

Will British Columbia Save the Inland Temperate Rainforest and its Endangered Southern Mountain Caribou Before It's Too Late?



A Harmony Foundation Report and Publication



Acknowledgments

Any worthwhile endeavor is a collaborative effort involving team members, advisors, writers, reviewers, researchers and knowledgeable people consulted from government, First Nations, universities, local communities and environmental NGOs.

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Foreword

When I began my career as a young biologist in the 1970s, **Deep Snow Mountain Caribou** still roamed the Inland Temperate Rainforest of British Columbia in the thousands. I studied them in their natural habitat, iconic animals well adapted to deep snow, feeding on tree lichens that only grow only in mature forests. Even then, I could see the warning signs. Logging roads were opening mountainsides and valleys, clear cuts were razing old-growth forests and the balance between Caribou, their environment, and people was breaking down.

I spoke out, believing that if people understood what was being lost, they would demand change. **I continue to speak out because the problem has become a crisis.**

Five decades later, those early warnings have been realized in devastating fashion. Of seventeen recognized herds in British Columbia, six are gone. Three herds cling to existence with fewer than ten animals. The remaining herds are under duress. These are not statistics, they reveal the unraveling of a unique way of life, for Caribou and for people whose culture and identity are tied to them and their forests.

The crisis extends beyond the Caribou. The Inland Temperate Rainforest, one of the rarest ecosystems on Earth, is itself imperiled. Its ancient cedar and hemlock forests, salmon rivers, and rich biodiversity are vanishing within a single human lifetime. To stand by as this happens is not only an ecological failure, but also a moral one.

I have seen the cost of delay and indifference, and I have seen what becomes possible when people work together with respect for one another and for nature. We have power!

The vision for **the Great Caribou Rainforest Conservation Area** grew out of my long commitment to Caribou and became possible through the leadership of First Nations whose territories cradle this rainforest. Together Indigenous Nations, scientists, and partners have laid the foundation for real change. The missing ingredient is political will to act decisively and at the scale required to protect biodiversity, conserve high carbon capture old-growth forests, and advance reconciliation.

Yes, BC has acknowledged the global significance of the Inland Temperate Rainforest and the urgency of protecting the Deep Snow Mountain Caribou. They know public support is strong. Yet too often government defaults to minimal steps and further delay.

I will not pretend the road ahead is easy. Bureaucracy moves slowly, industries press their interests hard, and governments often say one thing while permitting the opposite. I have learned

that conservation is not only about ecosystems, but also about persistence, politics, and the courage to keep going when progress falters.

I remain cautiously hopeful. More British Columbians understand what is at stake, young people are demanding a different future, and Indigenous leaders committed to conservation are aligning ecological survival with reconciliation. That leadership deserves support, respect and resources. The jobs versus environment claim presents a false choice. Healthy forests and watersheds are the foundation of sustainable jobs, safe communities, and a resilient environment.

This report reflects both the progress made and the unfinished work that lies ahead. My wish is that it inspires resolve and action. We cannot undo the losses of the past, but we can decide what kind of future we leave to future generations. If we fail, the disappearance of the Inland Temperate Rainforest and the Deep Snow Mountain Caribou will be our legacy. If we succeed, the Great Caribou Rainforest will stand as proof that when faced with the possibility of irreversible loss, British Columbia chose responsibility over denial, and renewal over greed.

For me, this work has never been about nostalgia or saving something wild out there. It is about responsibility, the kind of people we choose to be. **The Caribou, the rainforest and the future itself are not ours to squander. They are a sacred trust we hold for those who come after us.**

Michael Bloomfield

Founder and Executive Director
Harmony Foundation of Canada



1.

Executive Summary

A Vanishing World

British Columbia is home to breathtaking natural beauty. From the Pacific Ocean to rugged mountains, alpine meadows, glacier-fed rivers and lush temperate rainforests, BC is entrusted with some of the world's most stunning wilderness and wildlife.

Destination British Columbia adopted the slogan "Super, Natural British Columbia" to capitalize on this richness of wilderness, wildlife, and water. But decades of weak laws and political neglect have betrayed it, leaving the slogan a hollow marketing phrase while old-growth forests vanish and endangered species are pushed toward extinction.

Nowhere is this clearer than the Inland Temperate Rainforest (ITR), one of only three such ecosystems on Earth and the only one in North America. Over 95% of its primary old-growth forests have been logged. Nearly 200 species are at risk, including the critically endangered Southern Mountain Caribou, now reduced to fewer than 1,500 animals from thousands that once roamed this area. Without immediate protection, they will vanish, along with a unique and irreplaceable ecosystem.

The Great Caribou Rainforest Conservation Area

In 2021, the Williams Lake, Canim Lake, Simpcw, and Xat'sull First Nations, with the Harmony Foundation of Canada, proposed the Great Caribou Rainforest Conservation Area (GCRCA) to British Columbia (BC) and Canada. This Indigenous-led initiative can help BC meet its commitments on climate, biodiversity, reconciliation, and a low-carbon economy. It will protect three of the largest remaining Southern Mountain Caribou herds and high carbon-capture old-growth forests while creating sustainable economic alternatives for local communities. A public opinion survey found participating British Columbians strongly supportive. The missing ingredient has been political will. Despite high praise for the GCRCA, BC has failed to exercise the leadership to move forward with the urgency needed.

Why Conservation in BC is Failing: The Southern Mountain Caribou Example

For decades, the BC government has issued strategies, consultations, and promises to take strong action on conservation while allowing logging, mining, motorized recreation, and roadbuilding to continue encroaching on ecologically important areas. The result has been widespread loss and fragmentation of critical habitat harming native species and giving invasive ones a foothold.

Southern Mountain Caribou illustrate this failure. Their decline, driven by habitat loss and fragmentation, is worsened by relentless industrial activity. New roads open secure habitat to motorized recreation and predators, yet recovery programs sidestep the core issue, relying on wolf culls, maternal penning, and tree planting.

BC also has failed to meet its promise of stand-alone endangered species legislation, while weak, discretionary, and rarely enforced federal protections worsen the problem. Moreover, conservation funding is piecemeal, bureaucratic, and often politicized, compromising results. Too much authority lies with ministers whose mandates prioritize industry over ecosystems. The result, fifty years of failure.

A Clear Path Forward

The way forward is clear, but time is running out. Protecting the GCRCA, its Caribou, and the Inland Temperate Rainforest, demands leadership not hesitation or delay. Indigenous Nations are ready to lead, science is unequivocal, and public support is strong.

Without bold action, the ITR could collapse within a decade, taking with it, the Caribou and the regional economy. What is needed now is for BC to legislate strong protections, empower Indigenous stewardship, and put long-term ecological and cultural values ahead of short-term industrial profits.

To Prevent Irreversible Loss, BC Must:

- Protect critical Mountain Caribou habitat immediately through a moratorium on logging, mining, and other industrial.
- Establish the Great Caribou Rainforest Conservation Area with long-term funding and agreements with First Nations.
- Enact strong species-at-risk laws: pass BC's long-promised provincial legislation.
- End sport hunting of Mountain Caribou immediately.
- Provide dependable, long-term funding for Indigenous-led conservation and respect free, prior, and informed consent.
- Create an independent oversight body to ensure transparency and accountability for land-based conservation outcomes.

BC can either preside over extinction and ecological collapse or lead the world in reconciliation and renewal. The choice is stark, and further delay would be a betrayal of both nature and future generations. It will seal the fate of Caribou, the rainforest, and the people who depend on them.

Introduction

“Beautiful British Columbia” sells an image of endless wilderness and abundant wildlife. The reality is starkly different. Towering old-growth forests, the backbone of that image, are rapidly disappearing, taking with them species from Mountain Caribou to spotted owls. Decades of weak laws and political neglect have hollowed out the province’s most famous slogan, “*Super, Natural British Columbia*”. What remains is marketing spin, while logging and mining steadily diminish the forests, rivers, and wildlife that inspire British Columbians and sustain any hope for a truly sustainable future. Fisheries and vital drinking water also are under threat. It’s long overdue that policy matches that promise, by urgently protecting what’s left of the old-growth, restoring degraded habitats, enforcing environmental laws, enacting strong species at risk legislation and putting long-term stewardship ahead of short-term profit.

Nowhere in BC is the disconnect more apparent than the rapid disappearance of the Inland Temperate Rainforest (ITR), one of only three such ecosystems on Earth. It is among the rarest and most ecologically significant forest types in the world, yet scientists warn it could collapse within 10–15 years without urgent action.

The ITR covers about 40,000 km², with 80% in BC. More than 95% of its primary old-growth already has been logged, leaving fragmented habitat increasingly threatened by industrial development. Large-scale logging not only devastates biodiversity but also weakens the forest’s ability to store water and carbon. Climate change compounds the risk through altered precipitation, rising temperatures, and declining forest health.

The ITR is home for nearly 200 threatened and endangered species, including the Deep Snow Mountain Caribou which are found nowhere else in the world.

Deep Snow Mountain Caribou are unique because they winter in areas of deep snow, moving seasonally between lower and higher elevations for food, calving and shelter. They once roamed these forests in the thousands.

Today, Deep Snow Mountain Caribou hover on the edge of extinction. Fewer than 1,500 remain. For decades, as their numbers plummeted and warnings grew more urgent, the BC government failed to protect their critical habitat and continued to allow hunting.

In 2021, in response to this crisis, the governments of BC and Canada were presented with an opportunity and a challenge. **The Great Caribou Rainforest Conservation Area described in more detail below**, was proposed to both governments by the Williams Lake, Canim Lake Simpcw and Xat'sūll First Nations and Harmony Foundation of Canada.

The opportunity is to save a significant portion of the unique ITR and its rare species while meeting commitments for conserving biodiversity, protecting old-growth forests, addressing climate change,

and advancing reconciliation with First Nations.

The challenge requires replacing outdated forestry, mining, climate, and wildlife policies, and building stronger collaboration among government, First Nations, ENGOs, and stakeholders to develop and implement more environmentally sustainable economic practices.

Note: This unique ecotype is called Southern Mountain Caribou by the BC and federal government. For the sake of clarity, we will use that nomenclature in this paper.

The Purpose of this Paper

This paper has two primary purposes. To review the experience of working to establish **the Great Caribou Rainforest Conservation Area (GCRCA)**, from 2021-25 and to use that experience to shed light on the larger question of why conservation in BC is struggling and what's needed to overcome the inertia of the status quo.

Over the past four years (2021–2025), the GCRCA initiative has revealed both opportunities and obstacles. It also presented a critical test of British Columbia's commitment to conservation. While some progress has been achieved, systemic barriers continue to obstruct effective protection of this unique ecological area and others across the province. This paper identifies the policy, legal, and institutional reforms needed to secure the survival of Southern Mountain Caribou and to advance BC's 30x30 biodiversity and other conservation priorities ⁶.

The Status of the Inland Temperate Rainforest and the Risks it Faces

The Inland Temperate Rainforest is one of the rarest and most ecologically significant forest types in the world. The ITR found in BC is only one of three inland temperate rainforests in the world and the only one in North America. The ITR is approximately 40,000 square kilometers (4 million hectares), with 80% located in BC. In addition to Caribou, the Inland Temperate Rainforest is home to nearly 200 other listed rare and endangered species⁵ many found only within this rare ecosystem.

Scientists have raised concerns that BC's **Inland Temperate Rainforest** ecosystem in British Columbia is at significant risk of collapse within the next **10 to 15 years** if **immediate and effective intervention** is not taken⁴. It is in serious jeopardy because 95% of primary old-growth has been logged⁴. Increasing industrial development and climate change are worsening the risk.

More specifically the risks are:

1. Vulnerable Species: The Inland Temperate Rainforest is home to many rare and endangered species, including Southern Mountain Caribou. The ecosystem is crucial for biodiversity, providing habitat for species including marten and fisher, owls, golden eagles, salmon, and freshwater trout. BC lists nearly 200 animal and plant species within the Inland Temperate Rainforest as threatened or endangered.

2. Habitat Destruction: Logging is one of the main threats to this ecosystem, as it leads to the fragmentation and destruction of habitat, particularly the old-growth forests that are vital for maintaining biodiversity. The removal of these trees also diminishes the carbon storage capacity of this forest.

