



This is the 1st affidavit
of William Robert Brash in this case
and was made on March ~~7~~¹⁴ 2024

No. S-236214
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

1392752 B.C. LTD.

PETITIONER

AND:

SKEENA SAWMILLS LTD.
SKEENA BIOENERGY LTD. and
ROC HOLDINGS LTD.

RESPONDENTS

AFFIDAVIT

I, William Robert (Bob) Brash, c/o 1133 Melville Street, Suite 2700, Vancouver BC,
Executive Director, AFFIRM THAT:

1. I am the executive director of the Truck Loggers Association ("TLA"), and as such I have personal knowledge of the facts deposed to in this affidavit, except where stated to be based on information and belief, and where so stated I verily believe them to be true.
2. Capitalized terms not otherwise defined in this Affidavit have the same meaning as in the Application Response of TLA.
3. I am a registered professional forester. I was previously a TLA board director for 10 years and I assumed the position of executive director at TLA in 2020.
4. I have extensive experience in the forestry industry in British Columbia, having worked for 17 years in various technical and senior management roles with the Ministry of Forests, followed by 13 years as vice-president and president with the Husby Group of Companies,

followed by eight years as Chief Operating Officer and Chief Executive Officer with Haida Enterprise Corporation.

5. TLA was formed in 1942 to give independent loggers a collective voice in the changes taking place in society and in the forest industry, as well as to share information about newly developing logging machines, methods, and technology.
6. Today, TLA represents over 420 members of the provincial forest community in British Columbia by promoting the viability and sustainability of the forest industry, in policy development, by fostering effective communication, and ensuring a dynamic organization that addresses the evolving needs of its members.
7. TLA speaks routinely to issues on behalf of their members to stakeholders, government officials, and the media.

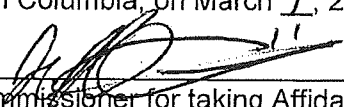
The Bill 13 Contracts

8. The BC forest sector is undergoing significant introductions of new policy and legislation affecting contractors. There are also significant societal expectations for more innovative forest practices in the province along with an expectation for the forest sector to mitigate the risks from wildfires.
9. These transformative changes require substantial and prolonged investment by contractors in the new harvesting equipment and people needed to meet such expectations.
10. In addition, increasing demands for partnerships with First Nations, safety, traceability, carbon consumption, and environmental statistics are further investments which need to be made by the contractor.
11. In order to manage and afford these expectations and changes, long term partnerships and agreements must exist between the licence holder and the logging contractor.
12. The Bill 13 Contracts are intended to protect contractors, who are required to make these significant investments and need a measure of security of tenure to ensure ongoing viability in a very highly capital intensive business.

The Proposed Sale

13. I have reviewed the application of the Receiver to approve the sale of Skeena Sawmills Ltd., Skeena Bioenergy Ltd., and Roc Holdings Ltd. to Cui Family Holdings Ltd (the "Proposed Sale").
14. I understand that the Proposed Sale intends to decouple the Bill 13 Contracts from the Licenses.
15. The Proposed Sale and RVO structure would defeat the entire purpose of the Bill 13 Contracts and the provincial legislation put in effect specifically to protect these Bill 13 contractors. It is therefore of profound interest to the TLA that the Proposed Sale not be approved.

AFFIRMED BEFORE ME at Nanaimo, BC)
British Columbia, on March 7, 2024.)


A Commissioner for taking Affidavits for
British Columbia.)

Jeffrey Watainen
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CDB/saa