



**SIERRA  
CLUB BC**

301-2994 Douglas Street  
Victoria, B.C. V8T 4N4

T (250) 386-5255  
F (250) 386-4453

E [info@sierraclub.bc.ca](mailto:info@sierraclub.bc.ca)  
W [www.sierraclub.bc.ca](http://www.sierraclub.bc.ca)

## **Interior Forest Sector Renewal**

**Sierra Club BC submission, October 11, 2019**

[FP.engagement@gov.bc.ca](mailto:FP.engagement@gov.bc.ca)

**Jens Wieting, Senior Forest and Climate Campaigner, [jens@sierraclub.bc.ca](mailto:jens@sierraclub.bc.ca)**

Sierra Club BC welcomes the invitation by the BC government to provide input on the 'Interior Forestry Renewal' discussion paper.

We are writing in the context of the government objectives around resilient communities and workforce, reconciliation with Indigenous Communities and sustainable forest management. Our input and recommendations are related to all six forest policy areas listed on the provincial government website.

We believe that none of these policy areas should be discussed without fully considering the role of BC's forests and forestry in contributing to the climate crisis, and the degree to which the climate crisis threatens Interior communities and the forestry sector.

We are extremely concerned about the superficial consideration in the Interior Forest Sector Renewal discussion paper of forest health and ecological integrity, over-harvesting of BC's Interior forests, and the dramatically growing forest carbon emissions and rapidly worsening climate impacts. The paper focuses primarily on economic aspects of forestry in the Interior, with insufficient attention on issues such as sustainability and carbon emissions from forestry operations.

Our input and recommendations focus on some of the missing crucial aspects in the discussion paper: The true extent of the crisis hitting BC's Interior forests and forest sector, as a result of the double whammy of over-harvesting and climate impacts, as well as the implications for environmental services and benefits, in particular the dramatic shift of Interior forests from carbon sink to carbon source. There is no path towards a 'vibrant, diverse' forest sector, without considering the urgent context of climate change.

### **Interior forestry renewal must address urgency to defend communities from climate impacts**

BC, particularly in the Interior, has experienced unprecedented climate impacts in the last several years, and must prepare for more catastrophic wildfires and other climate impacts<sup>1</sup>, with degraded landscapes at times dried out and at other time flooded, and that are less resilient as a result of decades of industrial logging and practices like chemical spraying of deciduous trees that are more fire resistant.

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<sup>1</sup> <https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/prelim-strat-climate-risk-assessment.pdf>

While more governments are acknowledging that we are in a climate emergency, few are discussing the urgency to stop destroying forests—the last line of defence for many communities amid worsening droughts and floods.

Any discussion about future forestry must recognize that protecting and restoring resilient forests will both slow climate change and help defend the safety of communities.

As the climate shifts into uncharted territory, only intact forests can buffer the impacts—not clearcuts and young tree plantations. Intact forests are essential for clean air and water, species habitat, long term forestry jobs and protecting communities from floods and disasters.

The climate emergency means we need to protect the intact natural forests that remain resilient, particularly carbon rich old-growth forests. In some forest landscapes, cautious intervention like thinning to build resiliency and controlled burns will be necessary. Clearcutting and logging forests on short cycles exacerbates global heating, and is never the right answer. We have to store carbon, not release it, and natural intact forests do that best.

The Intergovernmental Panel on Climate Change (IPCC) projects that without unprecedented action, by 2040 the world will heat by about 1.5 degrees Celsius compared to pre-industrial times. As a consequence of global warming of just one degree, water vapour in the atmosphere has already grown seven per cent and changes in the jet stream are responsible for longer lasting weather patterns, causing longer and more extreme flooding and droughts.

These trends will only stop once the world economy has completely decarbonized. However, impacts to BC communities can be significantly slowed by protecting intact natural forests, particularly large landscapes, to moderate local climates. Right now, B.C. communities are at increasing risk of climate impacts worsened by large-scale clearcutting and destructive practices like slash burning that add to carbon emissions, all of which are causing cumulative damage in many Indigenous territories.

Moving away from destructive forestry practices must be part of provincial climate action to reduce carbon pollution. Careful planning and logging, leaving more large trees standing, means more jobs and less ecosystem damage per cubic metre of wood cut.

There are two immediate first steps the B.C. government can take, in the Interior and other parts of the province, to address the forest and climate emergency.

