



Alberta Wilderness Association  
"Defending Wild Alberta through Awareness and Action"

Nov 23<sup>rd</sup>, 2022

Hon. Todd Loewen  
Minister of Forestry, Parks and Tourism  
Government of Alberta  
By e-mail: [FPT.Minister@gov.ab.ca](mailto:FPT.Minister@gov.ab.ca)

### **AWA Concerns with Alberta Forest Management**

Dear Minister Loewen,

Alberta Wilderness Association (AWA) is writing with concerns about forest management in our province, concerns that were intensified when we recently received the 2020 report prepared by the Alberta Forest Products Association (AFPA) entitled "Investigating Innovative Ways to Improve and Enhance the Forest Resources in Alberta" (hereafter "the report")<sup>1</sup>. As you know, this report was prepared to provide recommendations to former Minister of Agriculture and Forestry Devin Dreesen about how "to increase wood supply from Crown land, without jeopardizing sustainability."

Now that your ministerial mandate letter has been published, AWA requests a meeting with you to discuss the recommendations in the AFPA report and other provincial forestry issues. Some of AWA's key concerns include:

- Current forest policy is based on sustained yield rather than ecological sustainability
- Potential for inappropriate logging in parks and protected areas
- Allocating more unsustainable annual allowable cut
- Forest consultations are too narrow
- Intensive forest management threatens ecological integrity

As you may know, AWA is an Alberta-based conservation group with over 7,500 members and supporters. Founded in 1965, AWA is Alberta's oldest conservation organization seeking a network of representative protected areas throughout Alberta and good stewardship of Alberta's public lands, waters, and biodiversity.

Forests provide an important suite of values and services that reach far beyond the economic benefits of timber harvesting. Forests play an essential role in supporting biodiversity and wildlife including species-at-risk. Forests in the Eastern Slopes filter and release flows of water into Alberta's major rivers, preventing floods and providing clean drinking water for millions of Canadians downstream. Old forests

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<sup>1</sup> "Investigating Innovative Ways to Improve & Enhance the Forest Resources in Alberta" (Alberta Forest Products Association, April 27, 2020), [https://albertawilderness.ca/wp-content/uploads/2022/11/20200427\\_rp\\_afpa\\_to\\_abminister\\_forestresource\\_innovtn.pdf](https://albertawilderness.ca/wp-content/uploads/2022/11/20200427_rp_afpa_to_abminister_forestresource_innovtn.pdf).

in particular are important carbon sinks and their protection helps to prevent climate change. Under a changing climate, the services that forests provide are becoming more and more important. As extreme weather events become more frequent, we will rely more on the ability of forests to regulate flow of water, for example. Logging that is not sustainable from an ecosystem perspective threatens these forest values and therefore threatens the livelihoods of Albertans.

### **Forest policy based on sustained yield rather than ecological sustainability**

Alberta is not managing its forests sustainably. The current sustained timber yield model of forestry in Alberta has weak ecosystem targets, and poor public transparency around operators' performance against targets. Forest management also ignores cumulative impacts of multiple industrial activities in forests. This approach threatens forest ecosystem values. Evidence that Alberta's forestry practices are not sustainable is apparent in the decline of woodland caribou, old-forest birds, and native fish. These species that are reliant on healthy forest ecosystems act as indicators of anthropogenic impacts on forests. Their decline is indicative of unsustainable management of forests. Alberta's forest management practices also contribute to the global biodiversity crisis by creating a simplified forest structure in harvested forests compared to forests that have experienced natural disturbance, having very low structural retention in harvested areas, and suppressing growth of deciduous trees and other plants in regenerating forests. A broader concept of sustainable forestry, as understood by some other jurisdictions, is needed to reverse the damage done by unsustainable forestry and improve the health of Alberta's forests. This means taking an ecosystem-based approach to forestry, rather than a timber-based one.

AWA believes that many of the recommendations in the AFPA report overlook key social and environmental values, and would surely further exacerbate issues such as loss of biodiversity, loss of species-at-risk, and issues with water quality and quantity. For example, the report recommends re-evaluating what we consider sustained yield because of climate-related risks such as fire and insects. Though it is unclear what this means, it appears to mean that the forested land in the province may decrease over time given that there is a higher risk for natural disturbance, and that forestry shouldn't need to adjust by decreasing harvest levels. Given that the risk of climate-related forest disturbance is increasing, it is even more important to sustain forests as a priority. A decreasing forest land base is unsustainable from an ecosystem perspective and a yield perspective, regardless of whether losses come from natural disturbance or harvesting.

