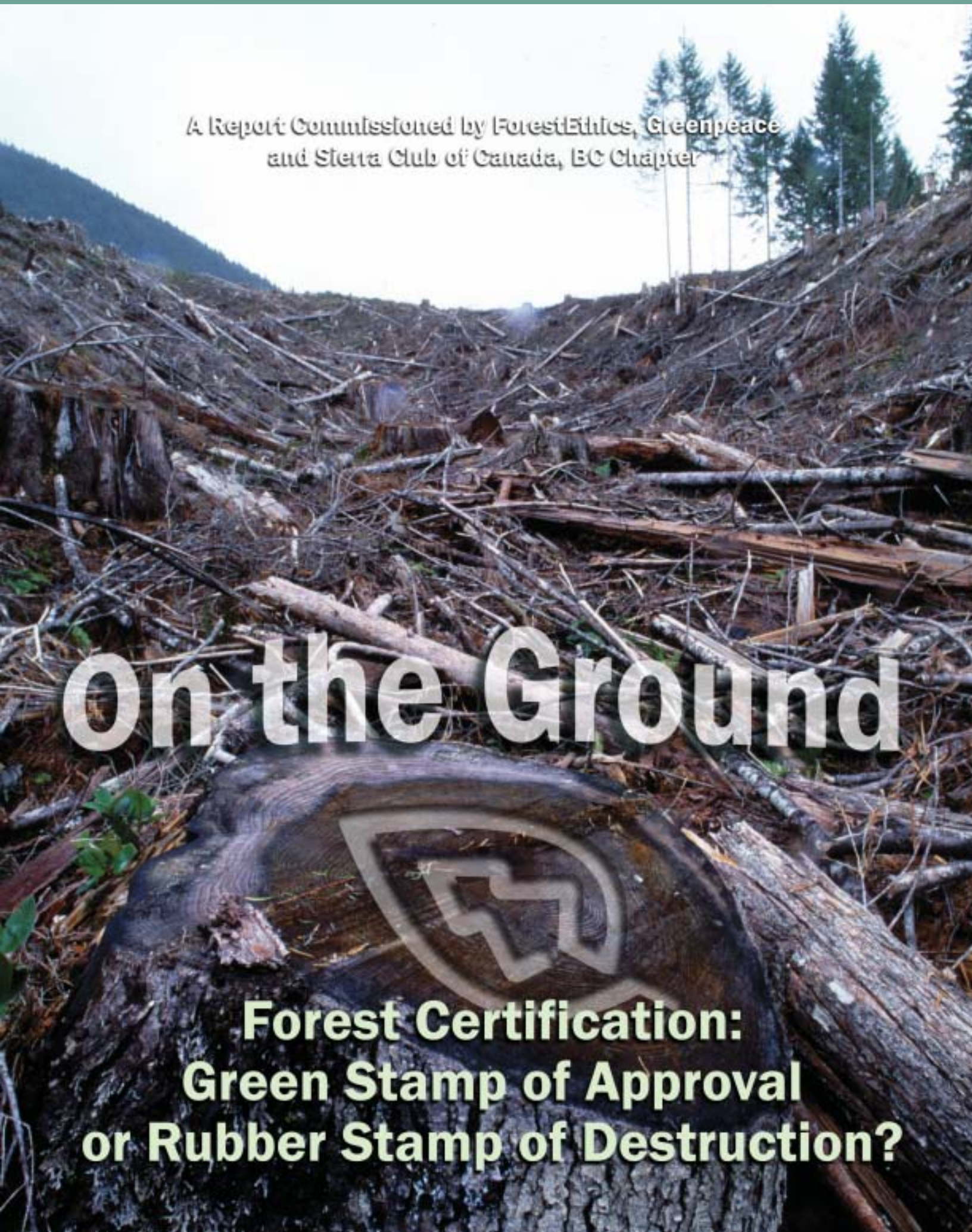

A Report Commissioned by ForestEthics, Greenpeace and Sierra Club of Canada, BC Chapter

On the Ground

Forest Certification: Green Stamp of Approval or Rubber Stamp of Destruction?

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ISBN 0-9698154-8-4

Front Cover photo: SFI-certified logging on Vancouver Island by TimberWest Forest Corporation. Photo by Garth Lenz.
Back Cover Photo: A tree falls in Clayoquot Sound. Logging by Iisaak Forest Resources. Certified by the Forest Stewardship Council. Photo by Cindy Hazenboom.
Author: Ananda Tan
Design and Production: Brad Hornick Communications
Printing: 100% Recycled
This report is available on-line at **www.goodwoodwatch.org**

Executive Summary

If actions truly count more than words, then when logging companies say they are behaving in more socially and environmentally responsible ways there should be solid evidence of that on the ground.

There should be some sign that unsustainable logging practices are a thing of the past, that endangered forests are being conserved, that large clear-cuts are being phased out, and that those communities most seriously effected by ecologically destructive and unsustainable forest industry activities are, at long last, being adequately consulted.

This report shows that at a time when many forest companies claim that their logging operations are independently certified as sustainable, that the gulf between words and actions is vast.

It looks at the three forest certification systems in North America today. Those systems are administered by:

- the Canadian Standards Association;
- the Sustainable Forestry Initiative;
- the Forest Stewardship Council.

Of the three, only the last one represents a viable system that delivers positive results on the ground and in the communities where it matters most. For that reason, FSC is the only forest certification system that is broadly supported by conservation groups.

Throughout this report, case studies of various CSA-approved and SFI-approved logging operations are profiled, including those of Abitibi Consolidated, Weldwood of Canada, International Forest Products, Western Forest Products, TimberWest Forest Corporation, International Paper and Bowater Incorporated. This report presents evidence that under these certification systems, which are widely endorsed by logging companies, environmental damages continue with:

- a proliferation of large clear-cuts;
- continued logging in forests inhabited by endangered species;
- damages to drinking water, fisheries and streamside forests;
- ongoing use of chemical herbicides;
- accelerating losses of natural forests;
- expanding tree farms.

For these and other reasons highlighted in this report, buyers should exercise extreme caution when confronted with company claims that their logging operations are certified and therefor carry an environmental seal of approval. Quite the contrary, if the logging is CSA-approved or SFI-approved, chances are high that it's business as usual, which is a far cry from what progressive forest product buyers expect certification systems to deliver.

While these certification systems generally fail to live up to what most people rightfully expect, the system administered by the Forest Stewardship Council holds promise.

On the Ground concludes with a number of case studies that highlight the much more favorable social and environmental outcomes that follow FSC certifications.

Buyers Beware! Buyers should exercise extreme caution when confronted with company claims that their logging operations are certified and therefore carry an environmental seal of approval.

"Buying FSC products is not only a smart business decision for Home Depot, but one that can help save the environment." - Annette Verschuren, president, Home Depot Canada. World Wildlife Federation press release, April 26, 2002

"We will consider procurement of forest products derived from native and long-settled, forest dependent community operations in ancient forest areas if they are independently certified according to strict ecological criteria." - Random House of Canada. Signed by Anne Collins, vice-president and publisher, Random House Canada, Diane Martin, associate publisher, Knopf Canada, and Maya Mavjee, vice-president and publisher, Doubleday Canada, October 12, 2001.

"If a retailer can get foreign suppliers to improve their practices, everyone will benefit." - Alan Knight, head of social responsibility, Kingfisher (parent company of B&Q and Castorama Do-It-Yourself chains), August 25, 2002.

"The timber used must not be taken from ancient forests or other high conservation value forests, unless the forest area is certified according to the Forest Stewardship Council's principles and criteria or equivalent system." - IKEA Policy on the Wood Used in Its Products, 1999.

"This is more than a simple statement of principle. . . . We are proceeding to seek FSC certification of the operations of Alberta Pacific Forest Industries, Inc. (ALPAC)." - Minoru Makihara, chairman of Mitsubishi Corporation, 70 per cent owner of Alberta's ALPAC pulp mill, November 11, 2002.

After all, FSC certifications enjoy a broader, more diverse array of public support than do CSA and SFI certifications because they:

- protect water courses;
- conserve endangered forests;
- restore and renew lands degraded by industrial logging;
- eschew industrial models of heavy chemical use and large clearcuts;
- make ecosystem protection a priority;
- require the free and informed consent of aboriginal communities.

If forest product purchasers want assurance that the products they buy come from socially and environmentally responsible operations, FSC-certification presents perhaps the best opportunity.

Created 10 years ago at an international gathering of forest company, environmental and human rights groups representatives, the FSC originally placed a great deal of importance on words. A global framework of 10 principles and 56 criteria resulted from that meeting.

More words later followed as other groups with similarly diverse memberships met to develop standards that were applicable to the areas they lived in.

Out of all those words, a simple concept emerged. If companies wished to be FSC-certified, then their operations would be audited by an independent third party who would take a hard look at what they were doing on the ground.

If a company's on-the-ground performance lived up to the FSC's lofty principles, if its actions squared with the right words, certification would be bestowed.

That's why FSC remains the only viable certification system at this time, and why the general public and forest product buyers should reject CSA/SFI certifications that simply rubber-stamp the status quo. By rejecting these schemes and demanding FSC, buyers can help ensure that there is an incentive for more and more companies to clean up their act and gain FSC certification.

Foreword

In the closing decades of the last millenium, unease grew around the world over the manner and rate at which the planet's forests were being logged. Conservation campaigns brought stark images of the denuded Amazonian jungle, British Columbia's coastline, and Siberia's taiga, into people's homes. People everywhere responded by calling for greater protection of endangered forests and the communities that depend on forests for their social and economic well being.

Perhaps the most important campaign outcome was a realization by logging companies that business as usual courted increased public condemnation, which in turn threatened sales. In order to avoid that, some corporations reluctantly acknowledged that some forests should not be logged. A few went further, accepting that forestry methods must improve, and that some form of independent, third party evaluation of those improvements was a prerequisite for continued public support.

This evolution in thinking was no surprise to conservationists who had busily targeted some of the world's largest buyers and sellers of wood products in an effort to convince them to alter their purchasing policies in order to support companies that were more environmentally and socially responsible. These so-called "markets campaigns" continue today.

The upshot of this ongoing work is that many companies have unveiled new procurement policies which eschew purchase of lumber, pulp and paper products originating from endangered forests and instead vow to support those companies and individuals who stand firmly behind well managed, truly sustainable forestry operations.

In the months and years ahead, the same conservation groups that campaigned for forest protection, more responsible forestry practices, and more socially and environmentally progressive purchasing decisions, will carry their work forward in another important arena. They will actively work to establish the link between socially and environmentally responsible forestry and arms-length, truly independent forest certification systems. At this point, the certification system that comes closest to that is administered by the Forest Stewardship Council (FSC).

As such, FSC is the only certification system that enjoys broad support of the conservation community, without which forest companies and forest product buyers will face continued troubles in the marketplace.

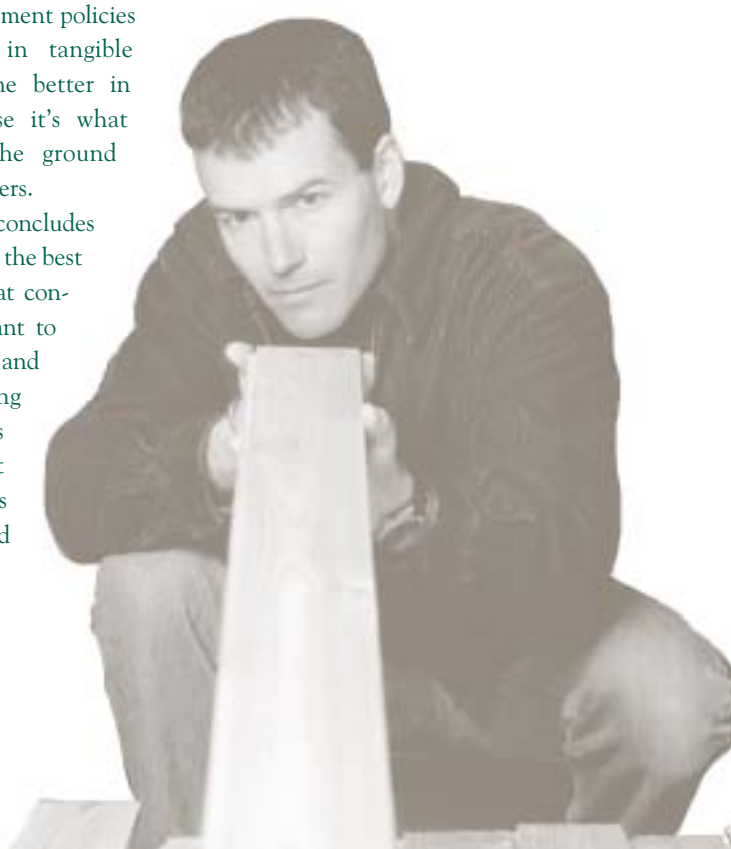
On the Ground demonstrates why conservation groups broadly support FSC, and why they give little if any credence to two other certification systems that ensure further forest and species loss. It was commissioned by Greenpeace Canada, ForestEthics, and the Sierra Club of Canada, B.C. Chapter, with additional support from Good Wood Watch.