3. Climate Change: Climate change is another threat to this ecosystem, affecting precipitation patterns, temperature range, and forest health. Old-growth conservation is essential for climate remediation to prevent greater stress on species already dealing with the pressures of habitat loss and fragmentation.

Immediate Intervention Needed: Scientists emphasize the need for urgent action, such as stronger forest protection measures, restoration of damaged areas, and strictly limiting resource extraction. Without these measures, the Inland Temperate Rainforest suffers irreparable ecological damage.

Continuing down the same path endangers both livelihoods and one of Earth's last great wild ecosystems. Yet a way forward is within reach, built on science and Indigenous knowledge. With courage, the BC government can secure both a living forest and a thriving future for the people who depend on it. The question is whether BC will act before it is too late.

Deep Snow Mountain Caribou (DSMC)

2.



Deep Snow Mountain Caribou (DSMC), hereafter referred to as Southern Mountain Caribou, are a unique subspecies of woodland Caribou (*Rangifer tarandus* Caribou) endemic to British Columbia's Inland Temperate Rainforest. Over the last century, populations have declined dramatically, largely due to habitat disruption and loss and other human disturbances. Over the past 50 years, increasing deforestation and the intrusion of mines and forestry roads into Caribou range, have contributed to their accelerating decline. As recently as 25 years ago, there were 17 Southern Mountain Caribou herds in B.C. Since then, six have been extirpated. Of the remaining 11 herds, three have fewer than 10 individuals and only five consist of more than 100 Caribou. Fewer than

1,500 animals remain. In total, Southern Mountain Caribou have experienced a 50% decline over the past few generations ¹⁵.

The Great Caribou Rainforest Conservation Area

In 2021, in response to this deepening crisis, the governments of BC and Canada were presented with an unprecedented opportunity to conserve a significant portion of the Inland Temperate Rainforest (ITR) and its rare and endangered species, while fulfilling commitments on biodiversity protection, old-growth conservation, climate action, and reconciliation with First Nations.

The Great Caribou Rainforest Conservation Area (GCRCA) was proposed as a large-scale, Indigenous-led conservation initiative by the Great Caribou Rainforest Alliance, composed of the Williams Lake, Xat'sull, Simpcw, and Canim Lake First Nations, and the Harmony Foundation of Canada.

The Primary Goals of the GCRCA:

1. Protecting critical Caribou habitat: The GCRCA would safeguard old-growth forests and other habitat essential for Caribou.

2. Integrating Indigenous knowledge and conservation: The project aligns with the commitment of both BC and Canada to reconciliation through Indigenous leadership and knowledge in conservation.

3. Mitigating climate change impacts: The Inland Temperate Rainforest plays a crucial role in carbon sequestration providing high-level carbon capture, making its conservation beneficial for climate change mitigation.

4. Transitioning to sustainable economies: The GCRCA promotes economic alternatives for resource-dependent communities that will ensure long-term ecological, cultural and economic sustainability.

5. Contributing to meeting BC's commitment to protect at least 30% of its biodiversity by 2030.

Three of the five largest remaining Southern Mountain Caribou herds are found within the proposed Great Caribou Rainforest Conservation Area, with the other two nearby.

Along with ecological protection, the GCRCA seeks to safeguard cultural sites and foster environmentally sustainable livelihoods, as current levels of forest removal threaten the future of Caribou and the regional economy.

Decline of Mountain Caribou in British Columbia: A History of Negligence

The BC and federal governments have long known about the Mountain Caribou crisis, its causes and solutions. In fact, in 1978, the lead author of this paper published a thesis entitled **The Status and Ecology of Mountain Caribou and Caribou Habitat in Central British Columbia** (Bloomfield, 1978) ¹⁶.

The thesis well-documented that the loss of habitat is the primary cause of a decline well-underway. In fact, earlier reports of Caribou decline in the area led to the establishment of Wells Gray, Bowron Lakes and Cariboo Mountain Provincial Parks, all of which lie within the Great Caribou Rainforest Conservation Area. Numerous studies since then, including research by the BC government, have confirmed that habitat loss is the principal cause of Mountain Caribou decline in BC and the principal threat to their survival.

Old-growth forests are critical to Caribou survival, providing food security and protection of seasonal migration routes. The substantial destruction and fragmentation of Southern Mountain Caribou habitat have produced scattered islands of habitat, increasing risks from predation and human disturbance. These Caribou depend on large tracts of intact, old-growth Cedar-Hemlock

forests, where deep snowpacks limit competing ungulates such as deer and moose and provide essential winter foraging on arboreal lichens. Industrial logging, mining, and road development have fragmented and removed much of this habitat. Expanding road networks further increase Caribou vulnerability to predators and recreational disturbance. **Little time remains to save these iconic Caribou found nowhere else in the world.**

Moreover, hunting regulations do not prohibit the killing of breeding age males and, inexplicably, the hunting season overlaps with Caribou breeding season. Furthermore, recreational activities such as heli-skiing, ATVs and snowmobiling continue to disturb and disrupt Caribou.

Short-term measures, such as killing predators, supplemental feeding and maternal penning fail to address the primary threat: large-scale habitat destruction.

Replanting forests, while important over the long-term, is not the solution for the immediate crisis. It will take at least 150 years for forests to become the lichen producing old-growth forests, essential habitat for Southern Mountain Caribou.

Without immediate, enforceable habitat protection, Southern Mountain Caribou, unique to this region of the world, will vanish within our lifetimes.

Note: In the Interior Wetbelt, forests are generally considered old-growth if trees are 250 years old or older. It takes at least 150 years to become lichen rich trees essential for wintering Caribou.

The Committee on the Status of Endangered Wildlife in Canada (COSEWIC)

COSEWIC ¹ designated Southern Mountain Caribou as threatened in 2000. In 2014 COSEWIC raised its designation to endangered. BC also lists them at the highest level of risk on its Red List ². Despite government recognition of their critical endangerment, conservation efforts have been insufficient in halting or reversing their decline.

This failure is primarily due to inadequate habitat protection. The COSEWIC Assessment and Status Report on Caribou from 2014 once again documented the decline of Mountain Caribou. Since that

time ongoing habitat fragmentation and loss and increased access have further eroded the status of these Caribou ³.

The federal Species at Risk Act (SARA) currently lists Southern Mountain Caribou as threatened, while COSEWIC has assessed the southern group of Southern Mountain Caribou (which COSEWIC now calls Caribou, Southern Mountain Population) as endangered ⁷. Despite this recognition, logging, mining and other resource extraction have not been sufficiently halted or modified to protect critical habitat.

Minister of Environment Posts Recovery Strategy for Southern Mountain Caribou

The SARA statutory deadline for posting a recovery strategy for a listed endangered species is one year. The requirement for a threatened species is extended to two years. In 2014, the federal Minister of the Environment posted the recovery for endangered Southern Mountain Caribou, more than six years after the SARA deadline. That finally happened after successful litigation by Ecojustice.

Recovery strategies are planning documents that identify what needs to be done to stop or reverse the decline of a species. They should include requirements to develop range specific habitat management plans, and sometimes they do. Unfortunately, critical habitat range plans were not required in the Southern Mountain Caribou Recovery Strategy (2014). It's unlikely there will be another recovery strategy for SMC, leaving the province too much latitude to continue the same flawed approach for management of Caribou and their habitat.

While it's true that BC did *not* complete a formal range plan for several years after 2014, subsequent actions, such as the 2020 agreements with Canada suggest some increasing responsiveness. However, **whether provincial actions will be sufficient to reverse the continued decline**

of Southern Mountain Caribou remains an open and pressing question. Delays in acting have not been helpful. As a result, since the publication of the recovery strategy, Southern Mountain Caribou have continued to decline, indicating that both federal and provincial actions have been insufficient in promoting Southern Mountain Caribou recovery.

In 2018, the federal Minister of the Environment concluded that Southern Mountain Caribou faced imminent threats to their recovery and recommended that the Governor in Council issue an emergency order under s. 80 of SARA ⁸. Regrettably, in 2021, the Governor in Council (Prime Minister and Cabinet) declined to issue an emergency order, citing other measures “have been taken, continue to be taken, and will be taken to contribute towards addressing the imminent threats to the recovery of Southern Mountain Caribou”.

Measures cited include the signing of a Canada-BC conservation agreement for the Southern Mountain Caribou, and BC's commitment to replace an interim moratorium on new resource development for the purposes of protecting Southern Mountain Caribou critical habitat with permanent protection in specified areas ⁹.

The federal government promised to closely monitor the implementation of these measures. However, over the last four years, BC has done little to implement the applicable measures to address the threats faced by Southern Mountain Caribou, and the federal government has not held BC accountable despite evidence of further Caribou decline. The little BC has done has been criticized by many as insufficient and lacking the urgency that the situation requires.

In fact, too many plans and strategies have led to too little action, for reasons including:

1. Limited habitat protection with little change in activities causing large-scale habitat damage and loss.

2. Over emphasis on reducing predator populations widely considered a short-term, desperate measures. According to CBC, December 21, 2023, BC spent \$10M on killing wolves from 2014 to April 2023 ⁵⁸. This was conducted under the Provincial Caribou Recovery Program described below. CHEK News, Victoria, recently reported (June 14, 2025) that the BC government is moving to make the wolf cull a permanent strategy despite the lack of scientific and public support ¹⁰. To many, this is another example of the lack of willingness to implement the requisite large-scale Mountain Caribou habitat protection necessary for their recovery.

3. Inadequate controls on human-caused disturbances, recreational and industrial.

4. Newly designated areas for habitat protection and wildlife management are temporary and do not have legal protection.

5. Engagement with Indigenous groups, stakeholders, and scientists were used likely to inform about government strategies and lacked opportunities for serious involvement in shaping and implementing recovery efforts.

Seven years after the federal Minister's finding that Southern Mountain Caribou face imminent threats to their recovery, BC's response hasn't been fast or comprehensive enough to meet the needs of the Southern Mountain Caribou population and prevent further decline. The more stringent, immediate and expansive habitat protection needed has not been undertaken.

BC's Caribou Recovery Strategy

The strategy's expressed goal is self-sustaining Southern Mountain Caribou herds ¹¹. It recognizes the vital importance of habitat protection. However, it emphasizes predator control and other desperate measures and fails to address, the impact of sport hunting and motorized recreation. It's long past time for BC's Caribou Recovery Strategy to prioritize habitat protection and restoration in practice.

The Purpose and Necessity of the Great Caribou Rainforest Conservation Area and Why it is Achievable

The Great Caribou Rainforest Conservation Area is a cutting-edge conservation initiative aimed at protecting a significant portion of BC's Inland Temperate Rainforest and ensuring the survival of its biodiversity, including several herds of the critically endangered Southern Mountain Caribou.

It is an innovative program because it combines ecological, cultural and economic goals and is an Indigenous-led initiative.