But the concept of sustained yield is itself at odds with modern concepts of forestry. According to the Ministerial Conference on the Protection of Forests in Europe (1993), sustainable forest management is:

"... the stewardship and use of forests and forest lands in such a way, and at a rate, that maintain their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the

future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.”<sup>2</sup>

Alberta cannot claim to be a world leader in sustainable forestry when, in 2022, we are still operating on a sustained yield model. Ecosystem values provided by forests have huge economic, social, and spiritual worth that is overlooked when the dominant focus remains timber volumes on the landscape. While the AFPA report states that “modernizing” the current sustained yield policy would provide security of tenure, AWA is concerned this would further erode security for wildlife, Indigenous rights holders, low impact recreationists, and other forest users.

The report recommends that “management for other values needs to include the entire landscape including the passive land base within the working forest and the forests in adjacent parks and protected areas”. However, most of the province’s forests are allocated to forestry, and ecosystem values have concomitantly declined: passive land base and protected areas are clearly not enough to sustain landscape ecological integrity. Considering that the report also suggests allocating currently unallocated forests and harvesting in protected areas, this reliance on parks and passive land base to compensate for ecosystem damage inflicted by forestry is especially inappropriate. Ecosystem values need to be the main priority, with forest harvest being allowed only where and when it will not compromise these values.

Forestry in Alberta has had significant detrimental effects on fish and wildlife, biodiversity, water quality and quantity, and as managed to date contributes to infringement of Indigenous rights. We cannot shift towards sustainable, ecosystem-based forest management without recognizing the full extent of these impacts.

### **Forestry is incompatible with the intent of parks and protected areas**

According to the Provincial Parks Act, “Parks are established, and are to be maintained,

- (a) for the preservation of Alberta’s natural heritage,
- (b) for the conservation and management of flora and fauna,
- (c) for the preservation of specified areas, landscapes and natural features and objects in them that are of geological, cultural, historical, archaeological, anthropological, paleontological, ethnological, ecological or other scientific interest or importance,
- (d) to facilitate their use and enjoyment for outdoor recreation, education and the appreciation and experiencing of Alberta’s natural heritage, and

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<sup>2</sup> “General Guidelines for the Sustainable Management of Forests in Europe, Resolution H1,” Second Ministerial Conference on the Protection of Forests in Europe (MCPFE) (Helsinki, June 16–17, 1993), [https://www.foresteuropa.org/docs/MC/MC\\_helsinki\\_resolutionH1.pdf](https://www.foresteuropa.org/docs/MC/MC_helsinki_resolutionH1.pdf).

(e) to ensure their lasting protection for the benefit of present and future generations.”<sup>3</sup>

The recent re-organizing of Alberta government ministries that puts the *Provincial Parks Act* and the *Willmore Wilderness Park Act* in the same ministry as Forestry and Tourism, rather than the ministry of Environment and Protected Areas, raises concerns that key environmental protections will be removed in Alberta’s parks. AWA is also very concerned by Premier Danielle Smith’s comments on October 21, 2022 that the government may prioritize industry interests, contrary to the *Provincial Parks Act*, by allowing forestry and subsequently increased off-highway vehicle (OHV) access in parks<sup>4</sup>. These comments overlook the huge negative impact that logging has on aesthetic values of the landscape and therefore on most forms of recreation. The AFPA report also suggested that some logging could occur in protected areas to address forest health risks and as a post-event recovery treatment, but that this would be “challenging due to social expectations”. Albertans reasonably expect parks and protected areas to remain protected from industrial disturbances, as vital ecological refuges with compatible low-impact recreation.

Logging in parks and other protected areas must be rejected as a method of increasing timber supply. If evidence-based measures are taken to reduce risks from natural disturbance in protected areas, these should be separate from goals to increase timber supply. Rather than constituting “forest health risks”, insects and fire are natural disturbances that support biodiversity in forest ecosystems to a certain degree. Risk reduction strategies such as prescribed or traditional burning should be considered first, due to their ecological benefits that forest harvesting does not emulate.

