, despite its importance in reducing wildfire risk and supporting ecological integrity.

Why it matters: Restoring landscape resilience is essential to ecosystem health, biodiversity, and a viable forest industry. The lack of landscape resilience from wildfire is perhaps the most urgent issue creating risk to environmental values and degradation.

Opportunity: Integrate landscape fire management into planning frameworks to support long-term forest resilience. Align policies and programs to reflect the ecological role of fire. This would help restore resilient landscapes and support climate-adapted management across government.^{5,6}

4. Landscape-Level Monitoring and Adaptive Management

Problem: Coordinated landscape-level monitoring systems that support adaptive management do not exist.

Why it matters: Effective decision-making requires the ability to track outcomes at the landscape level for values such as water, biodiversity and timber supply. Coordinated monitoring is needed to respond to changing conditions and incorporate the latest information in a timely manner.

Opportunity: Develop coordinated landscape-level monitoring systems that enable adaptive management and transparent evaluation of results. Strengthened monitoring and frequent evaluation of its findings would allow both government and professionals to track outcomes more effectively, ensure practices achieve intended results and improve future decisions.⁷

³ [FPB Complaint Investigation 235 – Management of Biodiversity in the PG TSA](#)

⁴ [FPB Special Report 57 – Forest Stewardship Plans: Are They Meeting Expectations?](#)

⁵ [FPB Special Report 61 – Forest and Fire Management in BC: Toward Landscape Resilience](#)

⁶ [FPB Special Investigation 56 – Help or Hinder? Aligning Forestry Practices with Wildfire Risk Reduction](#)

⁷ [FPB Special Investigation 40 – Community Watersheds: From Objectives to Results on the Ground](#)

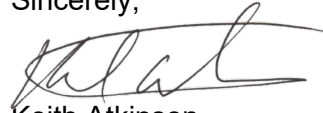
A Clear Path Forward

To provide the coherent, stable direction that the forest sector needs, the Province must clearly describe what it wants from its forests. The Board believes a shift to proactive, science-based stewardship that emphasizes ecological health, cultural values, and community benefit is necessary to improve the resilience of BC's forests.

The Board envisions a future in which government direction is coherent, and land-based decisions are grounded in clear and enforceable objectives. Central to that future is the goal of restoring and maintaining landscape resilience. BC's forests can support ecological integrity, cultural values, and community well-being in a changing climate—but only with systemic reform.

Progress on these priority areas will depend on addressing the underlying systemic conditions identified earlier in this letter—particularly clarity of objectives, alignment of incentives, and coherent, landscape-level governance. The Provincial Forest Advisory Council is well positioned to recommend these structural changes. The Board encourages PFAC to prioritize managing cumulative effects on water, clarifying provincial objectives, integrating landscape fire management, and establishing coordinated landscape-level monitoring. The Board's evidence—spanning decades of audits, investigations, and special reports—is available to support PFAC's recommendations.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Keith Atkinson', with a long horizontal flourish extending to the right.

Keith Atkinson

Chair, Forest Practices Board