



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

July 10, 2015

Francois Dufresne
President FSC Canada
Email: fdufresne@ca.fsc.org

Dear Mr. Dufresne,

Alberta Wilderness Association (AWA) is a provincial environmental association that works throughout Alberta towards more representative and connected protection of Alberta's unique and vital landscapes. These landscapes are the source of our abundant clean water, clean air and vital habitat for wildlife in each one of our six natural regions. We have been working in Alberta for fifty years, to raise the profile of Alberta's spectacular wilderness, and to help Albertans learn more about the value of our wilderness and wildlife, and participate in opportunities to protect and care for the legacy that we will leave for generations. With more than 7000 members and supporters, AWA remains committed to assuring protection of wildlife and wild places for all Albertans.

AWA has been a member of the Forest Stewardship Council (FSC) since its inception in 1993 and remains an active member, with Cliff Wallis as our representative. AWA supports the mission of FSC Canada to "promote environmentally appropriate, socially beneficial, and economically viable management of Canada's forests." Several environmental non-government organizations, including AWA, were eager to sign on to FSC because it met certain requirements needed to be a strong certifier in Canada. These included 1) the establishment of protected areas 2) objective, comprehensive, independent and measurable standards 3) full transparency 4) third-party assessments, and several others. However, AWA's recent experience with Spray Lake Sawmills (SLS) FSC certification has left us with serious concerns about FSC.

AWA believes FSC must undergo a fundamental policy change to gain control over auditing services so they are truly independent of industry. When forestry companies wanting certification, choose, hire and are responsible for their auditors, this is a perceived and quite probably a significant conflict of interest. As part of the groups and individuals who worked to get FSC organized and established as the most legitimate forestry certifier in Canada, this fundamental flaw is of utmost concern. AWA recognizes the importance of industry buy-in for FSC certification as it remains a voluntary program.

However, AWA is concerned that given our recent experience, it is not hard to discredit FSC certification as an effective tool to transform forestry practices and ensure sustainable forest management.

As it stands today, FSC sets the rules and accredits independent certifying organizations to carry out the audits of forest management to the agreed set of principles and criteria. Forestry companies then hire any of the accredited certifying organizations and can switch certifiers at any time.

SLS hired Rainforest Alliance's SmartWood Program as their certifier for their initial FSC audit before transferring to Bureau Veritas (BV) as their second certifier. The first attempt of SLS to be certified was denied by SmartWood. Once tentatively certified, sixty minor non-conformances had to be reviewed during the transfer process from SmartWood to BV. The transfer audit report stated that this was an "extremely high number of non-conformances for a Canadian forest." Yet BV closed all but one minor non-conformance. This huge discrepancy between two certifying organizations in less than a two year time period between audits, calls into question the standards of FSC certification and the certifiers. (See references below for specific details).

AWA is concerned with the unprofessionalism of Bureau Veritas' lead auditor and many aspects of both the transfer report and public audit report. AWA was specifically named in the BV report in several places because we made time to take the primary auditor onto several sites of particular concern to AWA and others. We felt our broad concerns over the cutting of Compartment 12, the Aura Creek extensive wetlands, identified by consultant John Kansas as one of two most important High Conservation Value Forests within the SLS FMA, was justified since the area was recognized by the consultant and the public as highly biologically important and was largely intact and without roads. It was a prime area for protection, and the type of management that SLS's DFMP goals suggest should be given special management considerations. None-the-less on viewing the logging, our general concerns were dismissed as being land use issues that are the purvey of the Alberta Government, not SLS. The auditor told us, in his view, SLS had followed all government regulations in logging the area, and therefore we had no valid issues. Further, he dismissed all minor complaints about short culverts, non-functioning water dams and no buffers being left around springs, ephemeral creeks or wetland edges as "unfounded", explaining that the Boreal Standard for logging required no buffering, and those complaints held no concern for him. He also referred to what he saw here in Alberta as better than one would find in Ontario. AWA believes comparing SLS's logging practices to the standards and guidelines of FSC not what the auditor had witnessed in Ontario forests was a reasonable expectation.

We also showed the lead auditor a massive clearcut on high elevation land that was logged 8 years ago and very little regeneration could be seen. On close inspection, the tiny, blasted seedlings were hard to find. They had been in place 5 years. AWA considers this inadequate regeneration. The auditor considered the site to be struggling but adequately stocked although he did no more than walk a short distance and look at a few square metres of the site.

The following quotes are taken directly from BV's 2015 reports:

- “The Company operates in a challenging environment being located close to Calgary with high public visibility and **with some very active and often intransigent stakeholder groups.**”
- “There is a small cabal of stakeholders who feel that consultation means capitulation.”
- “The PAC included a variety of members, **the cabal of fringe groups are upset** as they are not on the PAC, though a previous member from the cabal quit for reasons unknown.”
- “Had a field trip on Oct 29 with AWA and found most allegations to be unfounded, renewal in the blocks they chose was good, water crossings were fine, wetlands are protected. **They did have land use issues which are not SLS problems.**”

(Emphasis added)

AWA is a very reputable and long standing conservation group in Alberta. We are held in high regard and taken seriously by companies across all industries, governments of all levels, and the Alberta public. To dismiss every one of our concerns in a completely unprofessional manner not only discredits Bureau Veritas as an independent auditing company but also wavers our support for FSC’s standards and process.

AWA believes FSC must ensure costs and benefits are properly weighed in the assessment process. Today, many communities are at increasing odds with forestry operations and the trade offs in public values and resources for private industry benefit. Increasingly watershed services, viable wetlands, wildlife habitat, recreation and aesthetically pleasing landscapes are recognized as important public values on public lands, and these are often at odds with industrial development of these lands. This is especially true of forestry operations near towns and cities, such as the SLS operations on the doorsteps of a dozen growing towns and the fast-growing city of Calgary. We hope that the new International Generic Indicators (IGIs) and the ensuing Canadian standard will mandate the incorporation of the value of a range of ecosystem services in light of logging operations that devalue or destroyed them.

AWA is unclear of the value of identifying High Conservation Value Forests (HCVFs) and monitoring them if they will be clear cut logged in the same manner as other forest areas. High Conservation Value Forests must have clearer definition and defined expectations through the FSC process. In the example of SLS, there is no clear expectation of how the company should manage/set aside/protect identified areas of HCV. Also, forests identified as HCV through hired consultants must have a clear management path that, above all other aspects of company responsibility, involves meaningful public engagement in the future of these lands. This is not the situation now. In the case of SLS, the company has chosen two identified HCVFs within their FMA for “deferred logging” to some undetermined future time. They also chose to ignore one larger area identified by their independent consultant as HCVF, and broadly supported by the public for its range of values, logging it quickly before large-scale protest could be mounted. The mechanism and value of FSC certification is left in a questionable position.

While we are hopeful that the new standard being developed to comply with IGIs, the independence and oversight of auditors is another issue that will need to be addressed. AWA hopes you will take

our concerns into consideration and begin making these fundamental and necessary changes to the auditing selection and process. While we know Bureau Veritas has been suspended as a certifier on previous occasions, we trust you must be re-evaluating Bureau Veritas as an independent FSC certifier.

We look forward to hearing from you soon on this serious matter.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Brittany Verbeek, Conservation Specialist

References:

Bureau Veritas as Certifier/Auditor for Spray Lake Sawmills Ltd. Cochrane, AB, Canada

Initial Audit Date: October 27-31, 2014

Certificate Registration Code: BV-FM/COC-104091

Certification date: 10-25-2013

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