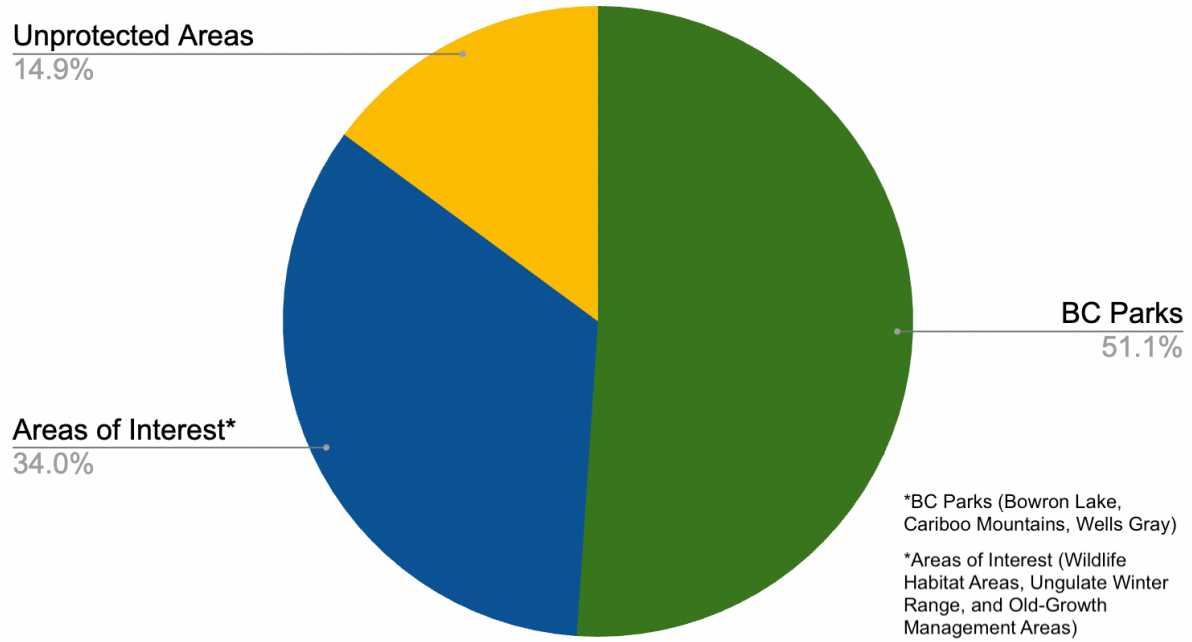


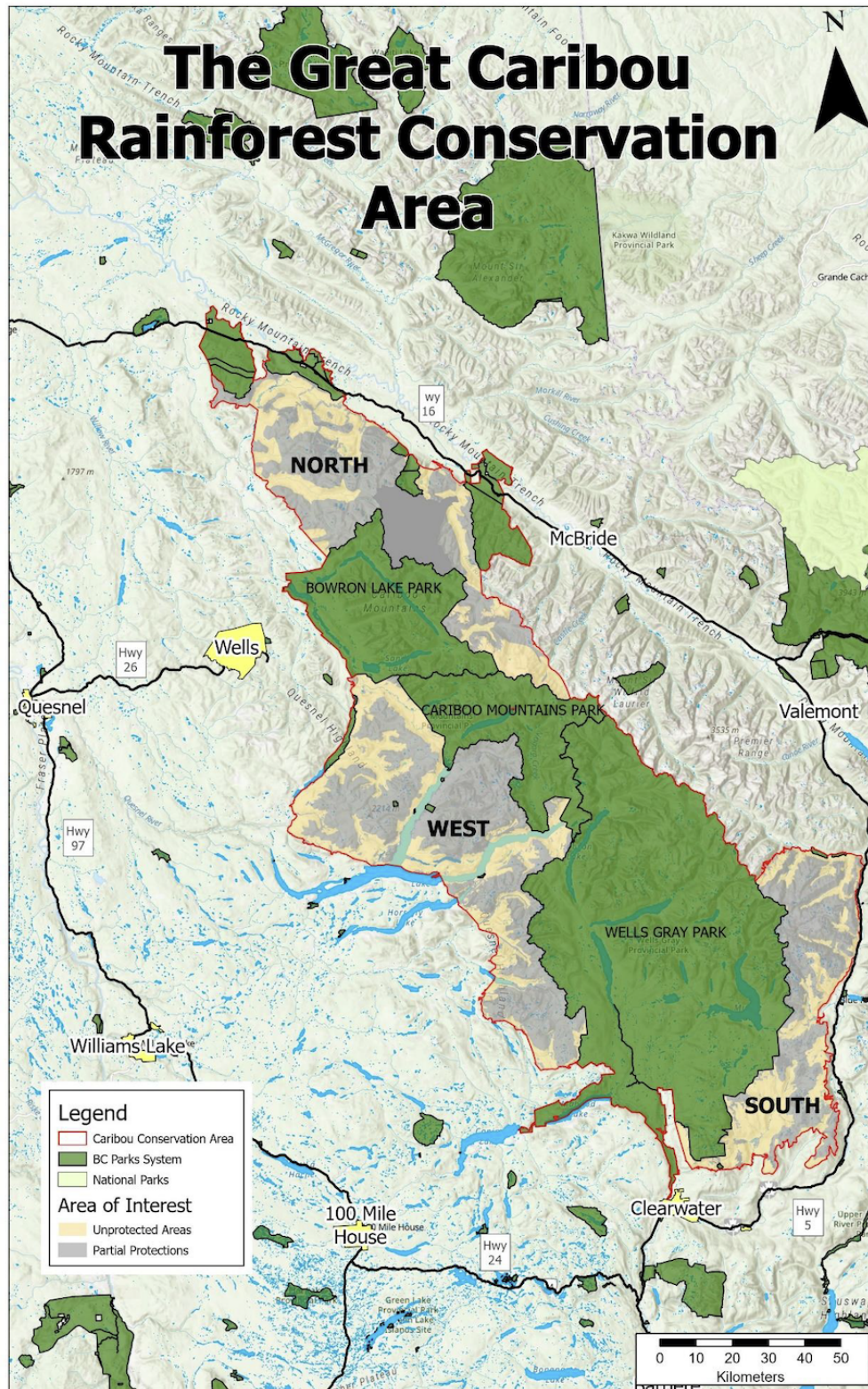
The primary goals of the GCRCA as described in more detail above in the section entitled The Great Caribou Rainforest Conservation Area are:

1. Protect critical Caribou habitat
2. Integrate Indigenous knowledge and conservation
3. Mitigate climate change impacts
4. Transition to a sustainable economy
5. Support BC's progress to protect 30% of its land base for biodiversity by 2030.

The GCRCA is a feasible conservation initiative, as approximately 85% of the proposed area is already under some form of protection. Including the remaining 14.9 % unprotected land and strengthening the protection of existing protected areas would create a world-class conservation area.

Great Caribou Rainforest Conservation Area: Categories of Land





The GCRCA encompasses approximately 10% of BC's Inland Temperate Rainforest. Numerous scientists, including Dr. Tara Martin (UBC), independent researcher Dr Michael Porter, and researchers from the Canadian Forest Service and multiple Environmental Non-Governmental Organizations caution that without urgent intervention the Inland Temperate Rainforest ecosystem is at risk of collapse.

A paper written by Dominick A. Dellasala et al. (2021), warns that the Inland Temperate Rainforest will collapse within 9-18 years due to a combination of logging, climate change, and industrial development if immediate action is not taken⁴. Indigenous Knowledge Holders also have documented the devastation of the Inland Temperate Rainforest^{12 13}. The urgency for establishing the GCRCA and protecting the Inland Temperate Rainforest is clear.

Indigenous Land Stewardship: In addition to the four Nations of the Great Caribou Rainforest Alliance, other Indigenous communities, such as the Nuxalk, Ktunaxa, and Lheidli T'enneh Nations also have called for greater protection of the Inland Temperate Rainforest. Many Indigenous Nations and organizations have advocated for a land-based conservation approach that integrates traditional ecological knowledge with modern science.

Key Accomplishments of the GCRCA During the Period 2021-2025

From the outset, it was clear that the GCRCA posed both a tremendous opportunity and a serious challenge for government. The opportunity was to demonstrate that it was possible to achieve large-scale success if the BC government was serious about meeting its goals and commitments for conserving biodiversity, protecting old-growth forests, addressing climate change, and furthering reconciliation with First Nations through collaborative conservation. It also provided an opportunity to bring rural BC into the province's clean economy strategy.

The challenge was to replace outdated approaches to forestry, mining and wildlife management. That is, to find the political will to ensure resource development is compatible with BC's goals and commitments on conservation, climate, and reconciliation.

Despite ongoing challenges, **the GCRCA achieved success in the following ways:**

- **Alliance Formation:** Four Nations—Canim Lake Band, Williams Lake First Nation, Simpcw First Nation, and Xat'sül First Nation—formed the Great Caribou Rainforest Alliance with Harmony Foundation
- **Government Recognition:** BC has repeatedly said that “the Great Caribou Rainforest is one of its top three conservation priorities under the \$1.1 billion

tripartite Canada-BC Nature Agreement (11/2023). BC also has acknowledged repeatedly the high ecological significance of the Inland Temperate Rainforest within which the Great Caribou Rainforest lies ¹⁴.

- **Community Engagement:** Nations held consultations with Elders, Chiefs, Councils, and community members to align goals for conservation and environmentally sustainable economic development.

- **Capacity Building:** Training priorities and opportunities for future collaboration were identified, for example First Nations guardian programs and co-management with BC Parks.

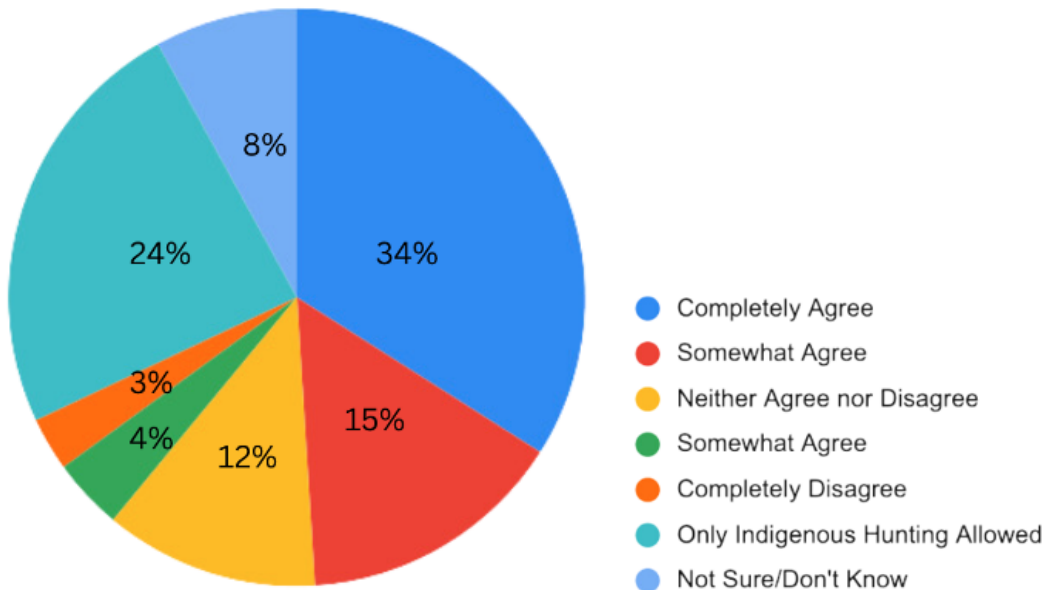
- **Strategic Planning:** Preliminary agreements, governance frameworks, and long-term funding strategies for the GCRCA as an Indigenous Protected and Conserved Area IPCA were developed.

- **Public Support:** A public opinion survey found 80% of participating British Columbians, regardless of location or demographic, support the GCRCA proposal, especially with sustainable economic opportunities included.

Note: The original proposal for the GCRCA and several other relevant documents can be found here ¹⁵.

Public Opinion Survey Supports Caribou

During summer 2024, Harmony Foundation of Canada commissioned a BC-wide public survey. The results showed strong support for action to protect Caribou and their habitat with little variation by age group or location. Respondents were randomly selected.



- 49% of those surveyed agreed that all Caribou hunting in the province should end immediately.
- Informed of new economic opportunities, participant support for Caribou protection increased.

These results were submitted to senior leadership at the Ministry of Water Lands and Resource Stewardship in October 2024 and the Minister's Wildlife Advisory Committee in November 2024 to demonstrate widespread support for Caribou recovery including habitat protection and a full closure of recreational hunting of Caribou.

A Review of BC's Wildlife Conservation Strategies and Programs

A review of government documents describing BC's wildlife conservation strategies, policies, recovery plans, and biodiversity frameworks, leads to the inevitable conclusion that BC's plans and strategies are primarily aspirational and process-oriented and continue to fall short on practical results, certainly for Caribou.

These documents often emphasize planning, intra-departmental and inter-governmental coordination, and engagement activities rather than making changes to policies, programs, legislation, and industrial and recreational activities that have caused the ITR and its rich ecology, including Southern Mountain Caribou to be at risk. Despite the government identifying logging, industrial expansion, and motorized recreation as key threats to Caribou, government strategies frequently prioritize discussion over decisive policy shifts and restrictions on harmful land use and recreational practices.

Government reports can be difficult to assess. They are often written to present the most positive narrative, minimize shortcomings, and include content that reinforces the government's perspective. This is not unusual, but **governments have a duty to keep the public fully and accurately informed.** In reviewing the

following reports and strategies, the authors sought to provide readers with a clear and reasonable overview.

