

Board Bulletin, Volume 7 – Forest Stewardship Plan Review: A Public Responsibility

This bulletin is the seventh in a series of Forest Practices Board bulletins describing new aspects of forest legislation, practices and trends, and their implications for forest stewardship. These bulletins are intended to foster discussion and to improve understanding of forest practices.

This bulletin is about the new approach to public consultation under the *Forest and Range Practices Act* (FRPA). Everyone - forest companies, the public and government - has a role in ensuring that public review and comment is effective. However, government has placed increased responsibility on the public for making the process work. The Board has produced this bulletin to help the public to understand how to have effective input to forestry plans under the FRPA process.

FRPA took effect in 2004, but most forest companies are continuing to operate with forest development plans approved under the previous Forest Practices Code. That will end in the next year or so as those companies switch to forest stewardship plans approved under FRPA. The new consultation process will come into effect as these plans are prepared in the coming months.

Forest stewardship plans must be available for public review and government approval. This helps British Columbians stay informed about forest practices in their areas of interest. Normally, **the public has 60 days to review and provide written comments about a proposed forest stewardship plan.** The forest company must consider the comments, and may choose to change its plan based on the input it receives. When it seeks approval of its forest stewardship plan from government, the company must also submit a copy of each written comment, and describe for government any changes made to the plan in response to the comments received.

Unlike forest development plans, **forest stewardship plans do not have to include a map of proposed cutblocks and roads.** A forest stewardship plan can simply identify one large area in which logging may occur over the next five years. Forest practice strategies or results must be in the plan, but they can be complicated and difficult for the general public to understand. Forest stewardship plans without details or measurable results provide no definite information about what forest practices will occur where and when. In other words, instead of responding to specific logging proposals in a forest stewardship plan, **the public will have to identify all of its concerns for the entire area of potential development, which can be quite large - over 300,000 hectares in many of the plans submitted so far.**

A forest company may choose to put detail in supporting documents that are not part of its forest stewardship plan. However, forest companies need not consider public comment about such documents, or follow the practices described in them.

Under FRPA, **forest companies show the approximate location of cutblocks and roads in a document called a site plan.** Site plans must identify how the intended results or strategies described in the forest stewardship plan apply to the site. A **site plan usually indicates a company's follow-through on any commitments** arising from public comment about its forest stewardship plan, as well as its plans to protect public values where no such comments or commitments were made.

Although a **site plan must be available for public review on request, there is no requirement to inform the public that a site plan is available.** FRPA provides **no formal review and comment procedure for site plans**, nor any requirement to resolve public concerns about a site plan. **Site plans do not require government approval under FRPA;** forest companies simply advise government that harvesting is about to begin. Whether public concerns about specific forest activities are resolved is now a matter of negotiation between the public and the forest companies.

That means more work for the public in dealing directly with forest companies, with no recourse to government. Under FRPA, it is up to individual British Columbians to ensure that their concerns, as expressed in the forest stewardship plan review and comment procedure, are eventually and adequately accommodated on-the-ground.

To achieve this goal, **the Board recommends that members of the public review forest stewardship plans and make comments about any issues or concerns they may have.**

Ask the forest professional for written commitments at the site plan stage. If a commitment is not adhered to, the Association of BC Forest Professionals can be asked to intervene and ensure the conduct of the professional is appropriate.

Carefully prepared comments will **help forest companies develop strategies or results that show exactly how the concerns will be addressed** at the site level, if the company decides to do so. Public comments on FSPs should also **include a formal request** that the company provide an opportunity to **comment**

on site plans in their area of interest; **before those plans are signed by a forest professional.** Otherwise, the public will have to contact the forest company on a virtually daily basis to check whether such plans are in development.

Effective public review and comment is important under FRPA. Forest stewardship plans have a five-year term but can be extended to ten years by government. Therefore, **the FSP is the public's only opportunity to provide formal comment on forest practices in a potentially large area for five to ten years.** It is too early to tell whether the public will be content with these reduced consultation provisions.

Effective consultation is dependent on the efforts and relationships of the individuals involved. **Members of the public must now make their own efforts to stay informed, must focus their comments on substantial matters of influence to forest planning, and must follow-up with**

forest companies at the site plan stage to ensure that provided input has been satisfactorily addressed. For effective public consultation under FRPA to succeed, British Columbians must make their interests and concerns known, and forest companies and professionals need to demonstrate a responsive approach to those public interests and concerns.