The preference for FSC is informed by sound scientific evidence that industrial forestry as practiced in the past and present has unacceptable costs, including the loss of key wildlife species such as grizzly bears, ruined water supplies and rapidly eroding soils. And where there are ecological costs, there are bound to be social and economic costs, costs that are disproportionately borne by indigenous peoples and rural communities the world over.

The organizations commissioning this report believe that when members of the public see what is actually happening on the ground, they too will reach similar conclusions. And it is the general public — the *buying* public — whose views logging corporations must ultimately heed.

As buyers become aware of the differences on the ground between certification systems, it is only natural to expect that they will become more insistent that the values reflected in their procurement policies are reflected in tangible changes for the better in forests. Because it's what happens on the ground that really matters.

This report concludes that at this time the best fit between what conservationists want to see in the forest and what a growing list of retailers want from forest companies is FSC-approved operations.



Cam Brewer, director of the Canadian Eco-Lumber Co-op in Vancouver, inspects FSC-certified cedar paneling. Photo: Barry Calhoun.

Ananda Lee Tan

Introduction

In keeping with this document's title, most of this report is devoted to case studies of various forestry operations that have received certification. But before turning to on-the-ground examples, let's briefly look at the three major certification systems in North America. They are: the Forest Stewardship Council (FSC), the Sustainable Forestry Initiative (SFI) and the Canadian Standards Association (CSA). Each claims to be performance-based. However, there are distinct differences between them. These differences apply to the certification systems' standards, policies, procedures and, most importantly, on-the-ground results.

Forest certification is intended to link environmentally and socially conscious consumers with like-minded producers, retailers, and distributors. Certification involves inspecting forested areas to determine whether they are managed according to agreed-to sets of environmental and social standards. Independent, third party certification bodies, also known as certifiers, verifiers or registrars, are accredited by a certification program. These bodies grant certification (and the use of a label where applicable) to forest management areas that they evaluate and determine to have achieved certain standards. This seal of approval should give consumers confidence that the products they purchase are derived from responsibly managed forests. A good non-forest example of this would be coffee that is certified "shade grown" and/or fairly traded.

Forest workers and conservationists protest TimberWest Forest Corporation's export of raw logs from Vancouver Island's forests. Photo: Brian Clark.

Performance Based Certification

Some forest certification systems involve on-the-ground assessments of a company's forestry practices. Typically, such assessments evaluate the ecological, economic and social aspects of the operation in accordance with the certification standards appropriate to the region. If operations in the forest management area meet or exceed the performance thresholds of the standards, then the operations may be certified. Such certification assessments are deemed to be performance-based, and require measurable targets in order to assess results. Standards specify the minimum performance that must be achieved in a certified forest. There is a lot of debate at present about the credibility of various forest certification systems. Most of the debate centres on how consistently the various systems measure company performances and ensure desired results on the ground.

Performance Requirements and Standards

The requirements contained in any standard are key to determining what the certification system delivers. Internationally, a number of processes have identified the range of issues to be considered in defining responsible forest management, issues which need to be addressed in performance standards. These issues include wildlife habitat protection, representative forest ecosystems, the identification and maintenance of endangered forests, riparian and water quality protection, indigenous peoples' rights and the equitable sharing of benefits with forest dependant workers and communities. What remains to be resolved is a consistent approach to determining whether the above objectives have been met.

Comparing the Results on the Ground

This report examines a number of FSC, CSA and SFI certified forests across North America. It was commissioned by a coalition of environmental organizations, including Greenpeace Canada, ForestEthics, and the Sierra Club of Canada, B.C. Chapter with the support of Good Wood Watch. Currently, these groups actively support FSC. They feel it is important for both market and consumer awareness to explain the differences between certification systems and to show why, at this time, FSC is the only certification system that enjoys the broad support of environmental and social justice groups. The report presents a number of case studies of CSA-certified and SFI-certified logging. The case studies show how unsustainable and ecologically destructive logging practices continue with these certifications. A number of FSC-certified forestry operations are then presented in contrast.

The Three Forest Certification Systems

This report looks at certifications under the Canadian Standards Association's Sustainable Forest Management (CSA-SFM), Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC) certification systems. These are the three main certification systems operating in North America. All claim to be performance-based and to provide:

- independent, third-party auditing;
- chain of custody procedures;
- certified product labeling; and
- multi-stakeholder involvement.

These three certification systems are distinct from a fourth initiative under the International Organization for Standardization, or ISO. Companies claiming to have met the ISO's 14001 standard are not, in fact, required to meet any benchmarks of sustainable or responsible forest management, and therefore are not considered in this report.

The Canadian Standards Association

The Canadian Standard Association's Sustainable Forest Management Standard (CSA-SFM) was initiated by the Canadian Sustainable Forestry Certification Coalition representing 22 forest industry associations. Coalition members include the Forest Products Association of Canada, the Canadian Plywood Association, the Council of Forest Industries and the Canadian Wood Council, as well as most regional forest industry associations. These associations are all funded by logging, sawmill, pulp and paper, and other forest products companies for the purpose of maintaining and enhancing their business interests. The coalition was founded in 1993 with the goal of promoting sustainable forest management standards in order to "continually strive toward sustainable forest management, secure a sustainable supply of forest products, and ensure support for our practices at home and abroad."

SFI-certified logging by International Forest Products in BC's Great Bear Rainforest near Draney Inlet, 2002. Photo: Ian McAllister.

The CSA SFM Standard was developed by the CSA's Technical Committee on Sustainable Forest Management and was adopted by the Standards Council of Canada in 1996. The appointed technical committee consists primarily of forest industry repre-

Funding for FSC, CSA and SFI

Each certification system has notable structural differences and each receives funding from different sources. The FSC, an international, non-governmental and multi-stakeholder governed organization, receives 85 per cent of its funding from independent, philanthropic foundations, with substantial "in-kind" contributions from large conservation groups such as the World Wildlife Fund.

By contrast, both the SFI and the CSA are largely industry driven and funded.

Launched by the American Forest & Paper Association (AF&PA), a coalition of forestry industry associations, SFI operates in the US and Canada. SFI receives 82% of its funding from AF&PA members, with the rest of its funding derived from US federal and state agencies, independent logging associations and other industry sources. The CSA-SFM, a non-profit organization, affiliated with the Standards Council of Canada, was initiated and continues to be funded by the Canadian Sustainable Forestry Certification Coalition, a collective of forest industry associations. The CSA SFM standards are currently only applied to forest management areas within Canada.

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Standards Development: CSA, SFI and FSC

CSA: The CSA standard was designed by a technical committee made up of a range of interests, including academics, government ministries and industry. Most Canadian conservation groups and First Nations have declined to participate as they feel the CSA's standards development is dominated by industry and does not provide a level playing field for participation. CSA standards do not set minimum performance requirements. Applicant forest companies are responsible for this themselves, determining specific performance targets and thresholds for defined forest areas or DFAs. This DFA-specific standards setting process is required to have an affiliated "public advisory group", representing a cross-section of local interest groups. This group then reviews the proposed standards. The group's recommendations are in the form of advice only. They are not mandatory.

SFI: SFI's standards were originally developed by the American Forest & Paper Association. Following widespread criticism of industry bias, the AFPA transferred the governance of the SFI program to a multi-stakeholder Sustainable Forestry Board (SFB) that today consists of five conservation seats, five AF&PA industry seats, and five seats of "other stakeholders". This third set of "other stakeholder" seats is currently held by forestry interests with ties to AF&PA, such as logging contractors, forestry consultants and state forestry officials. The AF&PA appoints all board members. The board is registered as a non-profit organization and is responsible for the management of SFI standards, verification procedures and program compliance.

FSC: The FSC system requires that its International Principles and Criteria be further refined through national and regional processes. The standards set in these processes generally require balanced representation from each chamber (economic, environmental, social and, in Canada, aboriginal) to agree by consensus on the regionally appropriate performance thresholds of the standards, which must meet the final approval of the International Board. Where differences arise between chambers, at regional, national or international levels, the standards approval process requires a 75 per cent vote in favour of the proposed change, with no one chamber completely opposing it. This decision-making structure ensures that no one sector dominates the process. Where regional or national standards do not exist, accredited third party certifiers are required to provide checklists based on FSC's Principles and Criteria. At present there are some concerns about consistency between certifiers, and the ability of individual certifiers to be independent of forest companies to which they may provide other services.

sentatives and government officials, but also includes representatives with the IWA-Canada, the Canadian Wildlife Federation and the Ontario Federation of Anglers and Hunters among others.

In earlier incarnations, the committee had representatives from the Sierra Club of Canada, the Alberta Wilderness Association and the National Aboriginal Forestry Association. But these people left the committee because they did not believe the process would result in a credible set of certification standards. The CSA SFM Standards use the Canadian Council of Forest Ministers' (CCFM) framework of six criteria, 22 elements and 83 indicators. (For more detail on standards development in each of the certification systems discussed in this report, see Standards Development: CSA, SFI and FSC.). Applicant forest companies use these standards to set performance thresholds specific to those defined forest areas that they want certified. Following a successful third-party audit, the defined forest area is registered as CSA-certified.

The CSA SFM system has revised some of its policies and procedures over the years in order to try to attain the level of acceptance enjoyed by the FSC. For example, the CSA launched an optional chain of custody and product marketing (including labeling) program in 2001. In addition, the CSA made the following modifications to its SFM standards and program in 2002:

- additional elements that address protected areas and sites of special significance;

- revisions to public participation processes; and
- inclusion of private woodlot operators for certification.

The Sustainable Forestry Initiative

The Sustainable Forest Initiative (SFI) was launched by the American Forest & Paper Association (AF&PA) in 1994. The AF&PA is the largest forest-industry trade association in the United States, representing 90 per cent of U.S. industrial forestland. The SFI program was developed in response to public concerns about the U.S. forest product industry's environmental performance. The SFI's stated goals are to improve forestry practice among AF&PA members and to promote sustainable forest management among private forest owners. While participation in the SFI is a condition of continued membership in AF&PA, the SFI also has a licensing program for non-AF&PA members that wish to participate, including state lands in the United States and licensees of public lands in Canada.

The SFI Standard uses 6 principles, 11 objectives, 35 performance measures, and 123 core indicators to provide a framework for assessing forest management toward certification. But one prominent aboriginal association in Canada takes a somewhat dim view that this certification system is anywhere near rigorous enough to meet the concerns of its members (see *Forest Certifications and The National Aboriginal Forestry Association*).

Companies and licensees are required to self-report their progress annually in implementing the SFI standards. AF&PA members can choose to be SFI certified either through doing assessments of their own operations or having the assessment conducted by another party. Applicant companies and AF&PA members can develop indicators specific to their own management areas and, when necessary, replace them with indicators that more appropriately provide evidence of conformance with the performance measures.

Forest Certifications and The National Aboriginal Forestry Association

In Canada, more than 80 per cent of aboriginal communities are located in forested areas. As such, it is hard to envision any commercial logging activity that would not impact on aboriginal rights and interests.

The National Aboriginal Forestry Association (NAFA) works closely with governments, unions, forest industry associations and others in an effort to improve conditions for building the capacity of aboriginal communities to participate in all aspects of forest management.

The association has taken the position that certain certification systems do not adequately meet the needs of aboriginal communities.

In 2002, the association withdrew from participation in the Canadian Standards Association's technical committee because the committee was not prepared to add further language to its criteria that would ensure more stringent evaluation of how certifications were addressing aboriginal concerns.

Similarly, the Association has written to the board of the Sustainable Forestry Initiative raising "serious misgivings" about operations that are SFI-certified, primarily because of that certification system's lack of mandated consultation with Aboriginal communities.

"This issue is particularly disconcerting to us at this time because of a recent announcement indicating that 16-million hectares [40 million acres] of Canadian forested land will receive SFI certification in the next few years," NAFA said in a letter to the board.

The letter went on to say that aboriginal communities whose interests were potentially harmed by proposed logging activities in defined areas of forest "must be given an opportunity to participate in the public consultation process and input their special knowledge to the process of setting values, criteria, indicators and objectives."

NAFA takes a brighter view of the Forest Stewardship Council's certification system, however. It notes that the FSC "has an explicit principle that recognizes indigenous peoples' rights."

(To understand why NAFA has a more favourable view of the FSC than CSA and SFI certification systems, please see: FSC Thresholds of First Nations' Cooperation & Consent in British Columbia.)

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Similar to CSA, following public critique and comparative studies that questioned SFI's credibility, the SFI changed some of its structure, policies, and standards. In 2000 the AF&PA transferred the governance of the SFI program to a multi-stakeholder Sustainable Forestry Board (SFB) that consists of five conservation seats, five industry seats, and five seats for other stakeholders (this third set is currently filled by forestry interests with ties to the AF&PA). However, all members of this board continue to be appointed by the AF&PA. The board is registered as a separate non-profit organization and is responsible for the management of the SFI standard, verification procedures and program compliance. Other changes that SFI instituted in 2001 include:

1) increasing the number of indicators in the SFI Standard, such as requirements for chemical use minimization, requirements of plans for stand level retention, requirements for the identification and protection of non-forested wetlands and requirements for minimizing road building activity;
2) an introductory statement requiring legal compliance with all US federal and state laws;
3) an introductory statement of commitment to protecting special sites and forests with exceptional conservation value; and
4) procedural changes including: required public summaries; field assessments as part of the conformance audits; periodic surveillance audits for program participants who wish to use the SFI product label and a formalized appeals process.

