



Reference: 257480

August 24, 2020

**VIA EMAIL: [tw.bc.chapter@gmail.com](mailto:tw.bc.chapter@gmail.com)**

Dear BC Chapter of The Wildlife Society:

Thank you for your letter of July 17, 2020, to Honourable Doug Donaldson and Honourable George Heyman, providing your society's position statement on the use of glyphosate-based herbicides in forest management. I have been asked to respond as Deputy Minister of Forests, Lands, Natural Resource Operations and Rural Development.

Your submission is timely, as the Resource Stewardship Division, led by the Resource Practices Branch and supported by Ministry of Environment and Climate Change Strategy staff, is currently reviewing glyphosate use in British Columbia's forests.

The BC Chapter of The Wildlife Society (BCTWS) position statement will be considered in this review which is assessing where and why forest managers are using glyphosate, and how it may be impacting critical values such as forest carbon, First Nations cultural values, wildlife and wildlife habitat values, and wildfire resilience. This review is also intended to document the uncertainties and assumptions related to forestry-related glyphosate use.

Initiatives currently underway that may address some of the concerns in your position statement include the following:

1. Maps have been developed showing the location of all brushing treatments on Crown land in British Columbia since 1991, identifying aerial versus ground-based applications, to provide a tool for analyzing the distribution and intensity of treatments in any given area.
2. A field study was initiated in 2018, to investigate patterns in moose forage quality (foliar nutrition and energy) between glyphosate treated and untreated blocks, and between blocks of different time-since-treatment (1, 3, 6, 12 years post-application, replete with controls). The study was subsequently expanded to quantify the persistence of glyphosate residues in plant tissues along the same gradient of time-since-application. The data are presently being analysed, with preliminary results expected in the coming months.

3. A field review will be undertaken this year in the southwest portion of Prince George District and the northwest corner of Quesnel District to assess the amount and health of deciduous species remaining in treated blocks as well as in surrounding stands and generally across the landscape with a focus on any implications to ecological integrity.
4. The province is focusing on objective-driven silviculture regimes that will clarify and establish priorities for multiple objectives on the land base. For example, buffers prioritized for wildfire breaks may reflect a higher acceptance of deciduous species over conifers as acceptable stocking standards.

However, for this to be effective, significant amounts of deciduous need to be present in strategic locations on the landscape with potential to improve wildfire suppression effectiveness. This is not always the case. For example, a review of the wildfire impacted area in 2017 found that not only had there been negligible amounts of deciduous forest cover within the fire perimeters, but also that there had been very little brushing and even less herbicide use, ranging from 0.3 percent to 3 percent of the area harvested within the wildfire perimeter.

In addition to the above, the Resource Practices Branch is working with the Wildlife and Habitat Branch, and with regional wildlife and habitat staff to enhance understanding and share learnings related to glyphosate-related wildlife habitat impacts and browse species availability. We continue to monitor annual application rates of glyphosate, which have declined significantly to just under 3,000 hectares provincially in 2019.

Again, thank you for providing us with the BCTWS position statement and for the time and effort that went into preparing your document.

Sincerely,



John Allan  
Deputy Minister

pc: Honourable Doug Donaldson, Minister of Forests, Lands, Natural Resource  
Operations and Rural Development  
Honourable George Heyman, Minister of Environment and Climate Change Strategy  
David Muter, A/Assistant Deputy Minister, Resource Stewardship Division  
Fish and Wildlife Branch