### **Forest consultations are too narrow**

In many cases, the government of Alberta has only considered forestry interests in important decisions, rather than consulting the general public. This was evident in the *Forests Act* revision, where Minister Dreeshen noted during Assembly debate that only forestry companies were consulted. The result was a missed opportunity to improve provisions in the *Forests Act* to support forest ecosystems and modernize public participation. The AFPA report is another example; it is inherently biased in that it considers only the interests of the forestry industry, and not the interests of all Albertans. Though the report states that a diversity of perspectives were provided to complete this project, it seems that recreationists, Indigenous rights holders, and other users of the forest were not consulted. This is a major oversight as most Albertans value forests for their recreational and ecosystem values. Alberta forests do not solely support logging, but also support many other users and values. Although the forestry industry supports some jobs, intact forests support the recreation and tourism industries, which are major contributors to Alberta’s economy. Negative economic impacts to recreation and tourism must be considered when assessing the contribution of the forestry industry to Alberta’s economy.

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<sup>3</sup> “Provincial Parks Act,” RSA 2000 cP-35 s3;2006 c27, [https://kings-printer.alberta.ca/1266.cfm?page=P35.cfm&leg\\_type=Acts&isbncln=9780779753840&display=html%29](https://kings-printer.alberta.ca/1266.cfm?page=P35.cfm&leg_type=Acts&isbncln=9780779753840&display=html%29).

<sup>4</sup> *Question Period with Premier Danielle Smith* (Western Standard, 2022), [https://www.youtube.com/watch?v=xhdexl6\\_jrk&t=891s](https://www.youtube.com/watch?v=xhdexl6_jrk&t=891s).

## **Inappropriate increases in forestry allocations**

AWA strongly believes that Alberta's forests are already over-allocated, and new forests should not be added to the merchantable land base, especially without the completion of regional and sub-regional land use plans including thorough cumulative effects assessments. Cumulative effects of forestry, human settlement, other industry, recreation, and climate change on the landscape have had very negative effects on the environment and thus on human health and wellbeing. This has yet to be addressed as the land use planning process is far behind schedule. The AFPA report suggests allocating unallocated Forest Management Units and allowing access to forests in the White Zone (settled areas). Priority needs to be placed on completing the land use planning before committing to new forest allocations, and to assess where forest harvest is appropriate and where it is not. Additionally, forestry encroaching in the White Zone is likely to create conflict with other industries such as agriculture, and it is unclear how these conflicts would be avoided or mitigated. The importance of land use planning has been recognized by the Alberta government in the decision to pause new coal exploration and development in the Eastern Slopes until the completion of subregional plans that would indicate if and where coal mining would be appropriate.

Instead of increasing the merchantable timber land base, other jurisdictions such as British Columbia are removing forests from the merchantable land base, such as for protection of Indigenous rights and vital old growth forests. Adding forestry to the merchantable land base is counterintuitive to Alberta's efforts to protect woodland caribou, which need intact older forests that provide the ecosystem features they rely upon. For example, Alberta's additional logging allocations in Forest Management Unit S22 in 2020 further threatens the West Side of Athabasca River caribou population; critical habitat for this caribou herd was only 16% undisturbed in 2017, well below the minimum 65% undisturbed habitat condition needed for self-sustaining caribou. Rather than allocating more forests for timber extraction, many forests that are more important for other values must be protected and removed from the merchantable land base.

## **Intensive forest management threatens ecological integrity**

Within the theme of growing forests faster, the AFPA report suggests that using "enhanced" forest management practices can reduce harvest rotation lengths. However, current rotation lengths are already a concern for forest ecology: they exist to maximize yield, and they remove the ecologically valuable stands that are older than the rotation age.

As well, it is unclear what these enhanced forest management practices entail. Native trees in Alberta may not be fast-growing enough for the short rotation times that intensive silviculture targets. Using exotic species that may be more suitable for plantation forestry would likely have detrimental effects on the wildlife, biodiversity, and ecosystem structure and function of our forests, as plantations do elsewhere.

Before Alberta adopts further intensive silviculture practices, there should be transparent studies showing biodiversity impacts as well as feasibility with regards to Alberta's climate and forest

productivity. An intensive silviculture approach is being attempted in Nova Scotia, and has been unsuccessful. The relatively low natural productivity of Nova Scotia forests places an ecological limit on wood supply from intensively managed forests, and a similar case would likely be experienced in Alberta. The lack of a landscape-level plan in Nova Scotia also causes major concerns about the continued loss of old forests in this jurisdiction. As noted above, Alberta also lacks completed landscape-level planning to protect valued ecosystem components.

