

August 15, 2017

Honourable Catherine McKenna  
Minister of Environment and Climate Change  
200 Sacre-Coeur Boulevard  
Gatineau, QC K1A 0H3

Honourable Jim Carr  
Minister of Natural Resources Canada  
580 Booth Street – 21st Floor, Room C7-1  
Ottawa, ON K1A 0E

Re: Caribou Recovery in British Columbia

Dear Ministers:

On behalf of the BC Council of Forest Industries (COFI), I am writing to you about the recovery strategies for caribou in British Columbia and to offer our view on the approach to achieving the intended outcome of caribou recovery and sustainable populations within the province. In summary, our view is that the approach to caribou survival should be based on science and research; it should be focused on successful outcomes, and not limited to habitat protection; and it should consider all values across the landscape including socio-economic implications.

### **Background on the B.C. Forest Industry**

By way of background, the forest industry has long been the cornerstone of the provincial economy and one of the largest employers in B.C. 145,000 jobs in B.C. depend on the forest sector, and we are the primary employer in many communities throughout the province with 140 communities in B.C. dependent on the industry. In B.C., we take great pride in our commitment to being a world leader in sustainable forestry and recognize that healthy forests are part of the ecological and natural heritage of our land base.

### **Southern Mountain Caribou in B.C.**

B.C. is home to four populations of Woodland Caribou – Boreal, Northern Mountain, Central Mountain, and Southern Mountain. Southern Mountain Caribou (as defined in the 2014 federal recovery strategy) occur in the southern two-thirds of B.C. and in west-central Alberta and are listed as threatened under the federal Species at Risk Act (SARA).

To date, B.C. has undertaken numerous initiatives designed to protect and recover Southern Mountain Caribou including the preservation of 2.2 million hectares of critical habitat. Unfortunately, the population continues to decline as evidenced by those herds found in Wells Gray Provincial Park, Jasper and Banff National Parks, all protected areas.

Caribou recovery is predicated on much more than habitat preservation. Success requires the implementation of a wide range of initiatives including predator control, primary prey management, augmentation, adaptive management and the management of human interaction. It also requires collaboration between the federal and provincial government, as well as industry and other stakeholders in managing natural resources and wildlife where southern mountain caribou are found.

The forest sector and the provincial government are committed to working collaboratively with you and the federal government to restore the health of caribou populations, and we've seen an unprecedented amount of work initiated to sustain caribou in B.C. For example, forest companies have incorporated caribou survival into forest management plans, by undertaking inventories, studies and surveys and modifying planned work to work around caribou population and habitat.

In addition, the Province announced funding of \$27 million over the next three years to further enhance caribou recovery and to support two maternity penning projects to reduce the mortality of young caribou. We support these efforts and offer our view as follows:

- The BC Council of Forest Industries supports efforts by the provincial government to develop and enact provincial species at risk legislation, as the responsible jurisdiction for caribou protection and recovery. We also support the efforts of both governments to enter into a Section 11 conservation agreement under SARA. This approach would allow for a provincially-focused mandate for the survival of caribou herds in B.C.
- We support additional research into why some caribou herds are faltering, including assessing all causes of caribou decline including human and natural disturbance, climate change, predation, pathogens and disease.
- We also believe in research based recovery strategies that are focused on achieving successful outcomes, and do not rely on the simple measure of habitat protection whether successful or not.
- Finally, we ask that governments consider all values across the landscape including socio-economic impacts in assessing caribou recovery and protection strategies. These impacts include the constraints that would be placed on the timber harvesting land base that would ultimately impact the viability of local mills, jobs, and the communities that rely on our forest sector for their well-being.

The forest sector in B.C. is incredibly resilient, but it continues to face many challenges. We have faced multiple rounds of softwood lumber disputes including the current trade action which imposes approximately 28% duties on our lumber shipments to the U.S. We took a hit, but survived the 2008 housing crash in the U.S. and have been focusing our efforts on diversifying our markets overseas into

China and other Asian countries. We are facing reductions in the annual allowable cut due to the mountain pine beetle infestation in the B.C. interior and we are continuing to see pressures and measures that constrain the timber harvesting land base.

Even with these challenges, we continue to believe in our role as world leaders in sustainable forestry. We believe we can play a role in supporting caribou recovery and survival and look forward to working with both the federal and provincial governments in determining a successful path forward.

I look forward to discussing this issue further with you, at your convenience.

Yours truly,



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Susan Yurkovich  
President  
BC Council of Forest Industries

- cc. Hon. George Heyman, B.C. Minister of Environment and Climate Change Strategy  
Hon. Doug Donaldson, B.C. Minister of Forests, Lands, Natural Resource Operations and Rural Development  
Kim Rudd, Parliamentary Secretary to Canada's Minister of Natural Resources Canada  
Jonathan Wilkinson, Parliamentary Secretary to Canada's Minister of Environment & Climate Change Canada  
Stephen Lucas, Deputy Minister, Environment & Climate Change Canada  
Christyne Tremblay, Deputy Minister, Natural Resources Canada  
Mark Zacharias, Deputy Minister, Ministry of Environment and Climate Change Strategy  
Tim Sheldan, Deputy Minister, Ministry of Forests, Lands, Natural Resource Operations and Rural Development