An examination of the following government environmental strategies demonstrated how emphasis on bureaucratic process over practical action has failed to halt, let alone reverse, the decline of Caribou and their habitat.

BC's Caribou Recovery Program Strategy

The expressed purpose of the BC Caribou Recovery Program ¹⁸ is to “develop, implement, and monitor management actions and provincial strategies to ensure we are meeting or exceeding provincial and federal population and habitat objectives.” The goal of the BC Caribou Recovery Program is to see Caribou populations restored to self-sustaining herds.

Analysis of the BC Caribou Recovery Program Strategy (2024) reveals the following breakdown of content focus:

- Caribou Recovery (Direct Conservation Actions): 17.5%
- Inclusive Stewardship (Governance & Engagement): 1.7%

- Durable Provincial Program (Administration & Transparency): 2.8%
- Well-Informed Decisions (Research & Data Management): 2.6%
- Other (Uncategorized/General Content): 75.4%

Again, it can be challenging to evaluate government documents. As best could be determined, only about 17.5% of the document directly addresses Caribou conservation actions. In comparison, most of the content, over 75%, focuses on governance structures, discussions, engagement, and information about the program rather than direct recovery efforts. Considering the severity of the Caribou crisis, it is astonishing that 75% (even 50%) of the recovery strategy is focused on talk, paperwork, and sustaining bureaucracy rather than on-the-ground action.

While there should be considerable concern that most of the program does not consist of direct conservation actions there is a greater concern. It has long been known and acknowledged by the BC government that habitat protection and restoration are essential to achieve the goal of self-sustaining Caribou herds. And yet, BC continues to emphasize inadequate short-term measures such as killing predators, maternal-penning, and supplemental feeding. These measures are less about recovery and more about delaying extinction. Even the BC government concedes that these short-term actions fail to

address the root problem: habitat loss^{24 25 26 27 28}.

The scientific evidence is overwhelming and well documented that habitat loss is the primary cause of the Caribou crisis. What is missing is the political will to do what is most needed, large-scale habitat protection, with specific targets set for the next five and ten years with follow-up reporting to the public.

Planting new trees as a habitat solution is another flawed part of the document. Such plantings will not provide the mature, lichen-producing forests required by Caribou for at least 150 years.

The BC government continues to “kick the can down the road”, a hallmark of its failed strategy for Caribou recovery over the past 50 years¹⁹. BC continues to fail to make habitat protection its top priority.

Boreal Caribou Protection and Recovery Plan Engagement

Another legitimate concern is how the BC government surveys the opinions of stakeholders and the public. Too often there is a bias in the questions asked and in the selection of participants. Although Boreal Caribou are a separate subspecies from Southern Mountain Caribou, it's useful to examine the participants and responses from a 2022 BC survey on Boreal Caribou Protection²⁰.

The BC government surveyed 273 residents, and 21 stakeholders as follows:

1. 53% (144 respondents) to the survey were Hunters/Trappers
2. 22% (61 respondents) were concerned Citizens
3. 13% (34 respondents) were Environmental protection representatives
4. 6% (16 respondents) were resource extraction workers
5. 3% First Nations or Indigenous group(s)
6. 1% Ecotourism Industry
7. 1% Guide Outfitting
8. 2% Prefer not to say

The fact that only 13% of participants were Environmental Protection and only 3% First Nations shows a significant imbalance with at least 61% representing wildlife users. It would be easy to draw erroneous conclusions from this data set. For example, due to the overrepresentation of hunters and trappers who participated in this survey, results reasonably would be expected to show support for wolf killing when British Columbians overwhelmingly oppose it^{10 21}.

Remarkably, while the Boreal Caribou Protection Strategy recognizes that large-scale habitat protection is essential, as it is the case for Southern Mountain Caribou, the process produced few, if any, practical actions. Reporting on a survey is not a genuine strategy to protect Caribou.

2021 Operational Restoration Framework: Woodland Caribou Habitat Restoration in British Columbia

The 2021 Woodland Caribou Habitat Restoration Plan²³ was produced by BC's Ministry of Forests, Lands, Natural Resource Operations and Rural Development, which no longer exists. It is now the responsibility of the Ministry of Water, Land and Resource Stewardship.

The primary goals of the plan are aerial wolf reduction, reducing human disturbance (mainly ATVs and other motorized vehicles), and restoring Caribou habitat as well as stabilizing Caribou populations through maternal penning, predator reduction, and supplemental feeding.

Despite repeated government recognition that habitat protection is the most essential need for self-sustaining Caribou populations, the report does not emphasize habitat protection. Most actions are short-term measures that the BC government itself acknowledges fail to address the core problem of habitat loss^{24 25 26 27 28}.

One of the measures proposed of the 2021 Habitat Restoration plan is replanting trees in critical Caribou habitat. However, as noted above, replanted trees will take at least 150 years to become suitable habitat for Southern Mountain Caribou. These trees will not provide the habitat urgently needed now. Therefore, far greater emphasis must

be placed on protecting existing habitat.
**Nowhere in their Caribou habitat
restoration plan does BC prioritize**

**conserving large areas of old-growth
forest.**

Predator Control is Cruel and Ineffective

Call it a cull, harvest, or population control, these euphemisms mask the cruel and indefensible killing of wolves, cougars, and other predators. Scientific reviews show such programs do not achieve lasting caribou recovery, at best they slow declines briefly, only for predator numbers to rebound after the killing stops. Far worse, they divert attention and resources from the real cause of decline, habitat destruction, and from the path to recovery, protecting old-growth forests and restoring critical habitat through evidence-based, humane conservation ^{67 68}.

Old-Growth Strategy

If current logging practices and policy do not change, it's very likely we can expect BC to resemble this future projection (right map) included in 2020 entitled BC's Old-growth: A Last Stand for Biodiversity. That is, virtually no remaining old-growth forests.

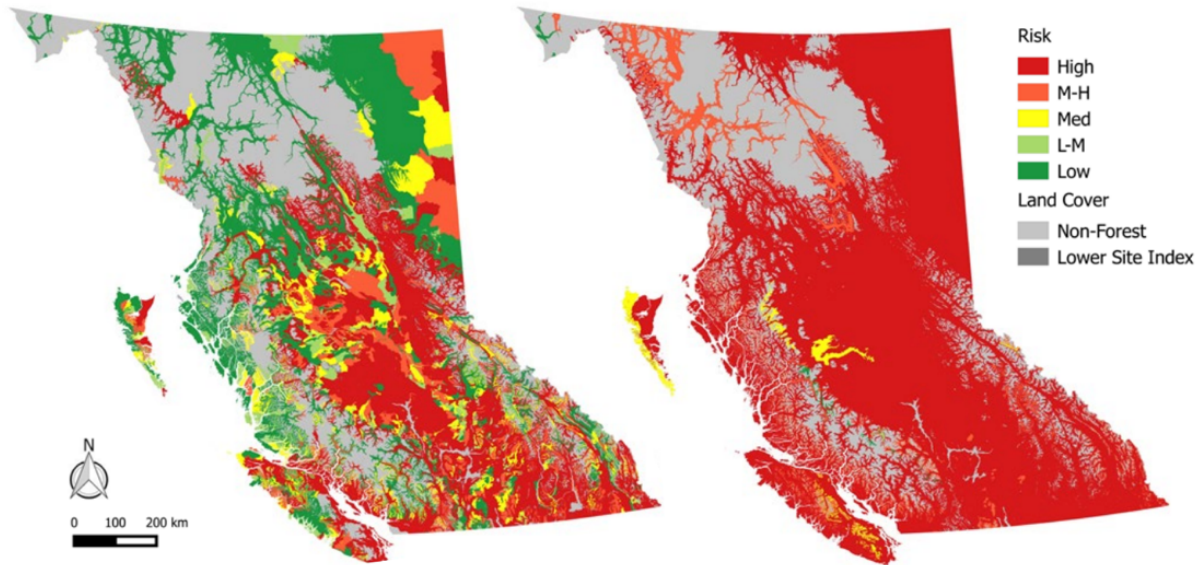


Figure 13. Current risk (duplicated from Figure 7) and projected future risk across BC for BEC variant for forest with a site index >10m, reflecting areas that are spatially set aside and protect old forest (including old forest in protected areas, no-harvest zones and legal old growth management areas. This map does not include Great Bear Rainforest objectives where some areas are intended to remain at low risk.

Source: Price, K., R.F. Holt and D.Daust. 2020. BC's Old-growth Forest: A Last Stand for Biodiversity ⁴⁴.

Part 1 - What is the Old-Growth Strategy and What Did it Propose?

British Columbia's Old-Growth Strategy, initiated in 1992, aimed to transform the management of old-growth forests. The Old-growth Strategy was developed by an interministerial team, with significant industry representation and few conservationists.

The intended purpose expressed in the strategy was to provide a blueprint for action for resource managers and broadly representative stakeholders in conserving old-growth values in an environmentally, socially and economically responsible manner ³⁰.

Our purpose here is not to provide a comprehensive review of the strategy or its accomplishments and shortcomings. However, there is no clear evidence that it has achieved the overall goal of "reservation of significant areas of old-growth forest ecosystems in their natural state," or met its environmental goals for "biological diversity; wildlife and fisheries habitat; water quality and quantity; scientific, genetic and educational values; and cultural, wilderness, spiritual, and aesthetic value. In fact, it is well documented that old-growth forests have been substantially reduced since 1992 ⁴⁴.

Alternatively, the strategy has been far more successful in meeting expressed economic goals of valuing fiber and mineral values, recreation and tourism and the conversion of old-growth forests to new forests.

Part 2 - A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems (Old-growth Strategic Review)

In 2020, the BC government funded a province-wide Old-growth Strategic Review ³⁰ to inform and recommend new provincial policies and strategies regarding old forests.

Accepting the report, a central commitment by BC was the immediate deferral of logging in the most at-risk old-growth areas, identified as 2.6 million hectares by the Old-growth Technical Advisory Panel (OG TAP).

The B.C. government pledged to implement all 14 recommendations from the 2020 report: *A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems*:

1. Prioritize ecosystem health and resilience as an overarching management objective.
2. Declare conservation of ecosystem health and biodiversity of British Columbia's forests as an overarching priority.
3. Adopt a three-zone forest management framework to guide forest planning and decision-making.
4. Implement immediate deferrals of logging in old-growth forests where ecosystems are

at very high and near-term risk of irreversible biodiversity loss.

5. Engage the full involvement of Indigenous leaders and organizations in the development and implementation of forest management strategies

6. Develop and implement a more robust and transparent monitoring and evaluation system for forest management

7. Establish a formalized and transparent process for identifying and managing old-growth forests.

8. Develop a comprehensive and publicly available inventory of old-growth forests

9. Ensure that forest management decisions are based on the best available science and Indigenous knowledge

10. Develop a strategy to transition from high-risk old-growth logging to a more sustainable forest management system.

11. Provide financial support and incentives to assist communities and workers affected by changes in old-growth forest management.

12. Enhance public education and engagement regarding the importance of old-growth forests.

13. Implement a comprehensive and integrated approach to land-use planning that includes old-growth forest conservation.

14. Establish a clear timeline and accountability measures for implementing these recommendations.

Part 3 - From Review to Action (2024): A New Future for Old Forests

From Review to Action (2024) ³¹ is the province's "action plan" response to its failure to implement, as promised, all fourteen recommendations in 2020's A New Future for Old Forests ³⁰. It also describes actions to be taken to remedy these failures. While we laud BC for acknowledging its failures and committing to address them, we've been here before.

The introduction states:

"The review gave us a clear picture of the challenges we face today and why those challenges exist. It emphasized that governments in the past had not fully adopted recommendations for improvements in stewardship. The review underscored the result of this failure as a high risk of loss of biodiversity in many ecosystems, risk to the economic benefits and jobs for communities due to uncertainty and conflict, and widespread lack of public confidence in the system of managing forests."

In seeking to meet the fourteen recommendations from 2020's A New Future for Old Forests, the 2024 From Review to Action document set three primary goals:

1. Expand stable and inclusive land governance: Focusing on collaborative decision-making with First Nations and stakeholders.
2. Stewardship for healthy ecosystems: Prioritizing ecosystem health and biodiversity in forest management.
3. Support the changing system: Facilitating the transition to sustainable forest practices and economies.

