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Sierra Club BC feedback on B.C.'s Climate Preparedness and Adaptation Draft Strategy/Phase 1 Actions

Thank you for inviting feedback on the proposed actions for 2022-25 presented in the draft strategy and draft guiding principles.

Our comments are not covering the entire draft strategy and principles. They are focusing on two issues:

- The overall lack of urgency in the draft documents, the importance of speeding up and strengthening climate action (both to reduce emissions and prepare for impacts we can no longer prevent), honesty about B.C.'s current emissions trend and implications on impacts.
- The largely ignored role of intact forests in reducing climate impacts and the missed opportunity to highlight the potential to reduce many of these severe risks by fully implementing the promised paradigm shift in forest management outlined in the Old Growth Strategic Review (OGSR).

Overall lack of urgency

The draft strategy covers many relevant topics and strategies in the context of climate preparedness and adaptation but it severely lacks in terms of urgency and honesty considering the severe impacts that can already be observed in B.C., such as the heat dome, heat waves and wildfires of the summer of 2021 (with hundreds of people killed in British Columbia by the heat dome alone), and similar disasters unfolding in many other parts of the world at the same time.

While we must prepare urgently for climate impacts with catastrophic potential, the severity of impacts that are already here show that there are limits in terms of what we can prepare and adapt to. Unless the B.C. government quickly corrects course and does its part to actually dramatically reduce climate pollution instead of increasing it, there will be little hope to prevent catastrophic climate change.

Preparing and motivating people in B.C. for much greater climate action begins with a more honest assessment of the climate emergency and the current provincial emissions trajectory. The draft strategy is a crucial opportunity to describe why the province must reduce emissions faster, for example by including the key findings from the 2018 Special IPCC report, showing the frightening differences in impacts between 1.5 and 2 degrees of warming, and from the first part of the 6th IPCC assessment report released this month, which shows in much greater detail how quickly the window to act is closing.

It would be dishonest for the province not to include information about B.C.'s current climate pollution trends and targets and thereby avoid admitting that they are inconsistent with the ambition needed to prevent climate breakdown, and what the international community committed to when they endorsed the Paris Agreement goal to reduce warming below or close to 1.5 degrees.

The draft discusses strategies for 2022-25, often introducing them in a cautious way, with words like 'consider' or 'explore'. The climate emergencies of 2021, however, show that this is not reflecting the adequate urgency we need to prepare for the deadly impacts that have already arrived.

The entire strategy requires a complete overhaul to meet a much higher bar in terms of detailed steps, funding commitments and expedited timelines to have at least a fighting chance to be better prepared and have a higher likelihood to prevent loss of lives and ecosystems, homes, places, infrastructure and jobs as a result of catastrophic climate impacts.

The role of forest protection and reforming forestry practices

The draft strategy reviews options to protect and restore ecosystems but avoids discussing the underlying causes and the dramatic regulatory and policy changes needed to stop the ongoing destruction of the threatened ecosystems we depend on.

There is overwhelming evidence that countless species and many ecosystems are already at the brink of disappearing because of the cumulative effects of habitat destruction, now combined with climate change impacts that threaten the web of life including the future of our species.

Incremental steps towards increasing protection and restoring degraded ecosystems without outlining specific steps and timelines to end economic activities that destroy the life support systems we depend on (and reduce climate impacts) are insufficient to address the climate and extinction crises.

Forest protection and forest management are a dramatic example. An independent report called 1ntact forests, safe communities' released by Sierra Club BC¹ in January 2021 looks at the relationship between forest management and severe climate impacts expected across B.C.

It shows that by working together, Indigenous and non-Indigenous decision-makers can mitigate climate-related disasters like flooding, droughts, fires and heat waves by swiftly reforming B.C.'s forestry practices, applying Indigenous knowledge to forest-related decisions, and protecting and restoring intact forests before the climate crisis worsens.

The report, written by Dr. Peter Wood, found that industrial logging has a significant impact on the severity and frequency of a number of climate risks for B.C. communities. B.C.'s 2019 Strategic Climate Risk Assessment identified 15 climate risks, including several risks with the potential to create catastrophic impacts.

This extensive provincial assessment, however, completely ignored that the majority of these risks are influenced by logging practices. The Wood report outlined in great detail how clearcutting worsens

¹ https://sierraclub.bc.ca/intact-forests-safe-communities-sierra-club-bc-report/

several climate risks and described this issue as a major blind spot that undermines the effectiveness of the Province's response to global heating.

In comments shared with media in response to Dr. Wood's report, the B.C. government stated that it would consider the report and referred to CleanBC and provincial tree planting programs as examples of related initiatives. The response suggested that the provincial government did not carefully consider the content of the report which focuses primarily on the importance of protecting intact, old forests (not tree planting), primarily in the context of reducing climate impacts (not reducing emissions, another benefit discussed in many other reports).

We expected consideration of the extensive scientific review and recommendations contained in Dr. Wood's report as well as the crucial recognition of the climate risk mitigation benefits of full implementation of the 14 recommendations of the Old Growth Strategic Review in the draft strategy.

Yet, reflecting the ongoing 'talk and log' state of affairs in the context of implementation of the 14 recommendations, B.C.'s draft Climate Preparedness and Adaptation Strategy only refers to "explore climate change resilience in policy and management options informed by the independent panel report on old-growth."

The Wood report outlined with overwhelming scientific evidence the urgency to protect intact forests and reform forestry practices to reduce a significant number of severe climate impacts. It also showed that the best way to accomplish this is by following through on the Premier Horgan's promise to implement all of the recommendations from the 2020 Old Growth Strategic Review.

It is not too late to for the B.C. government to change course and take the climate crisis seriously. One opportunity to demonstrate political will on climate action is to show new commitment to the full implementation of the OGSR, as promised by Premier Horgan in the fall of 2020. This means making up for delays by announcing logging deferrals for all at-risk forests using OGSR criteria this summer, announcing adequate funding for Indigenous-led conservation solutions and forestry transition, as well as a work plan with milestones consistent with the three-year OGSR framework.

Conclusion

Sierra Club BC is urging the B.C. government to drastically speed up and strengthen climate action, both to reduce emissions and prepare for impacts we can no longer prevent. This will require much stronger efforts to end fossil fuel pollution faster, establish stricter targets and expand CleanBC.

B.C.'s Climate Preparedness and Adaptation Draft Strategy needs a complete overhaul to reflect that we are already in an emergency. A strengthened strategy must include implementation of ambitious actions that actually protect communities, funding commitments and timelines to allow at least a fighting chance to prevent loss of lives and ecosystems, homes, places, infrastructure and jobs as a result of catastrophic climate impacts.

The B.C. government has an opportunity to demonstrate renewed political will to take the climate crisis seriously by making the full implementation of the OGSR recommendations a priority, offering a beacon of hope and a blueprint for real climate action in all sectors, from phasing out extraction of fossil fuels to implementation of a Climate Preparedness and Adaptation Strategy that makes a difference today, before it's too late.

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