### **Forestry exacerbates risk of natural disturbance and carbon emissions**

The AFPA report claims that enhanced forest management practices will have additional benefits of reducing risk of natural disturbance, and reducing climate change impacts by sequestering more carbon. Climate change and natural disturbance concerns like fire, insects, disease, and windthrow should not be used as a sweeping justification for unsustainable logging; instead, impacts and practices should be properly assessed by looking at scientific research and adjusting forest management accordingly.

Altogether, there is little evidence that forest management reduces risk of natural disturbances or increases carbon sequestration. For the last two decades, Canada's managed forest lands have been logged faster than they have grown back. From 2010 to 2020, Canada's harvested wood emitted 1,400 Mt of CO<sub>2</sub>, while the forest emitted an additional 200 Mt of CO<sub>2</sub>, indicating a shift of forests from a sink of carbon to a source compared to the previous two decades<sup>5</sup>. This shift is a direct result of forest mismanagement. Forest growth has declined, whereas wildfire and tree death and decay have increased. Managed forests have fifty percent lower carbon stocks than unmanaged forests, and forest harvest has long-lasting negative impacts on soil carbon stores<sup>6</sup>.

Research in Alberta's boreal mixedwood forests found "an increased probability of fire in landscapes with increasing amount of recently harvested forest", showing that forest harvesting increases carbon emitted to the atmosphere through increasing wildfire risk<sup>7</sup>. If prevention of natural disturbance risk were a goal of forest harvesting, forest policy would need to change in other ways, e.g., stopping the use of glyphosate to kill deciduous trees, which are less likely to burn than many conifers. Mountain pine beetle, another natural disturbance factor, is better dealt with by targeted detection, selective felling and burning compared to clear cut harvesting according to an assessment of Alberta's mountain pine beetle management<sup>8</sup>.

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<sup>5</sup> Barry Saxifrage, "Canada's Accelerating Forest Carbon Crisis," *Canada's National Observer*, May 17, 2022, <https://www.nationalobserver.com/2022/05/17/analysis/canada-accelerating-forest-carbon-crisis>.

<sup>6</sup> A. Noormets et al., "Effects of Forest Management on Productivity and Carbon Sequestration: A Review and Hypothesis," *Forest Ecology and Management* 355 (November 1, 2015): 124–40, <https://doi.org/10.1016/j.foreco.2015.05.019>.

<sup>7</sup> Meg A. Krawchuk and Steve G. Cumming, "Disturbance History Affects Lightning Fire Initiation in the Mixedwood Boreal Forest: Observations and Simulations," *Forest Ecology and Management* 257, no. 7 (March 22, 2009): 1613–22, <https://doi.org/10.1016/j.foreco.2009.01.019>.

<sup>8</sup> Allan Carroll et al., "Assessing the effectiveness of Alberta's Forest Management Program against the Mountain Pine Beetle" (fRI Research, March 17, 2017).

Additionally, a 2022 report by Nature Canada and the Natural Resources Defense Council found that greenhouse gas emissions from forestry operations in Canada are on par with emissions from oil sands operations<sup>9</sup>. This analysis, conducted using the government's own emissions data, sheds light on how detrimental and misleading it is for the forestry industry to be advertised as carbon neutral or even beneficial towards climate change prevention.

In summary, AWA is concerned that Alberta's current timber-centric forest management regime threatens ecological integrity and fails to properly engage Albertans on important decisions. Though some nominal protections exist for ecosystem values such as water and wildlife, these are often insufficient, and seem mostly to be viewed as an obstacle to harvesting timber. Rather than viewing ecosystem values as subservient to feeding lumber mills, we must understand that the collective wellbeing of Albertans relies on the integrity of forest ecosystems.

AWA urges you not to implement the recommendations from the 2020 AFPA report discussed above, namely logging in parks and protected areas, allocating more unsustainable annual allowable cut, and implementing more intensive forest management practices.

We look forward to your response and to meeting to discuss the topics considered above, and other provincial forestry issues. We want to advise you that this letter will be made public one week from today.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



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<sup>9</sup> Matthew Bramley and Graham Saul, "What Are the Net Greenhouse Gas Emissions from Logging in Canada?" (Nature Canada, Natural Resources Defense Council, October 2022).