Progress to Date From 2020-2024

- **Logging Deferrals:** Approximately 2.44 million hectares of old-growth forests have been **temporarily** deferred from logging, including 1.23 million hectares identified by the Old-growth Technical Advisory Panel (OGTAP). These deferrals are interim measures. While long-term plans are developed in collaboration with First Nations, urgency also seems to be deferred.

- **Conservation Financing:** BC has launched a \$300 million Conservation Financing Mechanism, with \$150 million contributed by the government and a matching commitment from the BC Parks Foundation. This funding is intended to

support conservation initiatives, including the establishment of Indigenous Protected and Conserved Areas (IPCAs).

- **Tripartite Nature Agreement:** In partnership with the federal government and the First Nations Leadership Council, B.C. has secured over \$1 billion through the Tripartite Framework Agreement on Nature Conservation. This agreement aims to protect 30% of B.C.'s land by 2030 and includes a dedicated \$50 million Old-growth Nature Fund.

- **Forest Landscape Planning (FLP):** Thirteen FLP processes are underway, involving collaborative planning with First Nations and stakeholders to manage forest values over defined geographical areas.

- Finally, the government has released a draft *Biodiversity and Ecosystem Health Framework*³² aiming to guide ecosystem-based management, with the final version expected in 2025. This framework aims to integrate biodiversity considerations into all aspects of land-use planning. The question is, how will decisions be made and implemented.

Part 4 - Ongoing Concerns About BC's Old-Growth Strategy

Of course, a strategy only has meaning if, and when, government implements it.

Most of the actions taken to date have been temporary moratorium or deferral. For example, Fairy Creek Watershed on Vancouver Island, Incomappleux Valley South, and Central Walbran Area.

While the temporary deferrals were a step forward, critics argue it's symbolic and insufficient. Main concerns include slow implementation, reliance on poor data, industry bias, under protection of critical ecosystems, and failure to recognize the true ecological and economic value of old-growth forests. Specifically:

- **Incomplete Deferrals:** Only approximately 24% of the most at-risk old-growth forests have been confirmed for deferral ³³ and on an interim basis.
- **Continued Logging:** Logging has continued in some areas recommended for deferral, with at least 112,000 hectares of old-growth logged since 2020 ³⁴.
- **Transparency Issues:** Critics argue that the government has not provided sufficient transparency regarding the locations and status of deferrals and that they are too easily changed.

Part 5 - Challenges from 2024 'From Review to Action'

As described above, From Review to Action (2024) ³¹ is the province's response to its failure to implement the recommendations in 2020's A New Future for Old Forests ³⁰.

Concerns Include:

- **Continued Logging:** Reports indicate that logging has continued in some areas recommended for deferral, with at least 31,800 hectares of candidate deferral forests logged since the OGSF's publication ^{35 36}.
- **Transparency Issues:** Critics argue that the government has not provided sufficient transparency regarding the locations and status of deferrals, making it challenging to assess the effectiveness of protections.
- **Delayed Implementation:** The Biodiversity and Ecosystem Health Framework draft was released in 2023, and finalization was promised by early 2024. It is now late summer 2025 and the delayed Framework is raising concerns about the timely protection of at-risk ecosystems.
- **First Nations Engagement:** While the government emphasizes collaboration with First Nations, some communities have expressed concerns about inadequate consultation and the need for compensation related to deferred logging revenues ^{37 38}.
- **No mention of Caribou!**

It's not easy to determine how many hectares of old-growth forest has been logged since 1992, when BC introduced its Old-Growth Strategy. **No published, province-wide cumulative total** was found of old-growth logged from 1992 to present.

Using the **most credible, province-wide data available for recent years**, the working estimate for **annual old-growth harvest in BC** is:

- **~40,000–45,000 hectares per year** of old-growth clearcut or otherwise logged.
- The province says **about 22% of the annual harvest** comes from old-growth, and under current age-based definition, total old-growth was ~11.1 million ha in 2021 ⁵⁵.
- BC reported **45,700 ha** of old-growth logged province-wide in 2021 ⁵⁶.

That equates to roughly **400–450 km² per year**, an area about the size of the City of Calgary every 12–14 months.

Even when provincial action seems promising, closer scrutiny reveals a concerning pattern. **The Incomappleux Conservancy** proposed by Valhalla Wilderness Society in 2022 lies within the 1.6M hectare proposed GCRCA. The first annual report of the Tripartite Nature Agreement ⁵⁷ discloses that 17,000 ha within the 58,000 ha Incomappleux Conservation Area has been given protection albeit interim. It's a modest but important step and congratulations are due

to those who secured this achievement. However, it falls far short of what is needed.

Because long-term protection is uncertain, and it didn't take long for problems to arise. Satellite analysis in 2023 from Stand.earth Research Group revealed that logging of old-growth candidate deferral areas is more than 50 per cent higher than figures reported by the British Columbia government ^{35 36}.

“These shocking numbers suggest that not only did the province underestimate the loss of at-risk old-growth due to logging, they also hid the fact that in the time between the recommendation for deferrals and the start of that process, several thousand hectares of rare and at-risk old-growth were logged by the industry,” said Tegan Hansen, Senior Forest Campaigner at Stand.earth.

Critics refer to this practice as “talk and log” and only a strong and swift effort to permanently protect the remaining old-growth will overcome the mistrust of the government from past practices.

BC Timber Sales: Out of Control

Contrary to its portrayal as an independent organization, BC Timber Sales is a government program embedded within the Ministry of Forests. Its governance and operations place it at the centre of BC's logging debates. BCTS:

- Plans and approves logging projects with limited external oversight.

- Promotes harvesting in old-growth forests despite conservation reports and recommendations.

- Has faced criticism for closing investigations prematurely and giving insufficient weight to Indigenous and ecological concerns.

- Remains a leading agent of logging in the Inland Temperate Rainforest, including areas of critical habitat for endangered species such as Caribou.

BCTS' mandate is to auction off a portion of BC's annual allowable cut (AAC). These sales are meant to provide a "market price benchmark" for timber and to ensure transparency in how Crown timber is valued. It manages timber sales, builds roads, and prepares areas for logging ⁵⁹.

That BCTS revenues flow directly to the provincial government and its pension plan also has raised concerns about a potential conflict of interest.

Environmental Violations and Old-Growth Logging

Critics argue that this close arrangement blurs the lines between regulation and resource extraction. The same officials who plan and promote cut blocks are also responsible for approving the logging and road permits while producing revenue for the province, an inherent conflict of interest

(*The Northern View*). As a result, many consider BC Timber Sales as a central driver of destructive logging and a major obstacle to effective environmental protections across the province.

A 2019 investigation revealed that BCTS was violating old-growth logging rules in the **Nahmint Valley**, a rare forest ecosystem on Vancouver Island. Investigators recommended halting operations, but logging was allowed to continue unabated, and investigators were instructed to "close the investigation down." The lack of meaningful enforcement has been labeled "indicative of a truly corrupt system" by many conservation groups ⁶⁰.

In a more recent development, a comprehensive 2025 report entitled **Public Forest, Public Trust** authored by Save What's Left accuses BCTS of logging **old-growth forests**, disturbing critical **watersheds**, and disrupting **wildlife corridors**. The report is based on rigorous field verification, satellite imagery, and expert testimony, including from ecologists who argue that BCTS is operating contrary to BC's 2020 old-growth protection policies ⁶¹.

Long-standing tensions have risen to active resistance. In 2014, the **Tseshaht Nation** blockaded logging roads in the Nahmint Valley after BCTS proceeded with cedar logging without their consent ⁶².

Environmental groups such as Wildsight accuse BCTS and the province of empty

promises delaying protective actions while logging proceeds. As one conservation specialist put it: “The policy is talk and log... We are losing some of the best old-growth we have left.” ⁶³.

These confrontations underscore allegations that BCTS routinely overrides Indigenous rights and community stewardship of forests. Where is political oversight?

BCTS’s Role in Logging the ITR: Business as Usual, Failure to Protect

1. Clearing ancient forests under a government mandate

Despite its mandate to promote sustainable forest management, BCTS is actively promoting logging in the ITR and auctioning old-growth forests ⁶⁰.

For example, BCTS contracted Downey Timber to log approximately **150 soccer fields (126 ha)** of low-elevation old-growth in the Bigmouth Creek area, northeast of Revelstoke, a biologically rich, ecologically critical zone ⁶⁴.

2. Caribou habitat under threat

In the Columbia North Caribou herd’s core habitat, BCTS planned to clear-cut **266 hectares of predominantly old-growth forest** a move later deferred due to pressure from Indigenous Nations and conservationists ⁶⁵.

Still, some logging proposals continue to threaten remaining habitat, such as in the Seymour and Nagle Creek valley. In another

case, Wildsight exposed logging and cutting permits in proposed old-growth deferral areas in the ITR near 100 Mile house ⁶⁶.

BC Timber Sales exemplifies the contradictions at the heart of forest management in British Columbia. As a government-run program tasked with generating revenue, it continues to drive the liquidation of ancient forests and the degradation of endangered species habitat, even as policies promise protection. Unless its mandate and operations are fundamentally reformed, BCTS will remain a flashpoint for conflict, undermining both conservation commitments and the credibility of the province’s stewardship of public forests.

Together for Wildlife Strategy

The Together for Wildlife Strategy was written by the Ministry of Forests, Lands, Natural Resource Operations, and Rural Development in 2020, articulating 5 goals and 24 actions to improve wildlife stewardship and habitat conservation in BC ¹⁶. Our assessment is that this strategy is largely aspirational and process oriented.

A few passages from the strategy make that clear.

Together for Wildlife, Vision

“The province is committed to making significant new investments and developing new partnerships to collaboratively deliver

wildlife stewardship. We recognize that we must build on success while continuing to adapt and improve our approaches. We will make these changes in collaboration with Indigenous governments, local governments, and partners, supported by engagement with all British Columbians.”

Together for Wildlife, Introduction

“British Columbia’s biodiversity is globally significant: we are home to the broadest diversity of wildlife and ecosystems of any province or territory in Canada, including some species not found anywhere else on earth.”

Our review of the 2023-2024 list of projects under Together for Wildlife ¹⁷ largely reinforces our conclusion. Projects tended to be small and short-term with limited chance of long-term impact. Caribou are not a priority. No goals or projects directly support recovery of Caribou or their habitat, and only a few, such as collecting wildlife-road collision data and constructing ungulate guards, nominally benefit Caribou. Deer, moose, amphibians, grizzly bears, fish and even bison are more prominently mentioned. The reasons are unclear.

The Incoherence of Sport Hunting

BC continues to permit Mountain Caribou hunting, without scientific justification. Ostensibly, such hunting is allowed based on the flawed strategy of trying to manage individual herds

independent of each other rather than as a population. Some herds may be doing relatively better than others, but none are thriving or free of threat of further decline. Furthermore, hunting is removing breeding bulls, that may be needed for transplant to other herds to give them a chance to survive. Moreover, hunting is reducing genetic diversity. **Continued hunting may serve some other interests but not Caribou.**

Based on BC Caribou data, the areas where hunting is permitted were examined to determine which, if any, Southern Mountain Caribou herds might be put at risk ⁴¹. Within these areas, there are 4 herds, all with less than 160 animals, Tweedsmuir, Telkwa, Takla and Kennedy Siding. Three consist of less than 100 Caribou. According to BC, Tweedsmuir, Telkwa and Takla are in the northern group of Southern Mountain Caribou while Kennedy Siding is in the central group. Neither COSEWIC nor SARA refer to northern/southern groups. The largest Southern Mountain Caribou herds are not large, perhaps in the 500-animal range ⁴¹.

Exercising their Aboriginal rights to hunt on their territories, some limited First Nations’ hunting may occur. It need not be reported. Recognizing the dire circumstances, largely First Nations have stopped hunting Southern Mountain Caribou ¹¹.

Illegal hunting

The extent of unlicensed hunting is unknown, but the NWT territories reported that for the winter of 2020, 143 Caribou were illegally hunted in the no-hunting Bathurst Caribou Management Zone ⁴². It is reasonable to assume BC also suffers some losses due to illegal hunting.