- The first is to establish a “climate impact test” for existing logging plans. Every hectare of newly clearcut forest leaves communities more vulnerable to flooding, wildfires and loss of clean water. Logging plans must be adjusted or cancelled to address this crisis.
- The second is to overhaul B.C.’s legislation and regulations governing forestry. The Forest and Range Practices Act (FRPA) review currently underway must result in a paradigm shift from a timber-based approach to a principled ecosystem-based approach to restore the carbon storage function and life support systems provided by forests, give species and ecosystems a chance to adapt to the changing climate, and reduce deadly dangers for communities.

Sierra Club BC shared detailed recommendations regarding needed changes in FRPA, together with 27 other groups<sup>2</sup>. Implementing these recommendations will protect the public interest. Anything less will fuel global heating and privilege short-term profits for multinational timber companies.

### **BC's growing forest emissions**

In January 2019, Sierra Club BC released the report Hidden, Ignored and Growing<sup>3</sup> on how British Columbia's forests are now releasing more planet warming carbon dioxide per year than all other provincial sectors combined. We also warned that these forest emissions<sup>4</sup> are largely ignored because they are not counted as part of B.C.'s official emissions in provincial greenhouse gas inventories. In September we found our projections confirmed in new data released by the BC government<sup>5</sup> showing that uncounted forest emissions are now three times greater than BC's official emissions.

Forest emissions were not mentioned in the provincial media release summarizing the official provincial emissions, nor was the scope of BC forest carbon loss mentioned in the Interior Forest Renewal discussion paper, despite the fact that the IPCC warned that we have only 11 years to take action and dramatically reduce emissions to avert catastrophic climate change impacts<sup>6</sup>.

B.C.'s forests became sources of carbon – releasing more carbon than they absorb - in the early 2000s. These massive and growing forest emissions are a result of destructive logging, pine beetle outbreaks and wildfires.

The situation has gotten much worse in the last two years. Both the 2017 and 2018 wildfires burned more than 1.2 million hectares of the province, eight times more than the ten-year average.<sup>7</sup> According to the new data B.C.'s 2017 fires caused 176.5 million tonnes of CO2 emissions.<sup>8</sup> The number for 2018 will be similar. The most recent annual inventory<sup>9</sup> shows B.C.'s official emissions were about 65 million tonnes of carbon dioxide in 2017 (a 1.2 percent increase over 2016). Uncounted annual emissions from destructive logging<sup>10</sup> were about 42 million tonnes. In addition, roughly 4 million tonnes of carbon pollution are released annually from slash burning. Because wildfire emissions have skyrocketed, BC's forest emissions are now higher than 200 million tonnes (42M from logging + 4M from slash burning + 176M from wildfires – 20M sequestration).

Forest emissions are not counted as part of official emissions due to international agreements. However, this does not mean we should hide forest emissions as if they don't exist. This issue can be addressed by producing an additional provincial report on forest carbon emissions to inform decision makers and decision-making processes like the Interior forest renewal process.

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<sup>2</sup> Input from 28 NGOs regarding improved forest management and increased conservation submitted July 2019

<https://sierraclub.bc.ca/wp-content/uploads/FRPA-Joint-ENGO-Submission.pdf>

<sup>3</sup> <https://sierraclub.bc.ca/wp-content/uploads/SCBC-Forest-Emissions-Report-Jan-19.pdf>

<sup>4</sup> <https://sierraclub.bc.ca/bcs-forests-full-decade-of-carbon-loss>

<sup>5</sup> <https://news.gov.bc.ca/releases/2019ENV0097-001737>

<sup>6</sup> <https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>

<sup>7</sup> <https://www2.gov.bc.ca/gov/content/safety/wildfire-status/about-bcws/wildfire-statistics/wildfire-averages>

<sup>8</sup> <https://www.cbc.ca/news/canada/british-columbia/it-s-alarming-wildfire-emissions-grow-to-triple-b-c-s-annual-carbon-footprint-1.4259306>

<sup>9</sup> <https://www2.gov.bc.ca/gov/content/environment/climate-change/data/provincial-inventory>

<sup>10</sup> Emissions related to logging are reported as 'Emissions from Decomposition of Harvested Wood Products,' despite the fact that the majority of these emissions occur as a result of common destructive logging practices that leave behind massive amounts of wood waste.

In the absence of such a report, it is paramount to ensure that all available data, including on forest carbon emissions, inform a renewal path in the Interior that truly addresses the climate crisis. Sierra Club BC's forest carbon emissions report<sup>11</sup> can provide more information on the missing data needed to inform the Interior forestry renewal process. B.C.'s growing forest emissions must be addressed with a suite of urgent steps to reduce them as much as possible.