The Forest Stewardship Council

The Forest Stewardship Council (FSC) is an international, non-profit organization whose goal is to support the environmentally appropriate, socially beneficial and economically viable management of the world's remaining forests. The FSC was created in 1993 by an international gathering of forest companies, environmental groups and human rights organizations in

SFI-certified logging by TimberWest Forest Corporation on Vancouver Island. Photo: Garth Lenz.

order to design a global framework of performance standards for responsible forest management. This framework has come to be known as FSC's Principles and Criteria (FSC P&C). FSC implements these by:

- supporting the development of national and/or regional forest management standards based on these principles and criteria;
- accrediting independent, third party certifiers who audit forest management for compliance; and
- granting FSC certification and the FSC logo to forest operations that meet this standard.

FSC International is governed by a board of nine elected representatives drawn from FSC's international membership. In order to maintain balanced governance and ensure equal participation for different interests, the board consists of three representatives from an economic chamber (forest industry and associates), three from an environmental chamber (ENGOs and individual activists) and three from a social chamber (labour groups, indigenous peoples and forest dependant communities). Balanced representation is also provided for FSC members to ensure that the interests and concerns of communities and organizations in both wealthy and less privileged lands are provided equal weighting.

National and regional initiatives of FSC are encouraged to establish similarly balanced governance, providing equal opportunity for representation for all local stakeholders. In Canada, the FSC National Initiative has created a fourth chamber for the equal participation of First Nations. FSC Regional Standards are typically developed through such balanced chamber participation and consensus based decision-making. The regional initiatives are responsible for determining the regionally appropriate performance thresholds and targets to be embodied in the FSC standards. The regional standards have to meet the final approval of the FSC International Board in order to be implemented.

Performance Criteria

Used to Measure the Certified Operations

The following questions get to the heart of what matters most to conservation groups when it comes to environmentally and socially acceptable forestry. If a forest certification system hopes to meet with broad support from the conservation community and from the growing list of retailers with which conservationists are working, it must adequately address these questions:

- **Protection of Endangered Species Habitat:** Are certified forest management areas providing adequate protection for rare, threatened or endangered species habitat?
- **Protection of Riparian Forests and Water Bodies:** Are certified forest management areas providing adequate protection for riparian forests and water bodies?
- **Chemical Pesticide Use:** Does certified forest management limit or restrict the use of chemical pesticides, herbicides, and other toxins?
- **Protection of Endangered Forests:** Do certified forest management practices identify and protect endangered forests? (For more information on how forests are defined as endangered visit the website: www.forestethics.org.)
- **Responsible Harvesting Practices and Maintaining Natural Forests:** Are certified forest management areas maintaining and restoring natural forest conditions, while limiting the conversion of natural forests?
- **Accommodation of Indigenous Peoples' Interests:** Do forest certifications provide for meaningful accommodation of First Nations' interests?

Summary of Findings

The SFI and CSA certified management areas examined in this report did not measure up to this list of ecological and social criteria. While recognizing that these certification systems represent industry initiatives intended to facilitate the gradual improvement of commercial forestry practices, it is apparent that neither SFI nor CSA are sufficiently improving forestry practices where they matter most – on the ground.

Not only did the CSA and SFI case studies fall considerably short in addressing the specific criteria they were measured against, most of them also fared poorly in one or more of the other criteria used in this report.

Specifically, this report finds that CSA-certified and SFI-certified forestry operations:

- threaten the loss of woodland caribou herds and the outright extinction of other species such as Vancouver Island marmots;
- continue to degrade streamside forests, with a resulting loss of fish habitat and good water quality;
- fail to adequately consult with and reflect the concerns of aboriginal communities;
- fail to curb the use of chemical herbicides;
- continue to sanction large clearcuts that in some cases exceed Canadian provincial and U.S. government guidelines;
- continue to allow clearcutting of severely depleted and endangered forest ecosystems including coastal old-growth forests in British Columbia, redwood forests in California, and biologically rich mixed forests in the Eastern United States, including the Green Swamp and Cumberland Plateau areas.

Furthermore, many of these CSA and SFI certified companies' current practices show little progress from past logging practices. These findings suggest that the CSA-SFM and SFI systems are unable to ensure minimum levels of improvement or even standards conformance in the field.

The FSC case studies looked at in this report tell a different story. They show that the companies and individuals involved have improved on their past forestry practices. As a result, their operations represent a major improvement over status quo industrial logging.

However, this should not be construed to mean unqualified support for all FSC certifications. It must be noted that one of the FSC case studies — Westwind — failed to fully achieve the specific criteria it was measured against. This failure was not so much the fault of the forest manager as a flaw in Ontario's regional standard-setting process and in the resulting draft standards used for the audit that resulted in FSC certification. To help improve this situation, the FSC National Initiative became involved and made a commitment to assist in the resolution of this matter. What became evident through assessment of this scenario was that, due to its balanced stakeholder governance and stringent standards setting requirements, the FSC system provides avenues for addressing outstanding concerns of non-conformance to major environmental and social objectives.

In summary, this report demonstrates that due to a lack of credible standards setting procedures and a lack of independently determined and measurable performance criteria, the CSA SFM and SFI systems contribute directly to the poor performance of their program participants. In contrast, improvements to status quo commercial forestry are clearly evident in most FSC-certified forest management areas.

Portions of Clayoquot Sound's temperate rainforest have been FSC-certified for ecologically respectful logging by Iisaak Forest Resources. Photo: Cindy Hazenboom.

CSA and SFI Case Studies

CSA and SFI certified forest management areas threaten rare and endangered species.

Weldwood (CSA) and Woodland Caribou Habitat in Alberta

Among all North American ungulates, woodland caribou (*Rangifer tarandus*) are the least able to adapt to the environmental changes associated with forestry, agricultural and other industrial developments. In 1984, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) classified the western woodland caribou as rare. In Alberta, woodland caribou and their habitat are now listed as threatened and the Wildlife Act lists them as an endangered species. These caribou are likely to become extirpated in the province if the factors causing their decline are not reversed. Much the same is true of other threatened woodland caribou populations elsewhere in Canada, including British Columbia and Ontario, and in northeastern Washington and northwestern Idaho, where a tiny population of a couple of dozen or less animals is all that remains in the Lower 48 states.

An adequate amount of suitable habitat is the key factor in maintaining viable caribou populations. When there is significant habitat alteration, caribou are much more likely to fall prey to natural predators such as wolves and cougars. In Alberta, the main human activities that cause caribou to decline are industrial forestry, oil and gas exploration and development, and coal mining.

Most caribou range in Alberta has been committed to industrial forestry through Forest Management Agreements or Quota Licenses. Clearcut logging has removed large areas of mature and old-growth coniferous forests, the preferred habitat of many caribou herds. The loss of such forests leads to reductions in the availability of lichens, the caribou's primary winter food. It also reduces the amount of closed canopy forest, which allows caribou to more readily roam and forage for food. Finally, clearcut logging dramatically alters the landscape, making it temporarily attractive for other ungulates such as deer, moose and elk. As those species move in, so do wolves. This inevitably leads to further caribou losses.

Weldwood of Canada, a subsidiary of International Paper, has a forest license based in Hinton, Alberta. Less than two per cent of the area covered by that licence is protected from logging. The forest logged by the company is extremely diverse and includes old-growth forests of Boreal, Sub-Alpine and Montane types. Weldwood's Hinton division logs 2.1 million cubic metres annually, or approximately 6,000 hectares (15,000 acres) of mature and old growth forests each year. These operations recently received Canadian Standards Association (CSA) Sustainable Forest Management (SFM) certification. This certification prompted several Alberta conservation groups to complain that despite a significant decline of woodland caribou that wintered in Weldwood's forest management area, the company continued to clearcut forests used by caribou.

CSA-approved clear-cuts like these typify logging by Weldwood of Canada's Hinton Division, in Alberta. Photo: Helene Walsh.

In 2001, Albertans for a Wild Chinchaga, the Canadian Parks and Wilderness Society's Edmonton Chapter and the Alberta Wilderness Association formally complained to the CSA and the Standards Council of Canada (SCC), regarding the CSA certification of Weldwood. They noted that the CSA Standards (used to audit Weldwood) lacked explicit requirements to protect woodland caribou habitat. This, despite the fact that a recent Alberta government status report had cited high levels of population decline for caribou herds on Weldwood's forest management areas.

"Both the CSA and the SCC defended these certifications because they felt proper procedure had been followed," said Helene Walsh of Albertans for a Wild

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Chinchaga. "Our complaint was not about procedure, but the results of these certified forest management areas. CSA is certifying forests where harvesting activity continues to destroy endangered woodland caribou habitat and contribute to the decline of these herds."

According to the CSA SFM standards, an indicator of biodiversity is that all species on the management area are "prospering through time." Walsh felt this language provided an excellent opportunity to argue for protection of caribou habitat. She asked that there be no logging at all in those forests where woodland caribou spent the winter. This area represented a small percentage of Weldwood's overall area of operation. She also requested that Weldwood supply conservation groups, the CSA and others with maps showing what areas of forest were used by caribou during the winter, where the company logged in the past, and where it intended to log in the future. Her requests were denied.

Woodland caribou are increasingly rare in Alberta and at risk of extirpation as CSA-approved clear-cut logging continues to eat away at remaining old-growth forests. Photo: Karvonen Films Ltd.

Weldwood's letter of response read in part:

"As dedicated stewards of a public resource, our philosophy is to provide opportunities for input and to engage in communication about sustainable forest management.

. . . Unfortunately, the actions of your organization and affiliates clearly demonstrate that there is an unwillingness to work effectively with us to explore issues of common interest . . . You issued a complaint about our certification to the Canadian Standards Association without first discussing the issues with us . . . We are committed to working with community stakeholders and representing public views in our ongoing planning processes. However, given the circumstances outlined above, we do not feel there is value in responding to the questions posed in your December 4, 2001 letter."

While Weldwood claims to have designated a Special Management Area to minimize further caribou losses, it continues with large-scale clearcuts that convert old-growth forest to dense, even-aged plantations that are of little or no value to this rare species. In spite of formal complaints, neither the CSA nor the Standards Council of Canada took meaningful actions to address the conflict between Weldwood's desire to keep logging and the CSA's requirement to ensure the prosperity of all species through time.

TimberWest (SFI) and the Vancouver Island Marmot

Vancouver Island marmots (*Marmota vancouverensis*) are on the brink of extinction, gone from nearly all the areas they once inhabited. This unique species makes its home in the sub-alpine meadows of the mountains on British Columbia's Vancouver Island. The extirpation of marmot colonies has accelerated since the 1980s leading to a precipitous decline from 300 animals to less than 80 today. Most remaining animals are living in captivity in an attempt to increase their numbers through captive breeding. Only about 30 animals remain in the wild. These incredibly low numbers make the Vancouver Island marmot one of Canada's most endangered species. Successful habitat restoration, as well as a thriving captive-breeding and reintroduction program, is critical if the extinction of this unique species is to be avoided.

Like most species' declines, the root causes of marmot losses are linked to severe landscape alteration. Activities, such as clearcut logging have altered the ecology severely. According to researchers, deforestation has concentrated marmot populations in small geographic areas, making them vulnerable to predators such as golden eagles, cougars and wolves. Deforestation may also be contributing to site-specific changes in vegetation and climate, which increases ill health among the remaining marmots.

While clearcutting initially seems to expand marmot habitat, the logging activity and resultant habitat change appears to significantly reduce the long-term survival rates of the remaining animals. Some

researchers believe that plant regeneration on these cutblocks, which temporarily resemble the sub-alpine terrain favoured by marmots, also provide cover for predators. Another effect of clearcut logging has been to entice young marmots to settle in fresh clearcuts. Some conservation biologists refer to such areas as population sinks. When this happens, the animals don't venture further afield to other areas where they might meet – and mate – with marmots from other colonies.