Given the small size and endangered status of BC's Mountain Caribou herds, it is difficult to understand why any hunting is still permitted. Caribou are late maturing, reproduction rates are low, and the 150-250 bulls reportedly killed by hunters each year amount to the loss of at least one herd annually.

Distinguishing males from females is another difficulty since both carry antlers, and hunting is allowed during the breeding season. Moreover, continued hunting of Southern Mountain Caribou runs counter to the intent of Canada's Species at Risk Act, which prohibits hunting of endangered, threatened, or extirpated species ⁴³. Even Limited Entry Hunting undermines Caribou survival, lacking any scientific justification. Is the revenue it generates worth the risk?

In November 2024, the lead author urged the Minister's Wildlife Advisory Committee to recommend ending sport hunting of Caribou in BC. The Committee declined, claiming that hunting regulations are outside its mandate. Alberta closed Caribou hunting permanently in 1982 on the same expert recommendation.

Note: Citation 41 shows all Caribou herds in BC and within which hunting region they are found. Uncertainty about herd size and losses is increased by the difficulty of making sense of BC's use of different names and boundaries for herds, hunting zones, forest management areas etc... as well as the sporadic nature of herd surveys and the difficulty in conducting them.

Tripartite Framework Nature Agreement

The Tripartite Framework Agreement on Nature Conservation (November 2023) ¹⁴ is a partnership between Canada, BC, and the First Nations Leadership Council (FNLC) aimed at enhancing ecosystem health and biodiversity.

The agreement emphasizes Indigenous leadership and collaborative governance to protect critical habitats, restore ecosystems, and recover endangered species.

Priorities of the Agreement:

- Habitat & Ecosystem Conservation:** Protect 30% of B.C.'s land by 2030, focusing on old-growth forests and critical habitat.
- Species at Risk Recovery:** Develop recovery plans for species like Boreal Caribou and Spotted Owl.
- Climate Change Mitigation:** Use conservation for carbon

sequestration and ecosystem resilience.

4. **Indigenous Leadership:** Ensure Indigenous decision-making in conservation.
5. **Collaborative Governance:** Establish a Tripartite Nature Committee to oversee implementation.
6. **Sustainable Financing:** Set up a Conservation Financing Mechanism to fund First Nations-led projects.

Key Commitments:

- Protect up to 13,000 km² of old-growth forests through the Old-growth Nature Fund (\$100M).
- Protect 30% of BC's land for biodiversity by 2030
- Restore 140,000 hectares of habitat by 2024/25 and expand the *Two Billion Trees Program*.
- Co-develop recovery plans for Boreal Caribou and Spotted Owl, with emphasis on strengthening legal protections and reducing regulatory uncertainty.
- Develop a data-sharing framework to integrate Indigenous knowledge into conservation.

Funding of the Tripartite Nature Agreement:

1. Government of Canada

Total Commitment: Up to \$500 million over the life of the agreement.

Key Allocations:

- \$50 million to establish the Old-growth Nature Fund, aimed at protecting 4,000 to 13,000 square kilometers of high-priority old-growth forests.
- \$104 million from the *Two Billion Trees Program*, focusing on restoring species-at-risk habitats, wildfire mitigation, and watershed health.

Other Programs: Funding also supports initiatives like the Nature Smart Climate Solutions Fund, Indigenous Guardians, and Habitat Stewardship Program.

Questions have been raised about some funding being repackaged or directed away from land-based conservation.

2. Government of British Columbia

Total Commitment: Approx. \$500 million through various programs and activities.

Key Allocations:

- \$150 million invested in a Conservation Financing Mechanism.
- BC also counts in-house activities such as land-use planning, the Caribou Recovery Strategy, and the Together for Wildlife Strategy toward conservation funding, even though these are primarily internal rather than on-the-ground measures.

3. First Nations Leadership Council

While not a direct funder, the FNLC plays a crucial role in guiding the allocation of funds, hopefully ensuring that conservation efforts align with Indigenous rights, knowledge, and priorities and the highest principles of stewardship.

4. Matching and Additional Contributions

The agreement anticipates additional funding from philanthropic organizations, non-profits, and private sector partners to bolster conservation efforts.

5. Concerns: While the Tripartite Framework Nature Agreement's commitments are laudable, significant concerns remain.

Key Issues Include:

- **Funding Transparency:** Details are lacking on how the \$1.1 billion will be allocated. How much is new versus reallocated funding, and how much will support government operations rather than land-based conservation.

Questions also have arisen about the complicated process of obtaining funding. An expedited and more transparent process needs to be created to quickly to meet the goals of 30x30. Independent oversight also is needed.

- **Species Protection:** Despite assurances from BC and Canada to the lead author, the critically endangered **Southern Mountain Caribou** were conspicuously absent from the agreement, even though their endangered status has long been recognized.

- **Implementation Challenges:** Many goals are aspirational rather than actionable. Without immediate moratoriums on damaging industrial and recreational activities, achieving 30x30 will be difficult.

● **Indigenous Leadership:** First Nations face challenges balancing conservation responsibilities with other obligations, including land claims. There is concern about how conservation will proceed if Nations are unable or unwilling to take leadership roles in conservation efforts and how they will be supported if they agree to do so.

● **Legitimate questions remain about whether all funds will directly support conservation.** These concerns should be addressed in regular, independent reviews of the Nature Agreement.

- Will funds be diverted to other activities as noted above?
- Is some of the money included in the billion just restating funding already given, such as Nature Smart, *Two Billion Trees Program* etc...
- Is money going to subsidize internal provincial activities?
- Is some funding repackaging of previous commitments?

The agreement's success hinges on innovative, long-term strategies and an unprecedented level of trust and cooperation among all stakeholders. Funding mechanisms and the implementation process must ensure these conditions are met.

The Nature Agreement was established to fund practical projects that help meet BC's commitments to protect 30% of land in BC for biodiversity and species-at-risk, by 2030.

BC's 30x30 Biodiversity Protection to Date: Barely Halfway Done

With only five years remaining, the most optimistic government reports put protected areas at just 19.7% ⁵⁷. Ecojustice independently determined the figure is closer to 15.7% and includes several designations (e.g. Old-growth Management Areas and Wildlife Habitat Areas) that do not meet international or Canadian criteria for protected or "other conserved" areas (OECMs) ⁴⁰. In either case, protection needs to be accelerated.

The Habitat Conservation Trust Foundation (HCTF)

Another funding program, The Habitat Conservation Trust Foundation, was established in 1981. Its mission is to improve habitat conservation. All members of the HCTF board are both directors of the foundation and trustees of the Habitat Conservation Trust. Members of the board are chosen by the BC government, the BC Wildlife Federation, the Guide Outfitters Association of BC, and the BC Trappers Association.

The underrepresentation of other important voices in wildlife conservation is of concern.

Another concern is that the HCTF does not seem to be independent of the BC government. For example, the contact for many of the projects is an employee of the Ministry of Water, Land, and Resource stewardship rather than HCTF.

The HCTF 2023-2024 Project list includes actions such as retiring logging roads and other disturbed areas, creating wildlife corridors, and protecting Caribou cows and their calves by maternal penning ²³. While the total Caribou recovery funding for the HCTF 2023-2024 Projects List totals \$909,424, the projects themselves are generally small, do not focus on Caribou

habitat protection, and certainly not on the large-scale which is essential to ensure self-sustaining Caribou herds.

The HCTF is primarily funded by a conservation surcharge on angling, hunting, trapping, and guide outfitting licenses in British Columbia. It also receives funding from restricted contributions like grants and donations from various levels of government and the public, as well as revenue from commercial activities on conservation lands. Additionally, HCTF benefits from court awards related to environmental infractions and for specific projects, it can fund up to 100% of project costs.

Sources of HCTF funding

- 44% of funding comes from a conservation surcharge on licences sold in BC (freshwater, fishing, hunting, trapping licences, etc.)
- 14% from investment income (unidentified investments).
- 37% from restricted contributions (grants/donations from government and public) and court awards.
- 2% from special permits such as the annual auction for a wild sheep hunt, of which HCTF receives 85% of the proceeds.
- 1% from land management revenue
- 1% from sales of education material and educational contributions
- 1% from general donations

Challenges For Southern Mountain Caribou Conservation and the GCRCA

Despite its merits and broad support, the GCRCA has faced numerous obstacles, which stalled progress and reduced results. Many reflect broader challenges in protecting Southern Mountain Caribou and conservation generally in BC. These include:

1. Government Delays and Bureaucratic Barriers

- The BC governments has been slow to engage in formal conservation agreements with the Nations for the GCRCA, delaying progress on the protected area.
- The delay in finalizing the Canada-BC Tripartite Nature Agreement created uncertainty, leading some stakeholders to postpone conservation efforts.
- Treaty negotiations and the complexities of inter-Nation coordination further slowed decision-making processes.
- BC's promises of government-to-government negotiations and support for First Nations have been slow to materialize.

2. Conflicting Interests and Industrial Pressures

- Logging and mining industries exert inordinate influence on land-use and conservation policies.
- While British Columbians support restricting logging and mining in critical Caribou habitats, the BC government has not implemented adequate restrictions.
- Sierra Club BC conducted a survey in 2019 that found that over 90% of British Columbians support old-growth protection

⁴⁰.

3. Inadequate Conservation Policies and Enforcement

- BC lacks a stand-alone endangered species law, relying instead on a patchwork of sectoral regulations that fall short of providing comprehensive protection for Caribou and their habitat.
- Enforcement of conservation policies is weak, with inadequate funding for ecological monitoring and park management.

4. Fragmented Conservation Efforts

- Conservation efforts in BC are fragmented and poorly coordinated among government agencies, environmental organizations, and Indigenous groups.

- Differing interests and priorities among environmental non-government organizations have at times hindered collaboration on large-scale conservation initiatives.



4.



5.

Recommendations

The following recommendations aim to strengthen wildlife and habitat conservation in British Columbia, with particular emphasis on protecting the Inland Temperate Rainforest, establishing the Great Caribou Rainforest Conservation Area (GCRCA), and ensuring self-sustaining herds of Southern Mountain Caribou. They also address the absence of provincial species-at-risk legislation and the need to ensure the long-term success of Indigenous-led conservation. These recommendations are intended to move solutions forward, and it is hoped the provincial government will act on them with the seriousness they deserve.

1. Key Recommendations for Moving the GCRCA Forward

- Meet BC's commitment of financial, technical, political, and other resources to Nations.
- Provide Nations with resources to prepare for negotiations with BC on boundaries, land use, funding, and stewardship.
- Develop a formal Memorandum of Understanding (MOU) with the Nations, replacing informal discussions with government-to-government negotiations.
- Establish a governance plan for the GCRCA.
- Undertake and support land use and conservation reviews.
- Invest in capacity building for Nations and local communities to participate in the development and management of the conservation area.
- Formally recognize the GCRCA through legislation with long term funding.

2. Recommendations to Ensure Self Sustaining Southern Mountain Caribou Herds

- **Enforce immediate habitat protection:** place a moratorium on logging, mining, and other industrial activity in critical Caribou habitats.
- **Establish a science-based Caribou recovery policy** with measurable outcomes reflecting current science and Indigenous knowledge.
- **Set herd population and habitat recovery targets** for each herd and their critical habitat as part of a comprehensive provincial plan.
- **Provide sufficient long-term funding** for habitat restoration, Indigenous Guardians, and community engagement.
- **Implement regional action plans** for each herd and region, with participation of First Nations and conservation partners.
- **Restrict motorized recreational activities in key Caribou areas** through moratoriums and strict limits.
- **Expand Indigenous led stewardship** with funding, training, and integration of Indigenous knowledge into recovery.
- **Reform funding frameworks** to streamline processes for communities and organizations.
- **Create an independent oversight board** for Caribou recovery.
- **Increase public awareness and advocacy:** engage the public, demonstrate the ecological and economic benefits of conservation, and wind up the ineffective *Wildlife for Tomorrow* strategy.
- **End sport hunting of Mountain Caribou:** ban licensed hunting immediately, enforce against illegal hunting, and address genetic impacts of bull removal.

