



CLIFF #193877

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Rebecca Freedman
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Ministry of Environment
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Dear Rebecca Freedman:

The Coast Operational Issues Forum (OIF) is sponsored by the West and South Coast Regions of the Ministry of Forests, Lands and Natural Resource Operations, and is tasked with improving communications and finding solutions to operational issues affecting the forest sector in Coastal British Columbia. Our members include representatives from various government program areas, First Nations and a number of forest licensees ranging from small to large. We meet regularly to deliberate and make recommendations for improving policy/legislation related to operational forest management.

As co-chairs, we are writing regarding the venting requirements for open burning under the Open Burning Smoke Control Regulation (OBSCR). Forest industry practitioners have observed problems with Environment Canada regional venting forecasts, due in part to the broad geographic extent that the forecasts apply to. At times, local extrapolation of regional forecasts has unnecessarily delayed burning projects to the point that burning objectives could not be efficiently or effectively achieved. In some cases this has forced practitioners to miss the most favourable and reliable conditions for avoiding smoke and human conflict, resulting in emissions and unabated fire hazards that increase risks to human health and property. We offer the following recommendations for improving the regulation of open burning:

1. Improve meteorological resourcing of custom forecasting, and to alleviate resourcing pressures, reduce forecasting requirement if risk is low

If practitioners are going to time their activities to take advantage of the most favourable venting conditions, reliable custom venting forecasts for user-identified map coordinates need to be readily available seven days per week during the Fall burning season. If

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availability of Provincial meteorological services is limited, due to budget shortfalls or other reasons, then these limited resources should be focused on interface zones. Relaxed venting and smoke release conditions in locations where the probability of smoke impacts is low would reduce meteorological resourcing needs. We recommend that where risk of burning affecting air quality is low, that the same level of regulation may not be necessary, ie. when open burning is more than 20 km from populated areas. A more detailed description of when low risk conditions exist can be outlined by Ministry of Environment.

2. Enable professional reliance to reduce harm and manage risk

In the realm of forestry regulation, professional reliance is becoming an accepted approach to forest management. The concept has been used successfully to avoid human harm in areas of forestry practice such as landslide and wildfire avoidance, and inherently requires professionals to work within their scope of practice. Professional foresters would prefer and, if available, seek the support of a qualified professional (such as a meteorologist) to predict venting at the location of an open burn. Nonetheless, if this geographic precision is unavailable, most foresters do have basic meteorological training and can reliably use publicly available forecasts of wind direction and speed, isobar maps, lapse rates, etc. in combination with direct observations of cloud type, smoke columns, etc. to avoid human impact. We recommend that regulations set out desired outcomes (such as avoiding/reducing particulate emissions in populated airsheds) and then rely on qualified professional to utilize the best-available tools and practices to achieve the desired results. Skills and training necessary to be considered a qualified professional would need to be determined.

While we acknowledge the desire for strict regulation and conditions close to settled areas, the majority of the Province is better suited to a professional reliance approach. In the regulation, professional reliance would be enabled by setting out expected outcomes under generally applicable conditions, and by establishing prescriptive conditions such as venting requirements, burn time and duration, seasoning of fuel, coordinated smoke loading limits only where the risk is substantial (i.e. in close proximity to settled areas). As the professional reliance approach proves itself through time, we suggest further expansion of the concept could follow.

If necessary, members are happy to meet with you to explain these recommendations further. If a meeting is not possible, the Coast OIF asks nonetheless that professional reliance concepts be incorporated into the drafting of the OBSCR and policy to facilitate better smoke management outcomes overall and particularly where/when spot forecasting of atmospheric venting may not be consistently available or reliable.

Yours truly,


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cc: David Ranson, Executive Director, Environmental Standards Branch
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