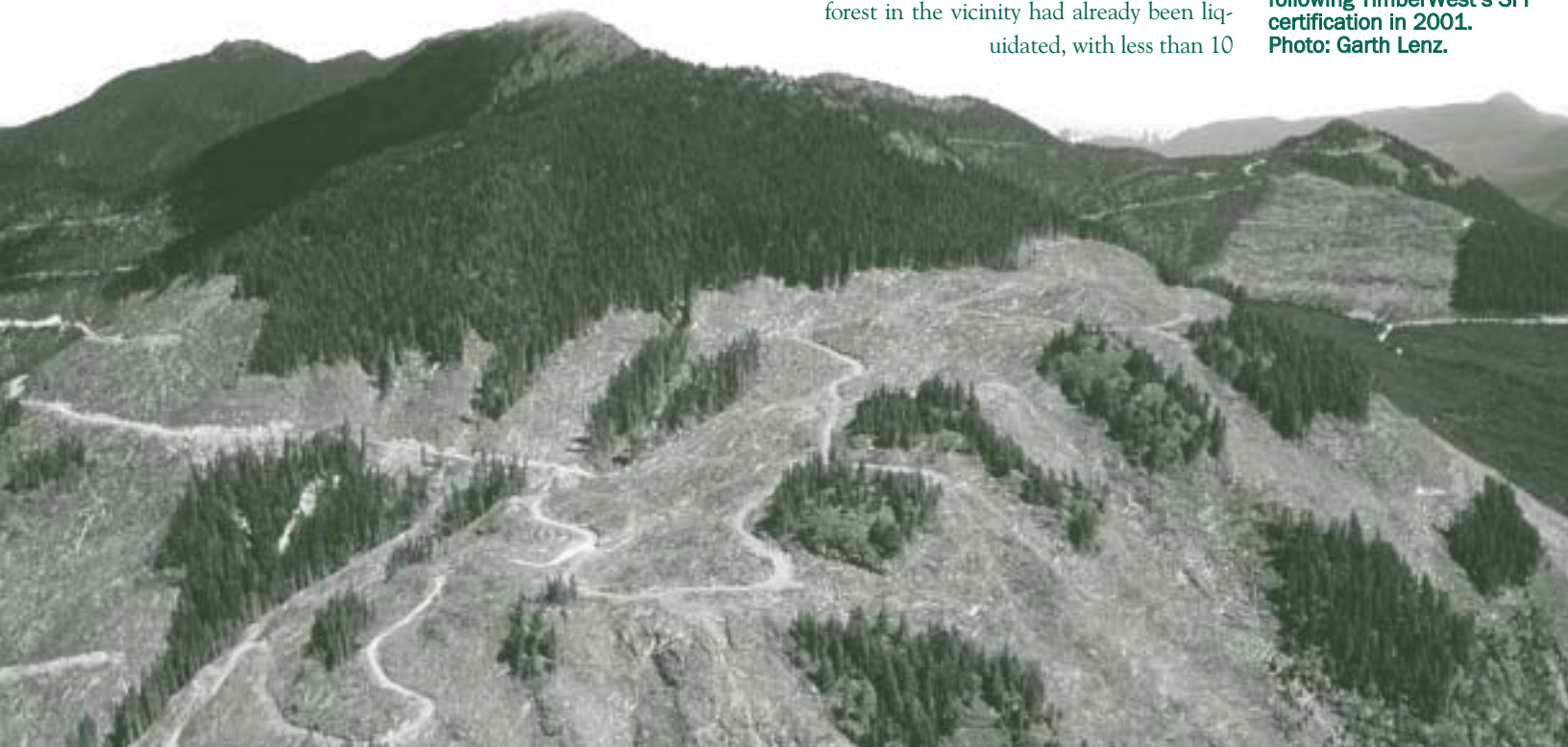
TimberWest Forest Corporation is the largest owner of private forestlands in western Canada. It owns more than 330,000 hectares (825,000 acres) of private lands mainly on Vancouver Island and also has access to annual Crown land logging rights of 1.2 million million cubic meters of timber. According to the company's web site (http://www.timberwest.com) Timber West became the first Canadian company to complete third-party sustainable forest management certification for its private lands under the American Forest & Paper Association's North American Sustainable Forestry Initiative (SFI) SM licensing program." The certification was granted in November, 2000.

SFI standards state that program participants should promote habitat diversity and develop wildlife policies and programs to protect threatened and endangered species. In 2002, the SFI standards were revised to additionally require companies to develop plans to protect imperiled species and their habitat.

While TimberWest has been a major benefactor of Vancouver Island's Marmot Recovery Program, donating over half a million dollars toward its activities, many conservation groups say the company is not providing adequate protection for wildlife habitat through its forest management plans and practices. At the same time, the company has made millions of dollars by logging forests that may be critical to the survival of the island's last marmot colonies.

The endangered Vancouver Island marmot. Photo: Wilderness Committee files.

The company describes itself as "the largest harvester of second growth in BC," yet it continues to log remaining stands of old growth forest, often within close proximity of Vancouver Island marmot colonies. In 1999, TimberWest began logging an old growth stand near the Green Mountain marmot population in the Nanaimo Lakes district. Most of the old-growth forest in the vicinity had already been liquidated, with less than 10



Logging by TimberWest near Vancouver Island's Green Mountain where the local marmot colony has all but vanished. Expect to see more logging like this following TimberWest's SFI certification in 2001. Photo: Garth Lenz.

per cent left on mountaintops and steep sidehills. As TimberWest logged some of the last remaining old-growth timber from this area, the Green Summit marmot colony plummeted to just three animals.

Despite the dismal predicament facing the Vancouver Island marmot, Andrew Bryant, Director of the Marmot Recovery Program, believes that forestry and marmots may still find a peaceful co-existence. But much work must be done to make this a reality. "We have to examine ways in which to successfully reintroduce the animals into an altered landscape, using innovative measures to enhance reproductive rates, while reducing current predation and applying long-term landscape level planning approaches to forestry," Bryant says. "By looking closely at natural, historic ecosystem processes, we can determine pathways for future harvesting activity at both the stand and landscape levels. In trying to emulate natural disturbances, we need to closely mimic these historic patterns, including all of their inherent characteristics, including frequency, distribution and structure. Simply using stand-replacing occurrences (such as windthrow and wildfire) to rationalise clearcut logging is inadequate. Important features like the amount of fallen timber (coarse woody debris), snags and full cycle trees that naturally occur in such events need to be a part of pre-harvest modeling in order to contribute meaningfully to the restoration of natural forest conditions, landscape connectivity and wildlife habitat."

Coho Salmon. Photo: Barry Kovish.

In the case of the Vancouver Island marmot, there is broad agreement that the ultimate goal is to establish a self-sustaining wild population of marmots. While captive breeding, relocation and reintroduction are necessary remedial measures, a fundamental change in forest management is essential.

"How do we restore the landscape ecology?" Bryant asks. "What is the capacity of the existing landscape to bear further harvesting? What precautionary measures are needed to ensure we don't compromise biodiversity again? And what are today's ecological limits to forest use?"

Protection of Riparian Forests and Water Bodies

CSA-approved forest management threatens riparian forests and water bodies.

Western Forest Products (CSA), Northern Vancouver Island

Forests adjacent to streams, lakes and wetlands are critical in maintaining fish habitat, as well as water quality for human consumption. Known as riparian forests, these forests also provide shade, nutrients, stability to stream banks, retention of spawning gravel in streambeds, wildlife habitat, travel corridors, and feeding, foraging and nesting cover.

Though they represent only 10 to 12 per cent of BC's coastal forests, riparian areas are extremely important because this is where some of the most important ecological processes occur. For example, it is here that bears feed on salmon and in so doing transfer valuable nutrients to other life forms in the forest including mammals, birds, insects shrubs and trees. The interdependence of these species and the general health and well being of the surrounding riparian forest requires careful assessments and sensitive approaches to any proposed logging activity.

The BC provincial Forest Practices Code, which was introduced in 1995 and is in the process of being phased out and replaced by more industry-friendly rules, offered some limited protections to riparian forests. But even under the Forest Practices Code, logging was permitted right up to the banks of small fish-bearing streams (called S4 streams) which often

provide important rearing habitat for salmon fry.

The Forest Practices Code also permitted logging of smaller (S5 and S6) streams, which, though not fish-bearing, are often directly upstream from fish-bearing reaches. The result was sedimentation of downstream, fish-bearing streams.

Research studies conducted in the past few years suggest that even the largest unlogged riparian reserves legislated under the Code (30 metres) were inadequate to limit damage to fish-bearing streams.

In Canada, riparian management falls under the jurisdiction of both the federal and provincial governments. In the spring of 2000, the Federal Department of Fisheries and Oceans (DFO) notified the BC Ministry of Forests that riparian management guidelines under the Forest Practices Code were inadequate for protecting fish habitat as required by the federal *Fisheries Act*. At that time, DFO exercised its mandate under the *Fisheries Act*, and set interim guidelines for small fish-bearing streams.

Western Forest Products (WFP) manages over 885,000 hectares (2.2 million acres) of public lands in the form of Tree Farm Licenses, forest licenses and other tenure types in BC's coastal rainforest. WFP's annual timber harvest has been more than four million cubic metres annually, making its parent company, Doman Industries (recently taken over by Brascan Corporation), the second largest coastal woodland operator in the province of British Columbia. In 2001, WFP was certified by Quality Management Inc., (accredited CSA SFM registrars) for 230,000 hectares (575,000 acres) of their tenured holdings on northern Vancouver Island. WFP has also been approved for CSA Chain of Custody (CoC) certification, allowing WFP to apply the CSA label to some of its lumber.

Even with this CSA certification, WFP's protection of small fish streams is seriously inadequate. The company still considers current best practices in riparian forests to be the standards set out in the old Forest Practices Code. Despite DFO staff recommendations to comply with the much tougher Federal Fisheries Act, WFP management activities have continued to be in non-compliance with that Act.

This raises questions about why WFP received the certification in the first place, because under CSA SFM rules companies are supposed to be in compliance with relevant legislation (both provincial and federal). As recently as 2001, WFP was known to be in significant non-compliance with the Forest Practices Code. An audit of the company's logging activities by BC's Forest Practices Board uncovered significant problems including:

Recent WFP logging in BC's Great Bear Rainforest. While this logging was not certified, WFP has yet to indicate that its logging methods will change under CSA certification.
Photo: Ian McAllister.

- poor road construction around streams;
- placing blasted rock in the bed of a fish-bearing stream;
- diverting a stream by building a logging road; and
- failing to complete proper assessments of streams in proposed logging areas prior to roads being built.

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There *are* working models of riparian protection in the Pacific Northwest that do work. For example, the Clayoquot Sound Scientific Panel's recommendations which apply to thousands of hectares of land in and around Clayoquot Sound on the West Coast of Vancouver Island, the Forest Ecosystem Management Assessment Team (FEMAT) recommendations, and FSC's BC Regional Standards. Though they all provide unique and different approaches to the protection of riparian forests, they are all considered more scientifically credible and ecologically responsible than British Columbia's minimal regulatory requirements. With the advent of an industry-designed, self-regulatory model to replace the Forest Practices Code, there is a greater need than ever for stringent riparian protection rules in certification systems.

Chemical Pesticide Use

SFI-approved forest management fails to restrict the use of chemical pesticides, herbicides and other toxins.

International Forest Products (SFI) and Herbicide Applications

Laws and regulations around the use of chemical pesticides vary from province to province in Canada, and state to state in the United States. Many jurisdictions have limited appeal mechanisms to address public concerns about proposed pesticide use. Others provide maximum discretionary authority to landowners and forest managers. As a result, opportunities for members of the public to have health and environmental concerns adequately addressed are extremely limited.

A number of FSC National and Regional Standards require strict limitations or restrictions on chemical pesticide use, including the explicit prohibition of the use of chemical pesticides with rare, site-specific exceptions made for "calamities" and "aggressive exotics", where "ecologically sound alternatives are not available." Two of the Canadian Regional Standards (Maritimes and British Columbia) require that chemical pesticides be phased out over time.

In contrast, the CSA SFM standards do not address the issue at all and the SFI only requires "minimizing use", which, though a major improvement, still makes chemical use discretionary.

International Forest Products Limited (Interfor) is one of Western Canada's largest logging and sawmilling companies. Interfor has 59 logging operations and 6 sawmills in the coastal region of British Columbia in addition to a logging operation and sawmill in the central interior region of the province. In October 2000, Interfor signed a license agreement with the American Forest & Paper Association's Sustainable Forestry Initiative (SFI) SFM program. At its web site (www.interfor.com), the company describes the program as an "exacting standard that measures a participant's actual activities in support of sustainable forestry."

Over the last five years, International Forest Products has been involved in at least 8 disputes of pesticide application permits at the BC Environmental Appeals Board. These appeals, made by dozens of coastal First Nations, conservation groups and other stakeholders, have primarily involved Interfor permits to spray the herbicide Vision on various logging sites throughout its coastal forest licenses. Interfor's stated reason for using Vision is to allow for the successful growth of crop trees by eliminating competing native plant species including salmonberry, elderberry, red alder and devil's club.

The appeals of these pesticide permits were made in order to protect traditional medicinal and food plants; prevent the contamination of riparian systems and protect wildlife affected by the depletion of both

SFI-certified clear-cut logging at Parker Creek. The area is part of BC's Great Bear Rainforest and was logged by International Forest Products following certification by SFI. Photo: Ian McAllister.

native plant species and fish. First Nations appellants asserted that the company had not conducted adequate consultation with the First Nations' authorities, whose lands were subject to these chemical applications. Additionally, substantial scientific evidence was provided to demonstrate that the use of glyphosate and the "unknown" ingredients (surfactants and inert ingredients) of Vision posed significant threats to the overall integrity of the ecosystems treated.

