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Cc:

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To the BC Timber Sales Review Team

Re: BC Timber Sales Review

Sierra Club BC welcomes the opportunity to provide comments on the 2025 BC Timber Sales Review. However, we are very concerned that the 'reason for a review' outlined on the government website has a narrow focus on meeting "the evolving needs of the forest industry" and reallocation of wood volume.

A recent [independent study](#) by environmental consulting firm ESSA Technologies confirmed that timber bias is not in the public interest. The study found that protecting the most at-risk old-growth forests in just two large Timber Supply Areas (TSAs) in B.C. would result in \$10.9 billion CAD worth of economic benefits for society over 100 years compared to business-as-usual logging. The findings also revealed that fully protecting old-growth forests in these two TSAs would generate \$43.1 billion in net economic benefits over the next century. Together, the two areas contain about 10 percent of B.C.'s total old-growth forests mapped in 2021. Carbon storage and sequestration is the largest factor, with additional benefits from tourism, recreation, and non-timber forest products. Many additional benefits of protecting old-growth forests like water quality and supply, flood mitigation, species habitat, cultural and educational values were not analyzed. Initiatives like the BCTS review should consider information like this report.

Relevant OGSR recommendations

The BC government committed to implementation of the paradigm-shift in forest stewardship making biodiversity a priority outlined in the Old-Growth Strategic Review (OGSR) in 2020 and the Old-Growth Action Plan in 2024. BCTS is in control of 20 percent of logging in the province and this provides an opportunity to lead forestry reform in a manner that addresses the biodiversity and climate crises, respects the rights of Indigenous Peoples and responds to the economic crisis caused by decades of industrial overcutting.

A meaningful review of the role of BC Timber Sales should be grounded in recognition of the industrial degradation of large swaths of forests in B.C. as a result of excessive clearcutting, a crisis clearly reflected in the 2020 OGSR and the 2021 TAP maps.¹ As the Premier stated in one of his 2022 mandate letters "short-term thinking" has led to "exhausted forests". Industrial clearcutting has impacted biodiversity, reduced the ability of

¹ In the absence of comprehensive government updates on the state of the forests in B.C., Sierra Club BC shared a high-level update in the fall 2024 (["Forests in BC are entering uncharted territory"](#))

forests to serve as a [carbon sink](#) and [exacerbated climate impacts](#) like droughts, floods and wildfires, urgent issues that require response but are not mentioned on the BCTS review website.

It is not too late to change course and transform BCTS into an agency with a holistic vision and the potential to lead the paradigm-shift.

The following OGSR recommendations are of particular relevance for a new direction to guide a reformed agency (excerpts from page 15 of the OGSR):

On conditions required for change:

Recommendation 5. Provide the public with timely and objective information about forest conditions and trends.

For immediate response:

Recommendation 6. Until a new strategy is implemented, defer development in old forests where ecosystems are at very high and near-term risk of irreversible biodiversity loss.

Recommendation 7. Bring management of old forests into compliance with existing provincial targets and guidelines for maintaining biological diversity.

For improving management:

Recommendation 8. Establish and fund a more robust monitoring and evaluation system for updating management of old forests.

Recommendation 12. Create a silviculture innovation program aimed at developing harvesting alternatives to clearcutting

Biodiversity and Ecosystem Health Framework

Recommendation 2 of the OGSR – “Declare conservation of ecosystem health and biodiversity of British Columbia’s forests as an overarching priority and enact legislation that legally establishes this priority for all sectors” - is widely regarded as the potentially most consequential OGSR recommendation. After extensive engagement, the BC government developed a draft Biodiversity and Ecosystem Health Framework that should be used as guidance for the BCTS review.

Sierra Club BC shared a submission to strengthen the draft framework with 8 recommendations. The following are also relevant for the BCTS review

3. Ensure immediate interim measures that safeguard high conservation values;
4. Establish binding Ecosystem-Based Management targets, without loopholes;
8. Comprehensive integration of biodiversity and climate goals (mitigation and adaptation).

More details can be found in our [submission](#).

The framework and our submission discuss the creation of a Biodiversity and Ecosystem Health Office. While discussions continue, there is an opportunity to model such an office within BCTS and designate staff to ensure biodiversity and ecosystem health become a priority within BCTS.

We also highlighted alignment of the BEH Framework, the Nature Agreement, conservation financing opportunities and related commitments in our submission. It is important that all parts of the BC government

support these commitments. Without a 'whole of government' approach, we will continue to see one part of government working to protect endangered ecosystems and habitat, and another part of government continue business as usual as we have seen with BCTS, despite some of the impacted ecosystems and species nearing collapse.

A disturbing example for negative impacts of business as usual by BCTS is the Walker watershed in the Robson Valley, known as one of the few remaining largely intact inland temperate rainforests of the province and critical wildlife habitat. Despite these high conservation values and growing public opposition, BCTS appears to defend its plans for new clearcuts. We are urging BCTS to drop these proposed cutblocks and support conservation solutions for this irreplaceable watershed.

In closing, Sierra Club BC is thankful to Joe Karthein and the *Save What's Left* group for the tireless work and extensive documentation of BCTS failure to uphold the public interest and support a shift in forest stewardship. We agree with the findings and recommendations of their report "Public Forests, Public Trust: Reforming BC Timber Sales in a Time of Ecological and Economic Urgency"

Please let us know if you have any questions and we hope that the BCTS review will support the urgently needed paradigm-shift in forest stewardship, despite the initial narrow focus.

Sincerely

Jens Wieting, Sierra Club BC