

Ms. Kaaren Lewis  
Director, Ecosystems Branch  
Ministry of the Environment  
PO BOX 9338 Stn Prov Govt  
Victoria BC V8W9M1

August 31, 2011

Dear Ms. Lewis,

**RE: Report of the BC Task Force on Species at Risk, January 31, 2011**

The Association of BC Forest Professionals (ABCFP) has reviewed the Report of the BC Task Force on Species at Risk (task force) and would like to provide the following feedback.

As you are probably aware, in 2009 the ABCFP together with the College of Applied Biology issued a report for resource professionals on managing Species at Risk in BC. This report was intended to provide guidance to our diverse membership, while recognizing the complexity of the subject matter and the regulatory framework surrounding Species at Risk. The *Foresters Act* and the *College of Applied Biology Act* both hold members accountable for their professional judgment and decision making.

While it appears the taskforce did not consider aspects of various forest practices at the site level or reference the previous professional guidance on the subject of Species at Risk, the report does make some excellent recommendations that are consistent with the guidance we have provided to date. Specifically, the ABCFP would like to re-iterate its support for the following recommendations:

- Evaluating species at the ecosystem level (E1),
- Increased engagement with First Nations (FN2),
- Increased dialogue with resource industries (P2),
- Strengthening the CDC and conservation framework (M1, M2).

Our resource professionals include many of the skilled practitioners who plan and implement site and landscape-level activities on forest land. They frequently make decisions resulting in significant effects to both habitat protection and modification. This group includes forest planners, forest operations professionals and audit practitioners. It also includes other professionals from the forest industry, mining, tourism, or the energy sector that practice across our broad range of ecosystems. Given this diversity of interests within our membership and given the complexity of legislation relating to Species at Risk, success of the current approach has been mixed.

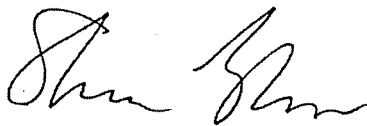
Concurrent with this, a variety of approaches and tools for managing habitat are being used across the province, but not in a consistent manner. If not addressed, this fractured approach could be one of the contributors to further declines in species diversity.

With respect to the task force report, we would like to identify a number of recommendations:

1. Ensure that the practitioners responsible for implementing Species at Risk legislation are involved in the evolution of policy and that their obligation to follow that legislation is referenced. Directing efforts towards this group will lead to better engagement and improved practice.
2. Provide resource professionals better clarity around legislation governing Species at Risk, given that the number of different species lists has caused ongoing confusion and has resulted in limited effectiveness on the ground. It is important for land and resource managers to understand which list of species is applicable to their plan and geographic area. Recommendation L1 in the report also speaks to "making a single ministry accountable for the delivery of conservation results...". Although recent changes to the natural resource ministries may have addressed this concern, the ABCFP agrees that this would also reduce confusion and should remain a point of focus for the task force.
3. Investigate improved tools that would increase the effectiveness for managing Species at Risk at both the stand and landscape level. A range of tools already exist, such as the BC species and ecosystem explorer, however some of these tools are difficult to apply to operational planning.
4. Add a recommendation to improve inventories and science for Species at Risk, as well as improving the transfer of this information to resource professionals.

We commend the Task force for its effort to date and trust that this feedback will be incorporated into its ongoing initiative to improve our management of Species at Risk. The ABCFP would be happy to further discuss any of the recommendations made here.

Sincerely,



Sharon L. Glover, MBA  
Chief Executive Officer  
Association of BC Forest Professionals