(Glyphosate-containing products are acutely toxic to animals. Laboratory studies have found adverse effects in all standard categories of toxicology testing, including medium-term toxicity (salivary gland lesions), long-term toxicity (inflamed stomach linings), genetic damage (in human blood cells), effects on reproduction and carcinogenicity. In studies of people (mostly farmers) exposed to glyphosate, exposure has been linked to an increased risk of miscarriages, premature birth, and non-Hodgkin's lymphoma.)

In light of evidence provided by the appellants, the Environmental Appeals Board upheld a few of the appeals and imposed conditions to most of the pesticide permits; conditions that required Interfor to consult with the appropriate First Nations, provide riparian buffer protection measures, use only ground-based (as opposed to aerial) applications and take precautionary measures to ensure that traditional food, brush gathering and wildlife foraging sites were protected.

Despite EAB rulings and numerous public appeals around glyphosate use, Interfor persists in using this chemical over the objections of numerous groups and individuals.

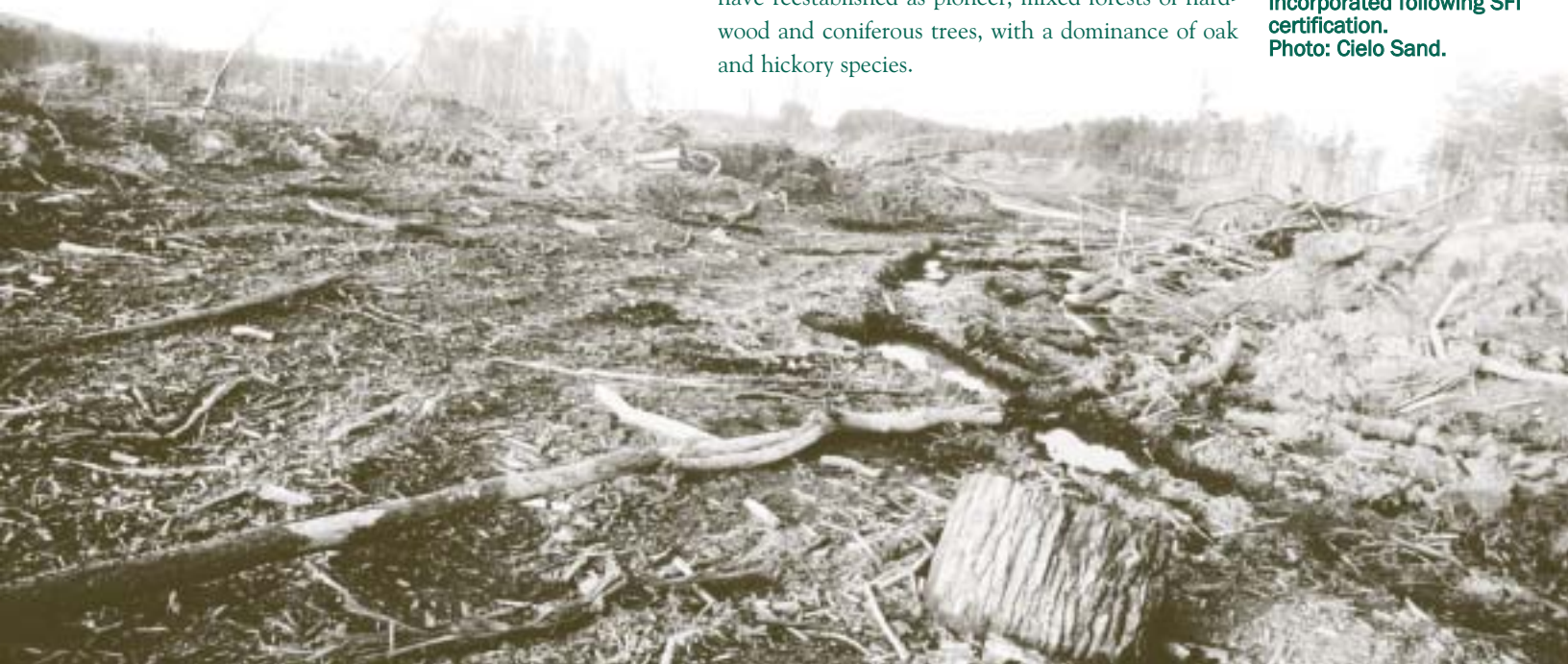
SFI-certified logging by International Forest Products in the Quatlenaday valley, part of BC's Great Bear Rainforest.
Photo: Ian McAllister.

Protection of Endangered Forests

SFI-certified forest management practices threaten endangered forests.

Bowater (SFI) and Cumberland Plateau, Tennessee

The Cumberland Plateau of Tennessee contains some of the largest remaining tracts of contiguous, temperate deciduous forest in North America; a rare occurrence amongst the sea of industrial clearcuts and monoculture pine plantations in the Southeastern United States. Though extensively logged since the late 1800s, the Cumberland forests have reestablished as pioneer, mixed forests of hardwood and coniferous trees, with a dominance of oak and hickory species.



Rare temperate deciduous forests on Tennessee's Cumberland Plateau continue to be clear-cut logged by Bowater Incorporated following SFI certification.
Photo: Cielo Sand.

The Nature Conservancy says the Cumberland Plateau is the most diverse of any forest in the United States. The World Wildlife Fund adds that the Appalachian Mixed Mesophytic Forest Ecoregion, including the Cumberland Plateau, is one of the 13 most critically endangered forests in North America.

According to a recent report by the Sewanee, Tennessee-based University of the South's Landscape Analysis Laboratories, a significant portion of the intact forest cover on Tennessee's Cumberland Plateau has disappeared since 1981. Commissioned by the U.S Environmental Protection Agency (EPA) and the U.S. Fish and Wildlife Service FWS, the report used aerial photography, satellite images and on-the-ground assessments to measure changes in forest canopy and the ecological consequences of native forest removal over the previous 20 years. The study sampled 7 of the 16 counties in the Cumberland Plateau and found that over 15 per cent of the forest cover and 66,000 acres (26,400 hectares) of native forest has been lost since 1981. Just under three quarters of this loss was caused by logging and the subsequent planting of loblolly pine trees which replaced the original forest. According to Jonathan Evans, co-author of the study and assistant professor of biology at the University of the South, "the Cumberland Plateau is the most important conservation challenge in the United States right now".

Under SFI certification, Bowater will convert more natural forests to Pine Plantations. Photo: Doug Murray.

Over 70 per cent of the native forest removal examined in the study was in the form of clearcut areas greater than 120 acres (48 hectares) in size (the average clearcut size limit under the SFI). Once logged, the areas were planted with non-native pine trees. The study went on to note that these plantations supported only about half the bird species found in the plateau's native oak-hickory forests. "This vast conversion to an agricultural ecosystem is relatively new," noted Dr. Evans. "There's a big difference between sustainable forestry and wholesale conversion of forests in to agricultural plantation. There's nothing wrong with agriculture. The question is, how much do we convert?"

Bowater Incorporated, based in Greenville, South Carolina, is one of the largest private landowners in the Cumberland Plateau. According to the company's web site (http://www.bowater.com), Bowater has 12 pulp and paper mills in the United States, Canada and South Korea and 13 North American sawmills that produce both softwood and hardwood lumber. Bowater's Pulp division is responsible for the production of 1.25 million metric tons of market pulp per year, both hardwood and softwood pulp. Bowater's Calhoun, Tennessee facility produces 756,000 tons of paper and 195,000 tons of hardwood pulp annually.

Bowater achieved SFI certification in February 2003. The certification applied to 471,000 acres (188,400 hectares) of its timberlands in Alabama, Georgia, North Carolina and Tennessee (audit by KPMG Performance Registrar). Upon receiving the SFI stamp of approval, Richard Hamilton, president of Bowater's Forest Products Division, claimed in a company press release that the certification "demonstrates to both the public and our customers that we are providing quality forest products while also protecting the forest resource for the future."

The big question is whether this certification will result in any tangible reduction in what has proven to be a remarkable rate of deforestation over the course of the past two decades. The groups commissioning this report believe not. Why?

As of 1999, there were 145,600 acres (58,240 hectares) of pine plantation on the plateau. SFI standards will allow Bowater to continue clearcutting the plateau's forests and further converting them to pine plantations, with individual clearcuts of up to 120 acres (48 hectares). Furthermore, any number of these 120-acre cuts can be adjacent to each other while separated by only a small buffer of trees. SFI's permission of such logging patterns will, in effect, allow for the further conversion of thousands of acres

of Tennessee's diverse native forests to monoculture pine farms.

Forestry experts and industry experts project that, at the current rate of expansion, hardwood logging will double over the next 20 years, signaling the fragmentation and ultimate destruction of the Cumberland Plateau's unique forests.

Responsible Harvesting Practices and Maintaining Natural Forests

CSA and SFI-approved forest management continues to diminish natural forests.

International Paper (SFI) and Green Swamp, North Carolina

The Green Swamp once formed a vast area of the Southeastern United States, covering over 2 million acres (800,000 hectares) of land in what is now the state of North Carolina. In its original state, it was unlike most swamps, and consisted of extensive wetlands dotted with islands of wiregrass, longleaf pine savannahs and dense, nearly impenetrable, shrubby thickets called pocosin. Pocosin is the Algonquin word for "swamp on a hill", which is fitting considering that the region is between 50 and 60 feet above sea level. The swamp's shrubby thickets absorb rainwater like a giant sponge, slowly releasing it to the surrounding aquifers and rivers, helping to maintain a consistent water table in time of drought and preserve the estuary salinity levels critical for fish and shellfish. The region is famous for its biological diversity, including at least 14 different species of insectivorous plants. The wetlands also harbor a great variety of bird species.

Today, most of the original Green Swamp area is privately owned by logging companies and has been converted primarily to exotic pine plantations. The area has an extensive network of ditches and raised roadbeds and much of it has been drained. The alteration of the wetlands' native hydrology and structure for logging purposes has resulted in the loss of a great deal of animal and plant life. By 1991, nearly half of these wetlands had either been filled or drained so that they no longer performed their natural functions. Today, less than 350,000 acres (140,000 hectares) of Green Swamp remain intact. The North Carolina timber industry is estimated to be responsible for over 53 per cent of wetland loss in the state.

Some forest companies, including International Paper (IP), continue to convert wetlands into plantations, using agriforestry techniques, such as monoculture, and fertilizer and herbicide applications to satisfy increasing fiber demands of regional pulp and paper mills. This contributes to the continued decline of indigenous plant and animal species, such as the Venus Flytrap, Red-cockaded Woodpecker and many local freshwater fish species.

With more than 12 million acres (4.8 million hectares) of private lands in the United States, International Paper (IP) is one of the largest landowners in the world. Operating in over 50 countries, IP subsidiaries include Weldwood of Canada and Champion International. As an AF&PA member, IP followed through with its commitment to have all of its private land holdings in the United States SFI certified. This occurred in 1999. Unfortunately, this certification has not ensured responsible logging or silviculture practices.

Why? Because the requirements imposed by SFI certification are not stringent. As a result, they offer little of lasting environmental value. For example, under SFI standards companies can continue clearcut logging, with individual cutting areas of up to 120 acres, or 48 hectares, in size. As noted in the earlier discussion of Bowater's work in the Cumberland Plateau, clear-

Once biologically rich wetlands in the Green Swamp area in North Carolina continue to be converted to pine plantations following SFI-approved clear-cut logging by International Paper. Photo: Gean Seay.

FSC Forest Conversion and Plantation Restrictions

Unlike SFI's lax standards, FSC requires forest managers to maintain intact, enhance or restore the ecological functions of forests,including forest regeneration, genetic, species, and ecosystem diversity, and, natural cycles that affect the productivity of forest ecosystems. Furthermore, FSC states that forest conversion to plantations or non-forestlands shall not occur, except in circumstances where conversion involves a very limited portion of the Forest Management Unit (that is regionally determined); does not occur in High Conservation Value Forest areas; and, enables clear, substantial, additional, secure and long-term conservation benefits within the certified areas.

FSC additionally requires that regional initiatives cap maximum allowable areas for conversion and ongoing plantation use. In the FSC BC Regional Standards, while the logging of old growth forests on public lands is permitted (using a precautionary approach), forest managers are only allowed to maintain up to a maximum of 10 per cent of their certifiable forest management area as plantations. All lands in excess of these 10 per cent limits that have already been converted (or significantly altered), are required to be restored back to natural forest conditions.

cuts do not have to be spaced far apart, meaning that the worst effects of industrial forestry remain.

SFI program participants are also supposed to have plans in place for retaining snags, downed woody debris and other trees deemed important for certain wildlife species in order to encourage a diversity of wildlife in their areas of operation. And they are supposed to "minimize" chemical use following logging activities. However, these are not binding requirements. On the contrary, SFI's lack of binding standards means that natural forests are not being maintained or restored. The result is that status quo industrial forestry remains the standard. Clearcuts followed by the planting of pine plantations are the order of the day in the Green Swamp.

SFI certified clear-cut logging in old-growth redwood forests in Humboldt County, California. Photo: We Save Trees.