3. Recommendations for Species at Risk Legislation

The federal Species at Risk Act (SARA) needs to be strengthened to ensure endangered species receive meaningful protection. SARA is a highly discretionary piece of legislation that can only be effective if the federal government uses it to its full potential. Unfortunately, the federal government often misses SARA's statutorily mandated timelines and declines to use SARA's potentially powerful protective tools.

For example, SARA could be strengthened to require automatic emergency measures when species face imminent threats. These measures should be paired with penalties for provinces and industries that fail to comply.

While SARA is a potentially powerful piece of legislation, if used to its full potential, it only applies automatically to federal lands for terrestrial species (see Section 58 (1) of SARA). Individuals and critical habitat receive no protection on provincial lands without a discretionary federal cabinet order (see e.g. sections 61 and 80 of SARA). These orders are extremely rare.

It is essential that the federal Species at Risk Act (SARA) be strengthened to:

- Ensure endangered species receive meaningful protection on all land, not limited to just federal land.
- Require automatic emergency measures when species face imminent threats, with penalties for provinces and industries that fail to comply,

At the same time, the federal government must ensure that SARA's tools are consistently applied, and statutory timelines are met.

It is also imperative that BC enact stand-alone provincial species at risk legislation.

Protection for species at risk in British Columbia is further compromised by the fact that BC does not have provincial species at risk legislation despite several promises to enact such legislation. British Columbians were most recently promised that stand-alone species at risk legislation would be enacted in the NDP's 2017 election platform. Despite that promise, BC remains one of the few provinces without dedicated legislation to protect species at risk on provincial land. This creates a significant gap for Southern Mountain Caribou protection, as their habitat crosses both federal and non-federal land and is largely found on the latter.

4. Recommendations for Ensuring Effectiveness of Indigenous Led Conservation

- Provide long term, dependable funding and resources, avoiding added burdens on Nations.
- Respect free, prior, and informed consent in all agreements.
- Ensure Indigenous led conservation is collaborative.
- Avoid political co-option and tokenism, Indigenous leadership must not be used to reduce provincial accountability or download responsibility.
- Address capacity gaps in ecologically critical areas by ensuring government takes urgent action when needed.
- Support shared stewardship with scientists, NGOs, and citizens alongside Indigenous Nations.
- Recognize that Nations have different capacities to take on large conservation projects and varying interest in doing so.
- Reject the “cleanup” narrative that expects First Nations to repair damage caused by others.
- Maintain environmental protection as a shared responsibility across all sectors of society.
- Implement strong laws and policy reforms to complement Indigenous led conservation.
- Celebrate and build on successful models such as Guardian Watchmen and Indigenous Protected and Conserved Areas.
- Safeguard against delays caused by internal disagreements or unresolved land claims, using strong interim protective measures where needed.

5. Recommendations for Reforming BC Timber Sales (BCTS)

- Remove revenue-generation as a core mandate to eliminate conflict of interest.
- Ensure independent oversight so that regulation is separate from timber sales.
- Prioritize conservation, biodiversity, and Indigenous rights in decision-making.
- End timber auctions in old-growth and critical habitat areas.

6. Recommendations to British Columbia for General Improvement of Conservation

- Establish an independent, science-based oversight body to ensure conservation policy and decisions reflect science, Indigenous knowledge, and public support.
- Set science-based population and habitat recovery targets for species at risk.
- Provide sufficient long-term funding for restoration, Guardians programs, and community engagement.
- Implement immediate habitat protection measures for species at risk.
- Develop and implement biodiversity action plans tailored to each region, with local engagement.
- Restrict industrial activities in key habitats through moratoriums or strict limits.
- Limit motorized recreational activity through moratoriums or strict limits.
- Increase transparency and public engagement by sharing data and improving public awareness of biodiversity.
- Support economic diversification so communities can transition away from reliance on resource extraction.

7. Recommendations to the Environmental Community

- Focus on collaboration in furthering shared environmental goals and minimize competition
- Foster a culture of mutual respect and support, recognizing that collective impact is more important than individual achievement.
- Share knowledge, resources, and strategies to strengthen the capacity and credibility of the entire movement.
- Celebrate each other's successes as steps forward for the common cause.
- Build inclusive networks that reduce cliques and encourage broad participation.

8. Recommendations to Environmental Philanthropies

- Collaborate with partners, value their expertise and experience as central to decision-making, and avoid directing their priorities.
- Respect partners by keeping requirements focused and by avoiding the imposition of unrelated social objectives.
- Strengthen trust-based giving and reduce the administrative burden placed on partners. Allow partners to prepare a single report for all donors, reducing the workload of tailoring multiple reports.
- Provide long-term, predictable funding to allow partners to plan and invest in sustained impact.
- Support capacity building within partner organizations to enhance their effectiveness and resilience.
- Flexibility and responsiveness are as valuable as financial support.

PRIORITIES FOR IMPROVING CONSERVATION IN BC

	Top Three Priorities
1. Advancing the GCRCA	• Formally establish the GCRCA through government-to-government agreements • Create a governance plan with Indigenous Nations • Provide long-term funding and capacity support
2. Caribou Recovery	• Enforce a moratorium on industrial activity in critical Caribou habitat • End logging of old-growth forest habitat • End sport hunting of Mountain Caribou
3. Species at Risk Legislation	• Strengthen SARA with automatic emergency measures and penalties • Enact a BC stand-alone species-at-risk law • Ensure compliance with timelines and strict enforcement
4. Indigenous-Led Conservation	• Provide long-term, dependable funding and resources • Ensure free, prior, and informed consent • Expand Indigenous stewardship models (e.g., Guardian Watchmen, Indigenous Protected and Conserved Areas)
5. Broader Provincial Conservation	• Establish an independent, science-based oversight body to deliver 30x30 biodiversity commitments • Implement immediate habitat protection measures for species at risk • Support economic diversification to reduce reliance on resource extraction

Conclusion

In 2008, a landmark science-based assessment of biodiversity in BC was commissioned by the provincial government. Carried out by the Biodiversity BC partnership, it was the first comprehensive evaluation of BC's biodiversity, assessing ecosystems, species, and ecological processes across the province. The report concluded that while BC is Canada's most biologically diverse province, its biodiversity was under serious threat from industrial development, habitat loss, climate change, and weak governance.

In short, *Taking Nature's Pulse; The Status of Biodiversity in British Columbia* was a wake-up call: it warned that **without strong, immediate reforms, BC's globally significant ecosystems, including the Inland Temperate Rainforest, would face irreversible decline.**

Nearly 20 years later, conservation in British Columbia continues to lag because existing laws are fragmented, weakly enforced, and subordinate to political and industrial priorities. Too much discretion rests with individual ministers whose mandates are primarily economic, leaving conservation dependent on political will rather than legal obligation.

The result is piecemeal measures that fall short of protecting critical ecosystems and endangered species like the Southern Mountain Caribou.

What is required is a shift toward stronger, binding commitments: enacting a stand-alone endangered species law, expanding protected areas, and empowering Indigenous-led stewardship and public participation.

These measures must be supported by long-term funding, independent oversight, and strict limits on industrial and motorized recreational access in critical habitats. Only by replacing discretion with clear legal duties, and short-term profit with long-term stewardship, can British Columbia secure its natural heritage for current and future generations.

The GCRCA is a once-in-a-lifetime opportunity to create a world-class conservation area within the Inland Temperate Rainforest, demonstrating that the future lies in managing our forests for conservation, reconciliation, and an environmentally sustainable economy. Anything less will be a failure.

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APPENDIX 1 - Overview of Provincial Legislation Affecting Conservation in British Columbia With a Focus on Southern Mountain Caribou

Background

A comprehensive review was conducted in 2021 to identify provincial legislation that might enable or impede progress on the proposed Great Caribou Rainforest Conservation Area. The review was carried out by Ecojustice and briefly reviewed in 2025 to confirm its continuing relevance. The full document is available here: Citation 15.

Conservation efforts in BC, including to establish a conservation area in east-central British Columbia must navigate a complex legal framework. Some statutes offer enabling tools for conservation, others entrench industrial access, and several fall in between, containing both opportunities and weaknesses. This briefing note summarizes the main provincial legislation under three categories: Enabling, Constraining, and Mixed/Conditional.

NOTE: Whether relying on this summary or the comprehensive review, the content should not be misconstrued as legal advice. Its interpretation and use are at the sole discretion of the user.

Enabling Legislation

1. Protected Areas of British Columbia Act (1996)

Purpose: Establishes provincial parks, ecological reserves, and conservancies.

Relevance: Provides the strongest statutory protection, with permanent security for habitat.

Weakness: Designations require Cabinet approval, are subject to political priorities, and often face resistance from industry and some local communities.

2. Wildlife Act (RSBC 1996, c. 488)

Purpose: Manages and protects wildlife.

Relevance: Enables Wildlife Management Areas and regulates hunting (e.g., banning sport hunting of Caribou).

Weakness: No mandate for endangered species recovery, limited landscape-scale protection, and implementation is at the discretion of the Minister of Water, Land and Resource Stewardship.

3. Heritage Conservation Act (RSBC 1996, c. 187)

Purpose: Protects sites of cultural and heritage value.

Relevance: Provides opportunities for Indigenous Nations to safeguard culturally significant Caribou habitat, reinforcing Indigenous-led conservation.

Weakness: Narrow scope focused on archaeological and historic sites, decisions at the discretion of the Minister of Forests, weak enforcement, and permits can authorize alteration or destruction.

Constraining Legislation

1. Forest Act (RSBC 1996, c. 157)

Purpose: Governs forest tenures and timber rights.

Relevance: Entrenches industrial forestry access. Altering or suspending tenures in Caribou habitat would face legal and political challenges.

Weakness: Strong legal rights for tenure holders, decisions at the discretion of the Minister of Forests, and high compensation obligations limit flexibility for conservation.

2. Land Act (RSBC 1996, c. 245)

Purpose: Governs disposition of Crown land for leases and permits.

Relevance: Facilitates industrial uses (forestry, mining, energy), creating significant obstacles to land withdrawals for conservation purposes.

Weakness: Broad discretionary power of the Minister of Forests, applied primarily to enable industrial use, with land withdrawals for conservation rarely exercised.

Mixed / Conditional Legislation

1. Forest and Range Practices Act (FRPA, 2002)

Purpose: Regulates forest and range practices.

Relevance: Provides for Wildlife Habitat Areas and Ungulate Winter Ranges, potentially benefiting Caribou.

Weakness: Weak enforcement, ecological objectives subordinate to timber supply, and application at the discretion of the Minister of Forests make protections unreliable.

2. Environmental Assessment Act (2018)

Purpose: Requires review of major projects with ecological impacts.

Relevance: Can slow or modify projects in Caribou range, ensures Indigenous participation.

Weakness: Rarely results in outright project rejection, approvals are discretionary to the Minister of Environment, and conditions often allow continued habitat impacts.

3. Environmental Management Act (2003)

Purpose: Regulates air, land, and water quality.

Relevance: Can indirectly support habitat by controlling pollution and industrial impacts.

Weakness: Not designed as a conservation law, limited habitat application, and enforcement rests with the discretion of the Minister of Environment.

4. Land Act (RSBC 1996, c. 245)

Enabling Aspect: Allows the government to withdraw land or set conditions on use.

Relevance: The Land Act controls over 90% of BC's land, including most Caribou and rainforest habitat. Without reform to prioritize biodiversity and Indigenous rights, conservation efforts will remain undermined.

Weakness: This discretion rests with the Minister of Forests, but is rarely applied for conservation, with industrial allocations consistently prioritized.

5. Critical Gap

Species at Risk Legislation (Proposed, not enacted)

Status: BC remains one of the only provinces without a stand-alone species-at-risk law.

Relevance: A binding statute would compel protection of critical habitat and mandate recovery

actions.

Weakness: The absence of such a statute leaves endangered species protection discretionary, fragmented across other laws, and subordinate to economic and political priorities.