### **Reform forest management in the Interior with a carbon lens**

The Interior forest sector renewal discussion must be guided by the overarching goal to restore the natural forest carbon sink function, or, if this is not possible, to reduce emissions as much as possible. Unless the province does its part to contribute to the global emissions reductions needed based on the latest science summarized by the IPCC, all ecozones of Canada will shift into uncharted territory in coming decades and will undermine the health of all of BC's forests and forest dependent communities.

The urgency of the climate crisis requires that we prioritize actions that have immediate benefits. Emissions from logging carbon rich old-growth<sup>12</sup> could be reduced quickly by using some of the solutions developed in the Great Bear Rainforest<sup>13</sup>—as the NDP promised to do in their 2017 election platform—combined with support for First Nations' land use planning and a rapid transition to improved management of second-growth forests. These solutions are needed for old-growth forests across the province.

In particular, a report released by the University of Victoria's Environmental Law Centre (ELC)<sup>14</sup> in July recommended the BC government set thirty per cent base level protection of old-growth ecosystems and intact forests across the province as part of the provincial government's amendments to provincial forestry regulations.

Tree planting initiatives have potential benefits for the climate—but these benefits will not be significantly realized for decades. In contrast, protection of carbon rich old-growth forests has immediate benefits for the climate, helping us reduce our carbon emissions in the short term.

Research in Oregon showed that clearcutting forests in the Pacific Northwest creates "carbon sequestration dead zones" that emit more carbon than they absorb for about 13 years.<sup>15</sup> This is a typical time span for many forests in North America required for young trees to reach a size where their ability to sequester carbon matches the ongoing high carbon losses that result from destructive logging after a clearcut has occurred. Yet the special report released in October 2018 by the International Panel on Climate Change (IPCC) highlights the need for massive emission reductions within the next 11 years.<sup>16</sup> To do so will require phasing out destructive logging and reforming forestry in a manner that doesn't disrupt the carbon sink function of standing forests.

Forest sector renewal discussion must consider the urgency to mitigate the loss of forest carbon storage and ability of forests by stopping unnecessary damage to living trees, ensuring longer harvesting cycles and ending practices such as slash burning that are extremely damaging to the climate and human health.

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<sup>11</sup> <https://sierraclub.bc.ca/wp-content/uploads/SCBC-Forest-Emissions-Report-Jan-19.pdf>

<sup>12</sup> <https://sierraclub.bc.ca/7-myths-about-forests-carbon-and-climate-change/>

<sup>13</sup> <https://coastalfirstnations.ca/our-land/carbon-credits>

<sup>14</sup> <https://sierraclub.bc.ca/university-of-victoria-environmental-law-centre-report-calls-for-a-minimum-of-thirty-per-cent-old-growth-protection-across-bc/>

<sup>15</sup> [http://www.cof.orst.edu/cof/fs/turner/pdfs/turner\\_env\\_man\\_2004.pdf](http://www.cof.orst.edu/cof/fs/turner/pdfs/turner_env_man_2004.pdf)

<sup>16</sup> <https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>

In addition, ending the large scale spraying of thousands of hectares of deciduous stands (e.g. aspen, alder and birch) with glyphosate, and allowing more deciduous trees to grow,<sup>17</sup> can help reduce the risk of wildfires, reduce emissions, increase carbon sequestration, provide benefits to wildlife and improve several environmental services impaired by climate impacts.

Safeguarding at least some degree of the natural life support systems and carbon sink function of Interior forests will require leadership, funding and innovation. The BC government can support community well-being and a diverse economy - including long-term forestry jobs – by shifting subsidies offered to the fossil fuel industry to instead support the forestry sector and to finance conservation solutions. These are needed as part of the process of modernizing regional land use plans with Indigenous Nations on a government-to-government basis. Truly protecting the web of life will also require new protected areas and allowing some younger forests to grow old again.

These steps are needed for both public and private lands and must respect Indigenous rights and jurisdiction. The B.C. government can partner with the federal government to support those First Nations in talks with the federal government who are seeking new Indigenous protected area designations.

To save good long-term forestry jobs, the Province should immediately ban on all exports of raw logs from old-growth forests and increase taxes on log exports from second-growth forests to encourage investment in domestic mills. We also need support for more value-added manufacturing jobs in rural and Indigenous communities.

It is not too late to save some of the remaining relatively intact forest landscapes in the Interior, their cultural values and benefits for clean water, pure air and a stable climate, but the decision to transition to truly sustainable forest management cannot wait. Creating more jobs with less damage per cubic metre of wood deserves full provincial support. This will allow for both wood products and capturing more carbon in our forests than is lost as a result of logging and climate impacts.

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<sup>17</sup> <http://stopthespraybc.com>