In order to protect, maintain and restore the biodiversity and ecological integrity of the Green Swamp, no further conversions of its natural ecosystem conditions should be allowed and considerable investments should be made in restoring enough of the converted wetlands back to their original state to allow the Green Swamp to remain intact and flourish in the long term.

Pacific Lumber Company (SFI) and the California Redwoods:

The Pacific Lumber Company (Palco) started in 1863 in Humboldt County, California with the purchase of 6,000 acres (2,400 hectares) of land at the price of $1.25 per acre. In 1986 Palco was taken over by Maxxam Inc., of Houston, Texas.

Palco is the largest manufacturer of redwoods lumber in the world. In 2001, it achieved third-party certification of its Northern California logging operations through the Sustainable Forestry Initiative program.

In the past two decades, Palco logging has been the target of numerous protests. The protests have focussed on the company's logging of ancient redwood forests in California's Headwaters region.

In 1998, the California Department of Forestry (CDF) notified Palco that its license to log was being revoked because of repeated violations of California's forestry regulations. The company was said to have:

- violated Forest Practice Rules;
- committed criminal misdemeanors;

- destroyed domestic water sources;
- triggered landslides; and
- violated the Endangered Species Act.

Following this controversy, Palco signed the Headwaters Forest Agreement. The agreement preserved more than 7,000 acres (2,800 hectares) of ancient redwoods in perpetuity. The $380 million deal involved the acquisition of these lands from Palco by the State of California. It also included a new habitat conservation plan and sustained yield plan for harvesting adjacent areas.

The Headwaters deal was hailed by some as a precedent-setting plan, a template for future conservation agreements. Others weren't so sure. They questioned the strength of the deal's conservation and sustained yield management plans.

"While these habitat conservation plans did involve protection of some of the ancient forest groves, the permanent protection of the Headwaters grove came at great public expense," said the American Lands Alliance. "The taxpayer paid Maxxam to comply with our Endangered Species Act."

Following the deal, many conservation groups continued to be critical of Palco's ongoing work. They maintained the company never properly implemented plans designed to protect endangered species, such as coho salmon, spotted owls and marbled murrelets. Local residents protested Palco's continued logging of some of the last remnant unprotected old growth in the region, while others accused the company of harming drinking water in communities such as Freshwater.

According to the American Lands Alliance, Palco's sustained yield plans will further convert redwood forests to primarily Douglas fir forests, with logging rates that far exceed the rates reasonably expected of natural forest growth and restoration of natural forest ecosystem conditions. And none of these losses will be prevented by the company's SFI certification.

In the latest development in this ongoing saga of environmental losses, the District Attorney's office in Humboldt County announced in February 2003 that it was suing Pacific Lumber Co. It alleged that logging company lied to government agencies about its plans after the historic Headwaters Forest agreement.

The lawsuit claims that the company filed fraudulent data to support its Environmental Impact Report, resulting in "major landslides causing destruction to ancient redwoods, serious harm to Humboldt Bay, and serious harm to streams, bridges, roads, homes and property rights of the people of Humboldt County."

The suit, filed in Humboldt County Superior Court, also claims that Palco deceived state and federal agencies by submitting false landslide data so that it could log an additional 100,000 trees on steep and unstable slopes. The District Attorney is seeking a $2,500 civil penalty for every tree cut under Palco's 10-year logging plan, of which up to 30,000 trees have already been cut. This means the firm could be liable for as much as $75 million in penalties.

Logging's aftermath: Trees downed by the Pacific Lumber Company in 2002. Logging approved by SFI. Photo: We Save Trees.

Large clear-cuts in the Crossroute Forest in northern Ontario. Photo: Earthroots.

According to the Environmental Protection Information Center: "If the County's suit is successful, it will show that the whole Headwaters deal was approved on lies and deceit. That would mean that all the (environmental concessions) approved under the deal were illegal."

Ananda Lee Tan

Abitibi Consolidated (CSA) and the Boreal Forests of Ontario

Abitibi-Consolidated (Abitibi) is the world's largest producer of newsprint and uncoated groundwood paper, with 27 paper mills in Canada, the United States, the United Kingdom and Asia, as well as 22 sawmills, three remanufacturing facilities, and 10 recycling centres.

The company's Fort Frances-Flanders Division (Crossroute Forest) was certified by the CSA in January of 2003. Located in Northwestern Ontario, west of Thunder Bay, the Crossroute Forest is a so-called transition forest and is comprised of both Boreal and Great Lakes-Laurentian forest types.

What makes this certification so controversial is Abitibi's involvement in an ongoing dispute surrounding the Ontario Ministry of Natural Resources (OMNR) and its approval of excessively large clearcuts that contravene provincial regulations. In *Clearing the Forest, Cutting the Rules,* a recent publication by the Sierra Legal Defence Fund (SLDF) and Ontario conservation group Earthroots, the OMNR is said to be complicit in allowing companies to clearcut forests in excess of provincial regulations.

These regulations are part of 115 conditions that govern forestry in Ontario. The regulations, written by the province's Environmental Assessment Board (EAB) in 1994, resulted from lengthy public consultations. At the time, in order to strike a compromise on the hotly debated issue of clearcut size, the EAB ordered OMNR to implement a 260-hectare (650 acre) size restriction on clearcuts. Companies could only exceed this rule if they demonstrated sound biological or silvicultural reasons for doing so.

The Earthroots/SLDF study found that this restriction on large clearcuts was routinely ignored in 31 of 36 forest management areas. The OMNR is now under investigation by the EAB for allowing such logging to take place.

The most common reason cited by forest companies in support of large-scale clearcuts is that they mimick catastrophic natural events, such as large forest fires, a position that has been dismissed by many leading forest ecologists.

Abitibi Consolidated's CSA-certified management plans include 10 clearcuts in the Crossroute Forest that are over the 260 hectare limit. What is most significant is that these 10 cuts represent over half (54.1 per cent) of the total area being cut. Of these areas,

Logging by Abitibi Consolidated in northern Ontario. The company, which received CSA-certification in 2003, plans many more large clear-cuts in the area, including one that could exceed 7,900 football fields in size. Photo: Earthroots.

the largest planned cut is 3,454 hectares (8635 acres). This is more than 7,900 football fields in size. While historic evidence shows rare fire disturbance of such scale, the frequency of fire occurrence has long been over-represented on the landscape by large clearcuts. Aside from apparent non-compliance with provincial rules, such practices will further degrade the ecosystem.

A coalition of Ontario conservation groups has urged the OMNR to make ecosystem-based planning a requirement of all forest management planning across the province. If this happened, timber supply would become a product of a long-range planning process that considered habitat requirements, aboriginal rights and concerns, non-timber forest values, protected areas, long-term community needs and environmental impacts. For more information on this, visit the web site www.forestsfortommorrow.org.

Accommodating Aboriginal Peoples' Interests

CSA-approved forest certifications fail to provide meaningful accommodation of First Nations' interests.

Canadian Forest Products (CSA/SFI) and the Carrier Sekani First Nation

Canadian Forest Products (Canfor) is the largest producer of softwood lumber in Canada. Canfor's timber is almost exclusively derived from forest licenses in British Columbia and Alberta. Like most forest licenses in Western Canada, the majority of these tenured public lands are located in First Nations' traditional territories. Most of these territories are lands where local First Nations have not signed treaties relinquishing their title and rights. Canfor has had 1.7 million hectares of their area-based tenures CSA certified by KPMG Performance Registrar, including the 180,000 hectares (450,000 acres) of Tree Farm License (TFL) 30, in the vicinity of Prince George, British Columbia.

In addition to its CSA certifications, Canfor recently achieved SFI certification for all of its area-based tenures in northern British Columbia. While Canfor's SFI certification does not require any engagement with aboriginal peoples, Canfor's CSA certification requires the company to demonstrate special efforts in seeking the participation and involvement of aboriginal forest users and communities in their public advisory groups. While CSA participants must document any efforts made in seeking aboriginal participation, there is no requirement that they actually secure that participation. Nor is there a requirement that they obtain the consent of First Nations prior to forestry activities on their traditional lands.

First Nation communities often see themselves as stewards of the land as opposed to stakeholders. This perspective stems from the long history and interdependence that aboriginal communities have had with their natural environment, a relationship that, despite colonial settlement, continues to bind their long-term interests to that of the lands upon which they live. As stewards, the interests of Aboriginal peoples in forest management extend beyond sectoral interests and cover the plethora of environmental, social and economic values. As stewards, First Nation communities

A Duty to Consult

The Haida Nation v. B.C. and Weyerhaeuser ruling in February 2002 affirmed that the provincial government and forestry companies have a legally enforceable duty to the First Nation "to consult with them in good faith and to endeavor to seek workable accommodations." This duty applied to the granting or replacing of forest tenures, or any decisions that alienated the First Nation from forest resources or decisions pertaining to their management. Building on the Supreme Court of Canada decision in Delgamuukw and the BC Court of Appeal decision in Taku River Tlingit, the BC Court of Appeal held that this obligation to consult and accommodate existed even if aboringial title had not yet been proven in court.

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believe that all forest management of their traditional lands should require not simply their consultation, but their direct involvement and consent.

Canfor's TFL 30 is located largely on the territories of the Lheidli-T'enneh First Nation. While Canfor claims a high level of First Nations participation through the attendance of the Lheidli-T'enneh in CSA public advisory meetings, the significance of this is perceived differently by Lheidli-T'enneh leaders. While appreciating the opportunity to develop a working relationship with the logging company, the Lheidli-T'enneh note that CSA requirements don't go far enough.

"Canfor has come a long ways in recent years to working with First Nations on sustainable forest management," says Barry Seymour, chief of the Lheidli-T'enneh First Nation. "However, from our perspective, there is yet much more development required to achieve meaningful and adequate levels of engagement. Such engagement is outlined in the Forest Stewardship Council framework."

One of the biggest barriers to meaningful interactions between the company and the First Nation remains human resources and capacity, Chief Seymour says. Many First Nations still do not have the capacity required to meaningfully engage in public advisory group processes as typically set out by CSA certified companies. That lack of capacity includes mapping expertise, and forestry and forest sciences knowledge, Seymour says.

While forest companies have dealt directly with numerous First Nations' bands through CSA advisory groups, they often avoid communicating with larger aboriginal political organizations that do have some capacity to participate on a more equal footing with the companies.

In Canfor's case, the company has made no effort to engage the Carrier Sekani Tribal Council (CSTC), which represents a number of First Nations' traditional territories that are affected by Canfor's forest management activities in the B.C. central interior. Following a B.C. Court of Appeals ruling in February 2002, in *Haida Nation v. B.C. and Weyerhaeuser*, the CSTC sent a notice to all forest companies operating on Carrier Sekani traditional territories. The notice advised companies operating in the territories as well as provincial government officials, that they must accommodate the interests of Carrier Sekani First Nations. This had to occur before proceeding with any further resource extraction or land use. As of March 2003, when this report went to press, there had been no response from any of the forest companies served this notice.

This silence prompted the Carrier Sekani Tribal Council to issue the following warning to Canfor and other forest companies: "The international markets should be aware that Canadian Forest Products' CSA and SFI forestry certifications are inadequate due to their inability to enforce the logging company's compliance with social, ecological and fiduciary responsibilities towards the land and its peoples. Until Canfor and other forest companies clearly demonstrate recognition of First Nations' title and rights, and respectfully seek mutually-agreed-to protocol arrangements with the Carrier Sekani First Nations, their activities on First Nations traditional territories will be deemed unlawful and socially irresponsible."

FSC Case Studies

The following four case studies involve forestry certifications through the Forest Stewardship Council's certification system.

Three of the certifications are chosen because they highlight good outcomes on the ground or in nearby communities following certification. The three are the Pictou Landing certification, the Iisaak Resources certification and the certification of Al Hopwood's woodlot operation.

The fourth FSC certification, involving Westwind, is included because it shows how problems can arise during and after an FSC certification. FSC certification processes are by their nature adaptive. And while problems arose in this certification, it is evident that attempts have been made and will continue to be made to address them.

Protecting Land, Water and Wildlife

Woodlot W0082 (FSC), Vancouver Island, BC

A bird's-eye view of Al Hopwood's 432-hectare (1080-acre) woodlot shows how different his forest management practices are from those of adjacent forest managers. His woodlot's dense forest cover, particularly along water courses, stands in stark contrast to the skinny riparian reserve strips in the adjacent private lands owned by industrial forest companies. While these neighboring stream buffers are the baseline requirements of British Columbia's private land regulations (Forest Land Reserve Act), Hopwood's high stand-level retention through selective logging practices allow for far greater protection of both aquatic and terrestrial-riparian values.

Woodlot W0082 is located 10 kilometres west of Courtenay, in the Campbell River Forest District. The forest is comprised primarily of second growth forest that has regenerated following logging and wildfires in the early part of the last century. The term of tenure for woodlot licenses in British Columbia is 20 years, with licenses renewed every 10 years. The neighboring lands are dominated by large timber companies' private holdings, with small family-owned lands scattered throughout. All the lands adjacent to the woodlot have been clearcut logged, leaving Hopwood's domain an isolated island.