Summary

British Columbia has legislative tools that could support Caribou conservation, but they are fragmented, weakly enforced, and often subordinate to industrial priorities. The **Protected Areas Act** and **Wildlife Act** offer the strongest protective mechanisms, yet both depend on political will and are constrained by discretionary decision-making. The **Forest Act** and **Land Act** entrench industrial access and tenure rights, leaving little flexibility for large-scale habitat protection. The **FRPA**, **Environmental Assessment Act**, and **Environmental Management Act** provide conditional support, but weak enforcement and ministerial discretion undermine their effectiveness. The absence of a stand-alone **Species at Risk Act** is the most significant gap, leaving recovery efforts piecemeal, discretionary, and vulnerable to short-term political and economic pressures.

The most promising pathway forward lies in expanding protected areas and strengthening Indigenous-led conservation, but this will require overcoming entrenched political, legal, and institutional barriers. At present, there is too much discretionary power in the hands of ministers whose responsibilities are primarily economic, leaving them unduly influenced by advocates for development rather than for the environment and future generations.

APPENDIX 2 - Fifty Years of Failure: Will British Columbia Save Mountain Caribou and the Inland Temperate Rainforest Before It's Too Late?

By Michael Bloomfield, ecologist, educator, and caribou biologist | August 1, 2025

In the heart of British Columbia lies a vanishing world, the Inland Temperate Rainforest (ITR), one of the planet's rarest ecosystems and home to some of Canada's most iconic and endangered species. Once home to abundant herds of Deep Snow Mountain Caribou, ancient cedar groves, and pristine rivers, this irreplaceable biome is now on the brink. After five decades of warnings and hollow commitments, British Columbia faces a stark choice: act boldly or preside over the collapse of a natural treasure.

I first raised the alarm in the 1970s as a young biologist decrying the systematic destruction of old-growth forests across the Interior. At the time, Deep Snow Mountain Caribou still roamed the high country in the thousands. Today, fewer than 1,500 remain. These caribou are uniquely adapted to the ITR, surviving long snowy winters by feeding on tree lichens found in mature forests. Yet their critical habitat has been logged, mined, fragmented, and sacrificed for short-term industrial gain. Of 17 known herds in BC, six are already gone. Three have fewer than 10 individuals. Only five exceed 100. These are not statistics, they are harbingers of extinction. We are watching caribou found nowhere else in the world vanish before our eyes.

And it is not just caribou. The ITR, spanning roughly 70,000 km², hosts 196 species at risk and some of the oldest trees on Earth. These forests, high quality carbon storage systems, water reservoirs, and biodiversity sanctuaries. Their loss threatens not only wildlife but our climate, fresh water, and long-term economic stability. Scientists warn that without urgent protection this globally unique rainforest could collapse within 10 to 15 years. The consequences go far beyond BC's borders.

This crisis is not new. The failures stretch back decades. Despite mounting scientific evidence, successive provincial governments have prioritized development over conservation. Alarmingly, BC Timber Sales, a Crown corporation, both auctions timber and approves the permits to cut it, creating an obvious conflict of interest. Even now, as the loss of biodiversity accelerates, the same agency continues to authorize logging in endangered caribou habitat. The provincial government profits, approximately \$250 million a year, from the very policies driving species to extinction. Meanwhile, the federal government, despite invoking the Species at Risk Act (SARA) in 2018, has failed to enforce protection or compel BC to comply with Canada's formal request for protection.

This isn't just bureaucratic neglect. It is a profound betrayal of our responsibilities. Consciously allowing species to go extinct erodes public trust and reveals a failure of environmental

governance. Robbing future generations by taking more than our share is not only short-sighted, it is a moral failure.

In 2021, hope briefly glimmered with the proposal of the **Great Caribou Rainforest Conservation Area (GCRCA)**, a visionary plan developed by four First Nations in collaboration with the Harmony Foundation. This initiative would conserve a vast 1.64M hectare expanse of critical caribou habitat, bolster BC's climate and biodiversity efforts and advance reconciliation through Indigenous stewardship. The scientific community endorsed it. Public support was overwhelming as revealed in a province-wide August 2024 public opinion survey. Even the BC and federal governments repeatedly recognized the area's high ecological significance, with BC describing it as one of the three most important areas requiring protection for BC's conservation efforts to be successful.

And yet, momentum stalled. Bureaucratic inertia, industrial pressure, and political hesitancy have kept the GCRCA from moving forward. Just this spring, over 5,000 hectares of critical habitat across the Columbia North, Groundhog, and Wells Gray South caribou ranges were approved for logging. More recently BC expressed support for a major new mine on the doorstep of Wells Gray Provincial Park, BC's established in 1939 to protect caribou. The Great Caribou Rainforest Conservation Area was anchored on Wells Gray, Bowron Lakes and Cariboo Mountain provincial parks and other protected areas, making it highly feasible. Its economic and cultural features made it an even more unprecedented opportunity to align conservation, reconciliation, and the transition to the low-carbon economy.

In a discouragingly familiar contradiction: government proclaims its environmental leadership while actively undermining the very ecosystems whose importance they claim to recognize.

One path forward is Indigenous-led conservation (ILC), a promising shift rooted in Indigenous rights, knowledge, and stewardship. The growth of Indigenous Guardian programs and Indigenous Protected and Conserved Areas (IPCAs) demonstrates what is possible when Nations are empowered and supported. The GCRCA is itself an example of this new paradigm.

But ILC is not a silver bullet. For it to succeed, it must be pursued with integrity and realism. Not all Nations are positioned to lead large-scale conservation initiatives. Many face pressing challenges in health, education, and housing. It is neither fair nor effective for governments to offload environmental responsibility onto First Nations without providing the sustained resources and authority to succeed. Conservation cloaked in reconciliation rhetoric while downloading risk and work to communities already over-burdened is not reconciliation, it is exploitation.

Nor are Indigenous Nations monolithic, some prioritize conservation, others emphasize development to meet community needs. While that diversity must be respected, it underscores

the danger of relying exclusively on ILC. The survival of endangered species and ecosystems is a shared responsibility. Biodiversity has intrinsic value beyond any single community or interest, whether government or First Nation.

That's why **pluralism in conservation is essential**. Indigenous leadership should be central, but not exclusive. We need scientists, environmental NGOs, citizens, and legal advocates working in concert. Co-management models that blend Indigenous and Western science, grounded in cooperation and mutual respect, offer the most durable and equitable path forward.

And we must be clear about motivations. Some governments support ILC because it looks progressive, not because it works. Assigning conservation roles without transferring real power or resources lets politicians claim credit while avoiding reform. If Indigenous communities succeed, the government will take credit. If they fail, criticism and racism follow. That is unjust and undermines trust and perpetuates systemic inequality.

So, what is required to protect the Inland Temperate Rainforest, recover endangered species, notably mountain caribou and fulfill our responsibilities to future generations?

First, impose an immediate moratorium on all industrial activity in critical caribou habitat.

No more logging, mining, road-building, or motorized backcountry recreation in these fragile areas.

Second, pass a BC Endangered Species Act with real legal teeth.

Conservation cannot depend on voluntary policies or “aspirational” frameworks. It must be enforceable.

Third, fund the GCRCA and other conservation initiatives with long-term commitments.

Support must match responsibility. A handshake and a press release are not enough nor are piecemeal conservation areas that leave wildlife stranded on islands of disconnected habitat.

Fourth, stop recreational caribou hunting.

There is **no scientific justification**. In fact, killing breeding bulls further reduces the already diminishing gene-pool, and hunting during breeding season makes no sense.

Fifth, prohibit snowmobiling, ATVing and heli-skiing in caribou ranges.

These activities, however popular, are incompatible with species recovery.

Sixth, reform BC Timber Sales and decouple conservation from profit.

The same agency cannot both exploit and protect forests. That is ecological madness.

Seventh, implement the federal-provincial tripartite Nature Agreement with urgency and genuine cooperation.

This must not become another bureaucratic tangle that delays and discourages action by doling out modest, short-term grants when what is needed is bold and expansive conservation

Eighth, Finally, treat environmental groups, scientists, and First Nations as essential partners, not adversaries.

Conservation is not charity. It is an investment in life itself and the future of British Columbia

The cost of failure is incalculable. Not just for caribou or these magnificent trees, but for climate resilience, food security, water supply, and our moral standing as stewards of the Earth. The provincial government cannot continue to issue press releases while issuing cutting permits. The federal government cannot plead jurisdictional complexity while species vanish. And British Columbians must not remain silent while our wild heritage is liquidated for pulp and political expedience.

Furthermore, the need is urgent to stop relying on ineffective measures that ignore the root cause of decline: habitat loss. Maternal penning and hand feeding, however well-intentioned and the brutal killing of wolves are band-aids, diversions, heroic acts. They will not save the caribou or the ITR.

Some argue that conservation is too expensive. In truth, the cost of failure to public health, the environment, and the economy is far greater. And in any case, this is a false premise. British Columbia has the money. The Canada–BC Nature Agreement includes \$1.1 billion in funding, yet action remains slow. Meanwhile, BC plans to spend at least \$650 million to host just seven games of the 2026 FIFA World Cup. Are we really prepared to accept that there's no money to protect one of the planet's last great temperate rainforests, an ecosystem in our care?

This is not a question of knowledge. We know what must be done. It is not a question of capacity. We have the science, the tools, and the community will. It is a question of courage, a moral challenge to our generation.

The GCRCA offers a clear, science-based, Indigenous-led solution. It can be the foundation of a bold new chapter in conservation if our leaders find the political will to act.

The Inland Temperate Rainforest is not yet lost. But time is running out. We must not be the generation that let one of Earth's last great forests to disappear.

APPENDIX 3 – Overview of the Great Caribou Rainforest Conservation Area



Canim Lake Band
The Tsq'escenemc
"The People of Broken Rock"

The **Great Caribou Rainforest (GCR) Conservation Area** is a timely opportunity to advance reconciliation through conservation of one of the most unique ecosystems in the world, BC's Inland Temperate Rainforest (ITR). It prioritizes transition of resource-dependent communities to sustainable alternatives.

Williams Lake First Nation (WLFN), Canim Lake Band (CLB), Xat'sull First Nations (XFN) and Simpco First Nation (SFN) have formed the **Great Caribou Rainforest Alliance** with Harmony Foundation to pursue this Indigenous-led initiative in cooperation with BC and Canada. In the words of the Nations' Chiefs, *"this area is highly significant to us, culturally, economically and environmentally and must be well- managed for future generations"*

Indigenous knowledge and leadership are integral to the initiative which aligns well with government commitments on bio-diversity, species-at-risk, old-growth and sustainable forest management, climate change and Indigenous rights. It presents an excellent opportunity for BC and Canada to demonstrate in practical terms their commitment not only to conservation, but also to truth and reconciliation, through alignment of this project with the Declaration on the Rights of Indigenous Peoples.

Establishing the conservation area would protect a significant portion of BC's Inland Temperate Rainforest (ITR), the only one in North America, and one of only three in the world.

- These forests have high capacity for carbon capture, and 10% of the area is classified old-growth.
- Conserving these forests will contribute to meeting Canada's 30% by 2030 commitment.
- This biodiversity rich area sustains hundreds of species at risk, including grizzly bear, wolverine, great horned owls, salmon and 3 of the 5 largest herds of the critically endangered Southern Mountain Caribou.

The Deep-Snow Mountain Caribou of BC's ITR are unique in the world. As recently as 20 years ago there were 17 herds. Today only 11 herds remain, with only five having more than 100 caribou. Fewer than 1,500 caribou survive and logging and other large scale resource extraction create islands of habitat, depriving caribou of food and shelter, disrupting migration and increasing predation.

There are compelling reasons to act quickly before this unique ecosystem is lost. Scientists assess that the unique ecosystem will collapse within nine to 18 years unless further habitat loss and fragmentation are stopped (Land 2021, 10(8), 775; <https://doi.org/10.3390/land10080775>).

The GCR Conservation Area is quite feasible and will succeed because:

- Indigenous knowledge, leadership and values are integral
- It builds upon existing parks and protected areas and is anchored by three provincial parks: Bowron Lake, Cariboo Mountains and Wells Gray.
- It knits together the patchwork of protections to create a world-class Conservation Area of 1.6M hectares.
- The area's diverse ecology can support environmentally sustainable economic activities

Our future depends on sustaining healthy ecosystems for long-lasting benefits for nature and people.

Here is an innovative, practical, and inspiring opportunity to simultaneously make progress on climate, biodiversity, reconciliation and the low carbon economy.

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