Hopwood carefully determined the ecological limits to logging on his woodlot prior to its FSC certification by Silva Forest Foundation in May 2000. Areas of shallow, dry, nutrient-deficient soils and steep terrain were excluded from logging as were forests inhabited by wildlife species of special concern including Western Screech-Owls and (red-listed) Queen Charlotte goshawks. Wildlife, fisheries and biodiversity values are further protected through Hopwood's general approach to forestry and logging practices.

Hopwood has done a good job of designating zones of protection for major riparian ecosystems, and has committed to not logging certain trees in order to protect wildlife species and the wider ecosystem.

Al Hopwood operates an FSC-certified woodlot on Vancouver Island. Hopwood's logging protects streams and wildlife species by leaving plenty of trees standing. Photo: Garth Lenz.

The Silva Forest Foundation's Public Summary for Woodlot W0082 found that Hopwood had:

- protected riparian ecosystems adjacent to the three largest streams, with provisions for low-intensity logging and no machine travel or dead wood extraction;
- established reserves and/or low-intensity buffers in areas with special wildlife habitat and other values, including the area of a recently discovered Queen Charlotte goshawk nest, a wetland bear wallow, and a reach of Supply Creek containing cutthroat trout;
- reduced logging intensity and provided small-scale connectivity by maintaining forest cover, stand-level structures such as large trees, snags, and large fallen trees, and protected riparian corridors; and

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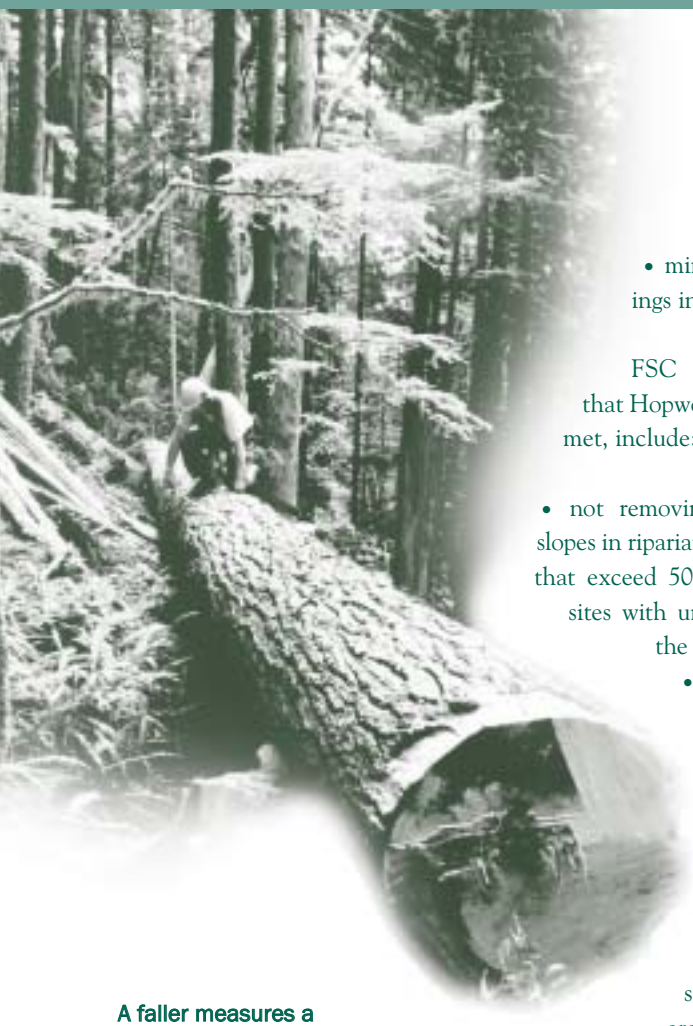

A faller measures a Douglas fir log in the first area logged by Iisaak Forest Resources in the Clayoquot Sound area of Vancouver Island. The area was logged in 2001 and meets the exacting standards of FSC certification. Photo: Iisaak Forest Resources.

- minimized road crossings in riparian areas.

FSC audit conditions that Hopwood has successfully met, include:

- not removing any trees from slopes in riparian zones of influence that exceed 50 per cent, or from sites with unstable soils within the riparian ecosystem;
- clearly demarcating riparian ecosystem boundaries along slope breaks;
- constructing drainage control structures to ensure that no sediment is delivered to any wetlands;
- permanently maintaining one quarter of all trees within 10 metres of ephemeral and intermittent streams, representing height, species and age class that occur under natural conditions; and
- providing no-cut buffers of 20 metres where riparian ecosystems adjoin neighbouring clearcuts.

Making First Nations' Participation a Reality and Protecting Endangered Forests

Iisaak Forest Resources (FSC), Clayoquot Sound, British Columbia

Based in Clayoqout Sound, Iisaak Forest Resources operates amidst the largest remaining tracts of intact old-growth temperate rainforest on Vancouver Island. Working in such an ecologically (and politically) sensitive region, Iisaak faces the challenges of living up to the high expectations of responsible forest management and local economic viability. Iisaak, a First Nations-led forest company, was awarded FSC certification by the Rainforest Alliance's Smartwood program in 2001.

Iisaak is a joint venture between First Nations and a large tenure forest company. It is the original First Nations TFL holder. What makes it perhaps most unique is its Memorandum of Understanding with several environmental organisations, which includes not logging in the large pristine valleys of Clayoquot Sound.

Clayoquot Sound was the scene of immense forestry conflict through the 1980s and 1990s. Protests over logging practices resulted in widespread civil disobedience, the arrest of 856 people in 1993, and the appointment by the provincial government of a Scientific Panel to make recommendations on new forest practices. While that may have been a tall order given the constraints, the Panel's unique combination of contemporary science technical knowledge and Traditional Ecologcial Knowledge did produce a courageous set of recomendations for ecosystem-based planning and practices.

To that end, it combined scientific and modern, technical knowledge of specialists in rainforest ecology, earth sciences, ethnobotany and forestry along with the traditional knowledge of Nuu-chah-nulth First Nations elders.

The resulting five volume report provided recommedations for ecosystem based forest planning and practices in Clayoquot Sound. It described a new approach to planning forestry operations at regional, watershed, and stand levels. This hierarchical planning approach was to guide the implementation of a new silvicultural system to be implemented within all parts of Clayoquot Sound. As yet, several policy and institutional barriers have prevented full implementation of the Science Panel recommendatations.

As a joint-venture company owned by the Nuu-chah-nulth First Nation (51 per cent) and Weyerhaeuser Company (49 per cent), Iisaak began logging its area-based tree farm license (TFL 57), an 87,000-hectare (217,500-acre) area, on August 22, 2000. This signalled new opportunities to apply the Science Panel recommendations in Clayoquot Sound, which had been designated a United Nations Educational, Scientific and Cultural Organization (UNESCO) Biosphere Reserve earlier that year.

In the language of the Nuu-chah-nulth First Nation, 'Iisaak' means respect. The company

describes itself as operating "on the principle of respect for all living things." As such, it has committed itself "to respect First Nations' traditional knowledge; promote sustainable economic development within the local communities, and protect the ecological integrity of the Sound."

Iisaak is striving to incorporate conservation base forestry practices including:

- mapping and excluding from logging activities all ecologically and culturally sensitive areas;
- applying selective, variable-retention and dispersed-logging techniques;
- protecting riparian forests throughout watersheds; and
- extensively deactivating logging roads and restoring natural forest conditions in tree plantation areas.

According to the public summary of the certifier's auditing report, Iisaak's general approach has been to manage the entire area as a high conservation value forest. Cutblock sizes range from 0.5 to 4 hectares and retention rates are over 50%.

The critical challenge for Iisaak will be shifting to maximize the value from its timber harvested rather than relying on profits from increasing the volume logged (quality rather than quantity). This is key to realizing its long-term objective of minimizing the impact. As an FSC certified company, Iisaak has enjoyed the support of major environmental groups, including Greenpeace, Natural Resources Defense Council, Western Canada Wilderness Committee, and the Sierra Club of Canada, B.C. Chapter.

Unlike Interfor, the other TFL holder in Clayoquot Sound, Iisaak has taken steps to voluntarily reduce its impact on a very contentious and important ecosystem.

FSC-certified Iisaak lumber (Photo: Cindy Hazenboom).

Restoring Healthy, Native Forests

Pictou Landing Woodlot (FSC), Nova Scotia

"For Members of the Pictou Landing First Nation, forestry is all about turning around the mistakes of the past and charting a new course where the social and economic health of the community is rooted in a healthy environment."- A Voice on the Land: Collier, Parfitt & Woollard, 2002

Pictou Landing in Nova Scotia was the first First Nations forest management area to get FSC certified in Canada. Using the FSC Maritimes Regional Standards, this 160-hectare (400-acre) woodlot was certified by the SmartWood Program-Rainforest Alliance in March 2000. The woodlot has had an annual allowable cut of 416 cubic metres per year over the last five years. The Pictou Landing Forest is part of the

Nuu-chah-nulth First Nations members celebrate the opening of Iisaak Forest Resources in 2001. The company, which is majority owned by Nuu-chah-nulth First Nations, has FSC-certification. Photo: Cindy Hazenboom.

Maintaining and restoring healthy, natural forests is a key component of FSC-certified forestry, including this woodlot on Vancouver Island. Photo: Garth Lenz.

Acadian forest and covers of lands that were logged, homesteaded, farmed and ultimately abandoned in the 1930s and 1940s. Today, these young forests are comprised of second and third growth red and white pine, spruce, balsam fir, tamarack, yellow, birch, poplar, red maple and red oak.

Until recent times, these forests were managed according to the objectives of federal and provincial forestry agreements. Over the last few years, the Pictou Landing forestry staff have rejected the advice of these agencies in order to implement lower impact, low intensity forestry practices that promote the succession of the more valuable, older growth stages of the original forest. In 1993, the Pictou Landing First Nation successfully sued the provincial and federal governments, as well as Scott Paper, for their use of Boat Harbour as a treatment lagoon, where toxic effluents and emissions were released in the waters. With the success of their lawsuits, the Pictou Landing First Nations Band received a settlement for damages incurred, and negotiated for the removal of the effluent pond from Boat Harbour.

In many ways, this was a turning point that has since been reflected in the community's goals and objectives for their forestlands. Today, their woodlands are seen primarily as a social resource. That resource will provide recreational and subsistence opportunities including hunting and food-gathering as well as educational opportunities, in particular opportunities to learn about wildlife and ecosystem restoration. Finally, the woodlands are viewed as a means of generating some limited seasonal logging jobs. Over time, those jobs will increase in duration as the trees become older and bigger.

Some of the long-term objectives for the forest are to create and maintain such complex ecological functions, characterized by clean water and plant and animal diversity, as well as an educational forum for both understanding forest ecosystems and learning responsible forestry practices. It is broadly understood that the forest is a major provider of benefits for the band, including employment, training opportunities, income from timber sales and stumpage, and raw materials for traditional art.

The Pictou Landing forest management plan employs conservative methods for calculating its annual allowable cut, based on volume reductions for insects, disease, blowdown and special management zones where maintaining water quality is a priority.

Overall, the plan is premised on long-term objectives to restore the Acadian forest. Within the plan, each stand is described in detail, with recommended treatments, timelines and harvesting plans for each stand projected well into the future.

The following are some of the goals and management guidelines of the Pictou Landing Forest:

- The primary objective is to restore the Acadian forest using a modified selection harvesting system.
- The focus is on crop-tree release and crop-tree improvement, employing single tree selection, group selection, and shelterwood harvesting techniques.
- Preference is given to late successional species, including red spruce, red and white pine, hemlock, yellow birch, red oak, sugar maple and ash.
- The maximum height of individual stands is maintained by retaining the tallest trees
- Vertical structure is maintained by retaining healthy individuals of as many species, age, diameter and height classes as possible.
- Where possible, fallen dead wood is retained for ecological purposes.
- To encourage a more mixed forest, very few hardwoods are removed from softwood stands, and few softwoods from hardwood stands.
- Timber extraction is done by porters and tractors. Use of tractors and horse-loggers are preferred.
- Protection of stream corridors, forest swamps where the water table is high year-round, and areas that are heavily used by wildlife isensured.
- Watercourses, with an average width greater than one metre, require, at minimum, 30 metre wide buffer zones on all sides of watercourses and water bodies, while 15-metre wide buffer zones are required on watercourses less than one metre in width.

Making Improvements When Needed: FSC's Adaptive Nature

Westwind (FSC) and Ontario First Nations

Covering more than 880,000 hectares (2.2 million acres) of public forest in Ontario, the Westwind Forest Stewardship Inc. is, to date, the largest FSC certified forest management area in Canada. The mixed (deciduous-coniferous) second growth forests, named the French/Severn after the river systems that define its northern and southern boundaries, includes all crown or publicly owned forestlands in the Parry Sound-Muskoka region of southern Ontario. The other half of the Muskoka region is in private holdings and is famous for being the province's "cottage-country" recreational area.

Created in 1998, Westwind is a non-profit, community-based forest company with a sustainable forest management license under the provincial jurisdiction of the Ontario Ministry of Natural Resources (OMNR). What is unique about Westwind is that while it is responsible for the overall management planning and stewardship of the forest base, it does not partake in any actual commercial forestry activity. The logging is done by more than 30 entities, including two large companies, Tembec and Domtar, a handful of smaller Ontario-based mills as well as a number of small woodlot-sized logging operators. Each forest operators' timber allocations and cutting permits are based on their shares in Westwind. Westwind is paid a fee for all management planning and oversight activity. For example, the smaller operators' one per cent shares in Westwind, translate into an annual log harvest of 1,800 cubic metres per year.

Cam Brewer, Director of the Canadian Eco-Lumber Co-op, inspects FSC-certified cedar lumber products derived from forests sustainably logged by Iisaak Forest Resources.
Photo: Barry Calhoun.

The Westwind Forest Management Lands overlap the traditional lands and territories of eight First Nations: the Algonquins of Golden Lake (Pikwakanagan), the Dokis, the Henvey Inlet, the Magnetawan, the Shawanaga, the Wasauksing, the Moosedeer Point and the Whata (Mohawk).

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FSC: Thresholds of First Nations' Cooperation and Consent in British Columbia

FSC Criterion 3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies. In the recently drafted BC Regional Draft Standards the following are some of the salient, regionally appropriate indicators scripted for this criterion, with the support of all chambers, including B.C. First Nations.

3.1.1 The manager recognizes and respects the legal and customary rights of the First Nation(s) over their lands, territories and resources and the First Nation(s) formally indicate that their legal and customary rights over their lands, territories and resources have been recognized and respected.

3.1.4 The manager has negotiated a protocol agreement(s) with relevant First Nation(s) that provides for the nature of the relationship between the parties.

3.1.5 The manager has obtained free and informed consent, normally in writing, for the management plan from the appropriate First Nation(s) by either: a) jointly developing the plan according to the process set out in a joint management agreement, or, b) consulting with the First Nation(s) on the plan.

3.1.6 Where more than one First Nation is affected by the area being proposed for forestry activities, consent from each is ordinarily required.

Iisaak Forest Resources meets these important requirements.

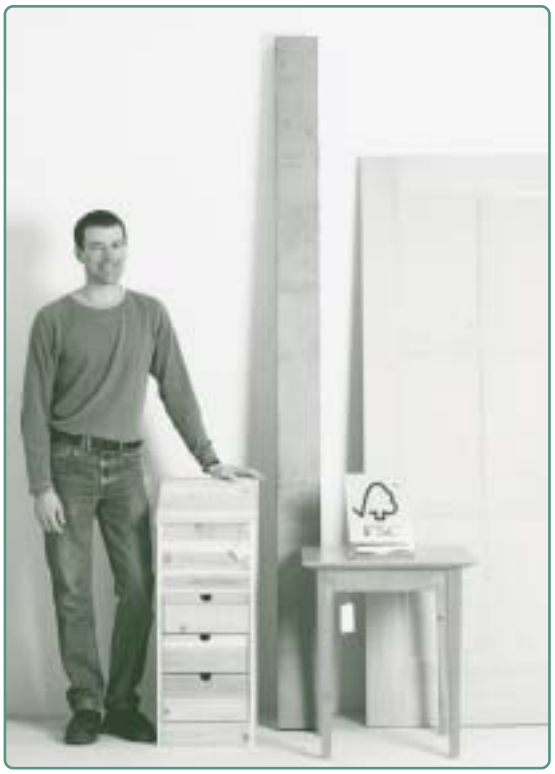
When Westwind was audited by SGS Qualifor for FSC certification in 2001, SGS met with a number of these First Nations, and found that they were not adequately or meaningfully consulted on Westwind's forest management plans or activities. The SGS audit also found that Westwind did not have a strategic plan for dealing with First Nations' involvement, or any documented agreements with local First Nations. These findings led SGS to issue a Corrective Action Request (CAR). Among other things, Westwind had to convene a committee to produce and implement a strategic plan to address the involvement of First Nations, prior to an FSC certificate being awarded. Upon completion of the draft strategic plan, Westwind held further meetings with each First Nations community, its chiefs and forestry staff for further development of this plan. This process ultimately led to the certification of Westwind in March 2002.

While these efforts were viewed positively by local aboriginal communities, it was apparent that further improvements were still necessary to strengthen the forest manager's commitment to these communities.

What became evident through this certification process is that beyond the actions of the forest manager and the certifier, the FSC's draft standards for the Great-Lakes St. Lawrence region were inadequate in detailing the requirements for recognition of First Nations' title and rights. This inadequacy was compounded by the fact that these draft standards had not included aboriginal involvement in their design and formation. The standards were drafted by a technical committee, given minimal public review, and found ultimately to be unsatisfactory to local First Nations.

As written, the FSC's Principles and Critiera provide a framework for

IKEA is one of a growing number of companies committed to finding sources of FSC-certified wood and using it in some of the products it sells. Photo: Barry Calhoun.



The Canadian Eco-Lumber Co-op in Vancouver carries a range of products that are made from trees logged at FSC-approved sites. Products include everything from lumber to finely crafted furniture. Photo: Barry Calhoun.

national and regional initiatives to develop appropriate standards that include benchmarks for performance measures. In this instance, the technical writing team that developed the standards was unable to draft specific language for meeting FSC Principle 3, largely because the team did not include representatives from First Nations. To fix this, FSC Canada involved the Anishinabek Nation (Union of Ontario Indian Chiefs) in a manner that met the local First Nations' satisfaction. FSC Canada has since initiated a number of processes whereby the appropriate inclusion of First Nations will help guide standards development. These remedial measures include:

- A joint FSC Canada and National Aboriginal Forestry Association (NAFA) Conference on Indigenous Peoples and FSC Certification, which produced a draft "Strategic Directions Paper" as well as an "Operational Plan" for its implementation.
- The formation of an Indigenous Peoples' Advisory Council, to guide FSC on all current and future First Nations issues.
- Collaboration with the Anishinabek Nation to examine and resolve issues of undercapacity that limit the involvement of aboriginal communities in certification and forest management planning.

Small patch cuts like these by Iisaak Forest Resources leave a healthy forest behind following logging. This logging site in Clayoquot Sound is FSC-certified and typifies the type of logging conservationists and a growing list of retailers hope to see more of in the years ahead. Photo: Cindy Hazenboom.

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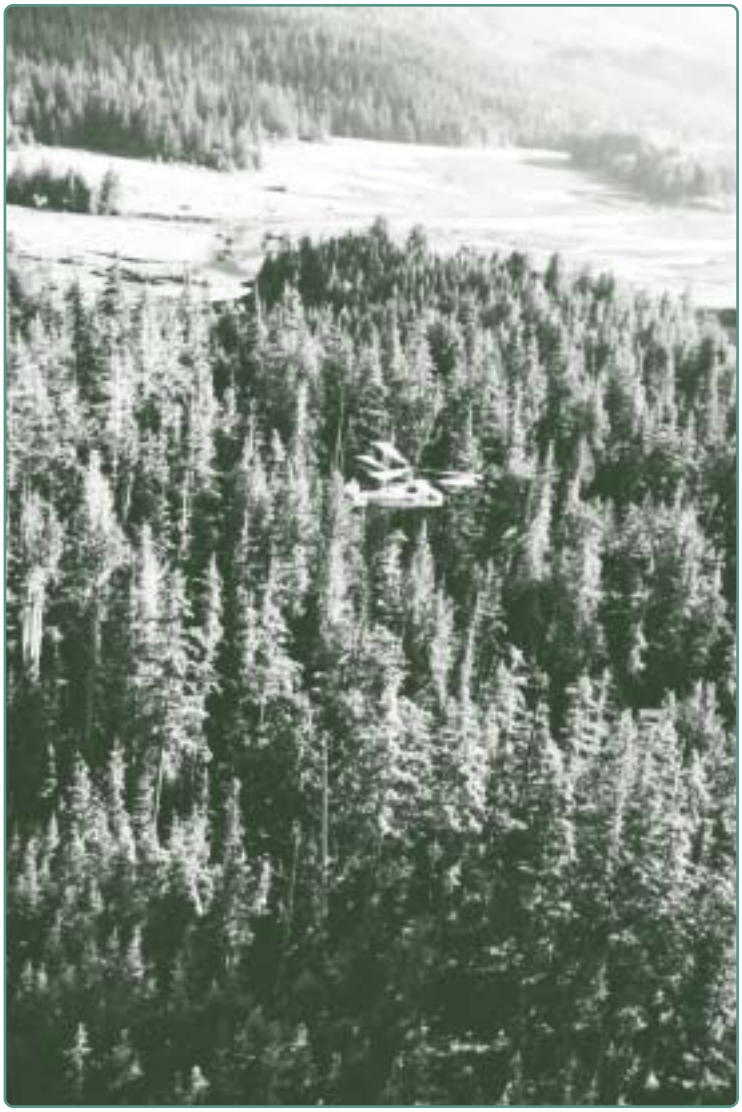

Helicopter yarding in a selective logging operation.
Photo: Cindy Hazenboom.

- The undertaking of a new standards development process for an amalgamated Great Lakes/St. Lawrence/Laurentian Regional FSC Standards, with the equitable involvement of First Nations.

This last case study highlights one of many reasons why this certification system enjoys such broad support from the conservation community. The FSC system is highly adaptive and consists of a broad range of players. As a result, when problems do arise they can be addressed with changes made to better reflect the needs and aspirations of important constituents such as First Nations.

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Appendices

A Sample List of Companies Committed to FSC Certified Forest Products

Many companies both large and small have committed to purchasing FSC certified products around the world. Here is a small sample:

Andersen Windows
B&Q
BBC Wildlife Magazine
Bristol Myers Squibb
Canadian Eco-Lumber Coop
Home Depot
Ikea
Nike
New Leaf Papers
McClelland & Stewart
Mitsubishi Corporation
Mother Jones Magazine
Random House of Canada
The Body Shop

"B&Q recognises that FSC currently has the best available standards and certification procedures and so will only buy products certified under the FSC scheme."
- B&Q Revised Timber Buying Policy for B&Q, 2000

Certification Websites

Canadian Standards Association	http://www.csa-international.org
Sustainable Forest Initiative	http://www.afandpa.org/forestry
Forest Stewardship Council, A.C.	http://www.fscoax.orh
Forest Stewardship Council Canada	http://www.fsccanada.org
Forest Stewardship Council-BC	http://www.fsc-bc.org
Canadian Eco-Lumber Co-op	http://www.ecolumber.ca
Canadian Sustainable Forest Certification Coalition	http://www.sfms.com
Certified Forest Product Council	http://www.certifiedwood.org
Standards Council of Canada	http://www.scc.ca
Good Wood Watch	http://www.goodwoodwatch.org

Acknowledgements

I would like to thank the following individuals and organizations for their review, comments, thoughts, ideas, critique and general inspiration that all went into the creation of this report.

Phil Aikman, Rick Avis, Connor Bailey, Bill Barclay, Gwen Barlee, Paul Blom, Harry Bombay, Beverly Brown, Cam Brewer, Andrew Bryant, Jessica Clogg, Russell Collier, Judy DaSilva, Russell Diabo, Phil Edgell, Gavin Edwards, Hans Elias, Jonathon Evans, Jim Ford, Andy George, Daniel Hall, Herb Hammond, Earl Holley, Al Hopwood, Brad Hornick, Frank Hovenden, Kate Heaton, Kristin Kolb Angelbeck, Rod Krimmer, Fabrice Lantheume, Kathryn Latin, Chris Law, Jessica Lawrence, Ingmar Lee, Tawney Lem, Garth Lenz, Erik Leslie, Derek Martin, Lisa Matthaus, Ian McAllister, Neva Murtha, Louise Molloy, Doug Murray, Maryjka Mychajlowycz, Ben Parfitt, Vivian Peachey, Rachel Plotkin, Matt Price, Bill Randles, Sarah Brown Riggs, Rami Rothkop, Nicole Rycroft, Peggy Smith, Tamara Stark, Martin Stephan, Don Sullivan, Dana Smith, Cielo Sands, Greg Schell, Grant Scott, Gean Seay, Chief Barry Seymour, Gary Swann, Jill Thompson, Martin Von Mirbach, Helene Walsh, Donovan Woollard, Peter Wood, Ken Wu, the Alberta Wilderness Association, Albertans for a Wild Chinchaga, American Lands Alliance, Canadian Eco-Lumber Coop, Carrier-Sekani Tribal Council, David Suzuki Foundation, the Dogwood Alliance, ForestEthics, FSC-BC Regional Initiative, Friends of Clayoquot Sound, Greenpeace Canada, Harrop Procter Community Forest Cooperative, National Aboriginal Forestry Association, Sierra Club, Silva Forest Foundation, Swamp Watch Action Team, West Coast Environmental Law Association and the Canadian Reforestation & Environmental Workers Society.

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GREENPEACE

www.greenpeace.ca

Sierra Club of/du Canada
BC CHAPTER

www.sierraclub.ca/bc